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9 July 2003

Dear Mike

Implementation Review of the Ten Commitments to Best Siting Practice for the UK Mobile Industry

Please find attached the final Deloitte & Touche report with respect to the Ten Commitments.

This report contains the findings of our review of the Implementation of the Ten Commitments.

The report is structured towards the three main components of our deliverables, namely:

- Findings with regard to performance on the Planning Commitments (Commitments 1,2,7 and 10). This has been the primary focus of our review as requested by you and agreed in our Engagement Letter dated 1st October 2002.
- Findings in relation to the other Commitments (3, 4, 5, 6, 8 and 9).

The steps required to implement the Planning Commitments (Commitments 1, 2, 7 and 10) have been detailed, by the Operators, in the Site Selection and Planning Model. Therefore, the structure of the review for these Commitments is around the commitments made in the Site Selection and Planning Model.

The report provides the Deloitte and Touche opinion on the performance of the Operators and their agents in implementing the Ten Commitments over the period September 2001 to 12 August 2002 across the four regions of the UK (England, Scotland, Wales and Northern Ireland).

The basis of our opinion, scope of work, intended purpose and use of the report and the respective responsibilities of involved parties are all detailed within this report. This report should only be read in its entirety and any interpretation taken by reading isolated sections or phrases may be misleading.

In the interest of brevity and clarity we have only reported background to the review where absolutely necessary. This may mean that readers not familiar with the UK Planning regime and the Ten Commitments may need to make reference to the MOA website to review previously published background material.

I hope you find the report useful and that the Operators and their Agents take the opportunity to use this report as leverage to ensure continuing implementation of the intent of the Ten Commitments

Yours sincerely

A handwritten signature in black ink that reads "Nigel Mercer". The signature is written in a cursive, slightly slanted style.

Nigel Mercer
Partner
Deloitte and Touche

**Implementation Review
of the
Ten Commitments to
Best Siting Practice
for the
UK Mobile Industry**

July 2003

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1. BACKGROUND TO THE OPINION

1.1 Purpose and use of this report

This Report is intended solely for use by the Mobile Operators Association (MOA) for the purpose of an independent progress update of the implementation of the Ten Commitments to Best Siting Practice (The Ten Commitments). Without giving rise to any liability or duty to the MOA on Deloitte & Touche's part, the Report is for the information of the Operators and other third parties.

No party other than the MOA and the Operators is entitled to rely on this Report for any purpose whatsoever. Any reliance any such party may seek to put on the Report is entirely at its own risk.

In preparing the Report, Deloitte & Touche neither owe nor accept any duty of care, whether in contract, tort or whatever nature to any party other than MOA and the Operators, including but not limited to the Federation of the Electronics Industry (FEI) or its successors, or the UK Government, and shall not be liable for any loss, damage or expense of whatever nature which such third party may suffer as a result of the Report.

The recipients of this Report must not make available or copy this Report, in whole or in part, to any other party without the express written permission of Deloitte & Touche.

Deloitte & Touche retain the copyright and all intellectual property rights in the Report.

1.2 Scope of the work

This Report solely covers the implementation of the Ten Commitments to best siting practice carried out by the 5 UK mobile operators (3, O2, Orange, T-Mobile and Vodafone) and does not extend to any other business of the MOA or the Operators.

The primary focus of this review has been on the planning related commitments, Commitments 1, 2, 7 and 10. The other commitments have already been met or have been the subject of other reviews. The Report does include a brief summary on progress regarding all of the Ten Commitments.

1.3 Respective responsibilities of the MOA, the Operators and Deloitte & Touche

The MOA and the Operators are together responsible for the design and maintenance of the Ten Commitments to Best Practice, for assessing the adequacy of those Commitments for their purposes and for ensuring that their purposes are communicated to and understood by all stakeholders.

The Operators are individually responsible for determining how they are to implement the Ten Commitments in their own organisation. They are also responsible for monitoring and assessing compliance with those Commitments by their own organisations, and by such agents as might act for them. If action plans are required to achieve or improve upon

compliance with the Commitments, the Operators are solely responsible for determining the appropriateness of those plans and for their implementation.

It is Deloitte & Touche's responsibility to form an independent opinion, based on the work it has carried out and the information provided by the Operators and their agents, and to Report its opinion to the MOA.

It is the responsibility of the operators to design, implement, operate and maintain procedures in accordance with the Ten Commitments.

1.4 Basis of Deloitte & Touche opinion

This review by Deloitte & Touche was based upon obtaining an understanding of the implementation of the Ten Commitments by the UK mobile industry by enquiry of management of the Operators and their agents and gaining views of a selection of local planning officers, community groups and National Pressure Groups and reviewing documents supplied to Deloitte & Touche by the operators and other parties involved in the Ten Commitments. The work included tests of planning procedures, as set out in Appendix 1 of this Report, to determine whether they were being implemented as required by the Ten Commitments.

During this review a total of 559 site files were reviewed. Interviews were held with each of the Operators and each of the 16 Agents that were visited as part of the review of site files. Further interviews were held with 13 Local Planning Officers; 16 were contacted. Interviews were also held with 10 local community representatives; 23 were contacted. Three national pressure groups were contacted, of which one refused to be interviewed. The statistics in this review are based on the examination of the Agents' site files.

Deloitte & Touche have not performed an assessment of the adequacy or completeness of the Ten Commitments in relation to the issues they are designed to address nor has it assessed whether the Ten Commitments achieve the objectives that were set. Deloitte & Touche's opinion relates solely to the implementation of the procedures that were tested and not to any others. The tests did not include comprehensive tests of planning in respect of any particular base station.

This review does not make a judgement on the Ten Commitments themselves, nor is any of the performance attributable to any particular site or Operator. No such indication or inference can be or should be drawn.

Procedures designed to review the implementation of the Ten Commitments will be subject to inherent limitations due to the sample size taken and, accordingly, errors or irregularities may occur and not be detected. Such procedures cannot guarantee protection against fraudulent collusion especially on the part of those holding positions of authority or trust. Furthermore Deloitte & Touche's opinion will be based on historical information and the projection of any information or conclusions, contained in its opinion or the attached Report, to any future periods is subject to the risk that changes in procedures or circumstances may alter their validity.

2. DELOITTE & TOUCHE OPINION

The Deloitte & Touche opinion detailed below is subject to the agreed purpose and use of this report (Section 1.1), the scope of work (Section 1.2), the respective responsibilities of the MOA, the Operators and Deloitte & Touche (Section 1.3) and the basis of the opinion (Section 1.4).


2.1 Deloitte & Touche Opinion

We have examined the requirements of the Ten Commitments to Best Siting Practice and the Site Selection and Planning Model and compared these with the practice of the UK mobile telecommunications industry (five network operators (“the Operators”) and their Agents (see Glossary) with regard to roll out and upgrade of networks) during the period 1st September 2001 to 12th August 2002. Our examination included procedures to review documentation and interview relevant individuals in order to obtain reasonable assurance about the degree of implementation by the five main Operators of the Ten Commitments with particular focus on the planning commitments – Commitments 1, 2, 7 and 10.

Based on the above, in our opinion, the evidence we have seen of the Operators’ processes and procedures during our review fairly reflects the Operators’ assertion that the Operators have made demonstrable progress in implementing the Ten Commitments (including both the “Essential components” and the “Optional components”). Progress in implementing the “Essential components” was reasonably strong. Given the relatively new nature of some of the Commitments at the time of the review some of the processes were not fully operational and there are areas where implementation was not comprehensive or thorough - most notably in the “Optional components” of the Site Selection and Planning Model (see Appendix 2).

In our opinion, the specific planning procedures that we tested as set out in the attachment to this report (Appendix 2) operated as described in Section 3 of this report in the period from 1st September 2001 to 12th August 2002.

Our scope included no assessment of the effectiveness of the objectives of the Ten Commitments. The tests we performed covered the period specified. Any projection of such information to the future is subject to the risk that, because of changes in the procedures, the validity of any conclusions from this report may be altered.



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9 July 2003

3. BACKGROUND TO THE FINDINGS

This review is part of the UK Mobile Operators' ongoing response to increasing community concern and constituent pressure with regard to the roll out of the mobile telecommunications network in England, Scotland, Wales and Northern Ireland.

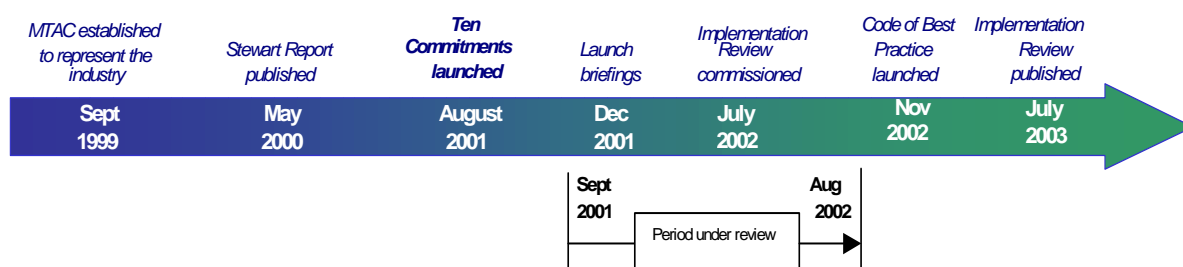


Figure 1: Timeline of the Ten Commitments

The Ten Commitments represent a voluntary attempt by the mobile network operators in the UK to achieve the following aims:

- improved transparency of the process of building mobile networks;
- providing more information to the public; and
- increasing the role of the public in the siting of base stations.

The MOA and the Operators have developed and implemented the Ten Commitments primarily as a way to improve the information provided to and communication with Local Planning Authorities.

It should be remembered in reading the findings of this review that the pre-planning consultation committed to is not a legal requirement, but additional voluntary procedures.

The Ten Commitments were developed by the MOA (formerly called the FEI) and the Operators in consultation with various stakeholders including government, local government, and community groups. This was undertaken by stakeholder roundtables and surgeries at which stakeholders were invited to put forward and discuss their views.

There are/have been other mechanisms to provide performance feedback on implementation of the practices. These include:

- MORI poll of LPA satisfaction (benchmark 2001, follow-up study Spring 2002 and Spring 2003);
- ODPM 'Code of Best Practice' working group with reports to Ministers;
- Internal Operator Quality Assurance programmes;
- Regular meetings between the MOA and National Pressure Group; and
- Ongoing Stakeholder round table meetings.

It should be noted that the ODPM Code of Best Practice outlines steps and measures that may address many of the issues raised in this report. The reader should note that the timing of this review was September 2001 to August 2002 and that the Code of Best Practice was launched after this date (November 2002). Where specific coverage is provided by the Code of Best Practice this is referred to in the recommendations.

This review is based on the Ten Commitments to Best Siting Practice defined by the MOA. The following definitions have been supplied by the MOA and are available on their website – http://www.mobilemastinfo.com/planning/best_practice.htm

The Ten Commitments to Best Siting Practice:

1	<p>IMPROVED CONSULTATIONS WITH COMMUNITIES</p> <p>Develop, with other stakeholders, clear standards and procedures to deliver significantly improved consultation with local communities.</p> <p>Reference: Traffic Light Model (Appendix 2)</p> <p>Reference: Site Selection and Planning Model (Appendix 2)</p>
2	<p>DETAILED CONSULTATION WITH PLANNERS</p> <p>Participate in obligatory pre-rollout and pre-application consultation with local planning authorities.</p>
3	<p>SITE SHARING</p> <p>Publish clear, transparent and accountable criteria and cross-industry agreement on site sharing, against which progress will be published regularly.</p>
4	<p>WORKSHOPS FOR COUNCILS</p> <p>Establish professional development workshops on technological developments within telecommunications for local authority officers and elected members.</p>
5	<p>DATABASE OF BASE STATION SITES</p> <p>Deliver, with the Government, a database of information available to the public on radio base stations.</p> <p>Further information can be obtained from www.radio.gov.uk</p>
6	<p>COMPLIANCE WITH ICNIRP PUBLIC EXPOSURE LEVELS GUIDANCE</p> <p>Assess all radio base stations for international (ICNIRP) compliance for public exposure, and produce a programme for ICNIRP compliance for all radio base stations as recommended by the Independent Expert Group on Mobile Phones (IEGMP).</p> <p>Further information can be obtained from www.radio.gov.uk</p>
7	<p>ICNIRP CERTIFICATION</p> <p>Provide, as part of planning applications for radio base stations, a certification of compliance with ICNIRP public exposure guidelines.</p>
8	<p>PROMPT RESPONSES TO ENQUIRIES</p> <p>Provide specific staff resources to respond to complaints and enquiries about radio base stations, within ten working days.</p>
9	<p>SUPPORT RESEARCH INTO HEALTH AND MOBILE PHONES</p> <p>Begin financially supporting the Government's independent scientific research programme on mobile communications health issues.</p>
10	<p>STANDARD DOCUMENTATION FOR PLANNING SUBMISSIONS</p> <p>Develop standard supporting documentation for all planning submissions whether for full planning or prior approval.</p>

Note:

Conformance with the shaded commitments is the primary focus of this review

Figure 2: The Ten Commitments

3.1 Application of the Commitments

The steps required to implement the Planning Commitments (Commitments 1, 2, 7 and 10) have been detailed, by the Operators, in the Site Selection and Planning Model. Therefore, the structure of the review for these Commitments is around the commitments made in the Site Selection and Planning Model.

The approach taken to review these planning Commitments is laid out in the Methodology (Appendix 1).

4. DETAILED FINDINGS FOR EACH COMMITMENT

The overall recommendation is that a concerted effort is required to ensure that the Commitments and especially the planning commitments are applied fully. As part of this effort it may be worth reviewing the Commitments and the guidelines to implementation themselves to ensure that they are what the various stakeholders really want. Further specific recommendations have been made against individual steps as appropriate.

4.1 General Findings on the Site Selection and Planning Model (Planning Commitments (1,2,7 and 10))

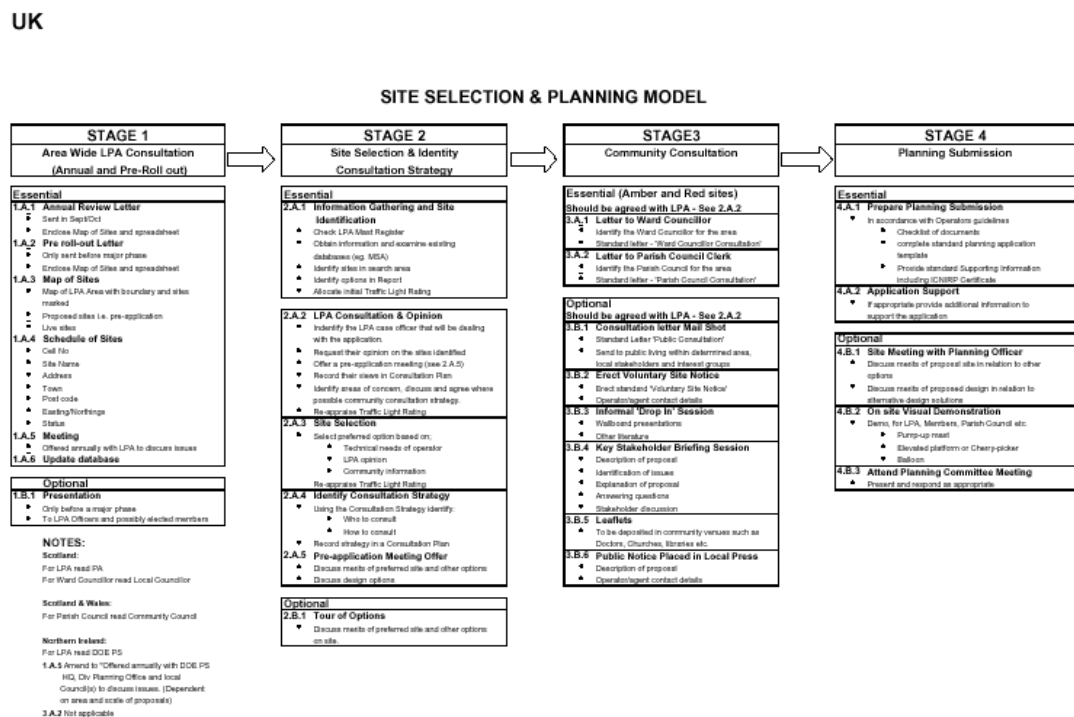


Figure 3: Site Selection and Planning Model (see Appendix 2 for larger model)

The guidelines are to assist in ascertaining the amount and type of public consultation that is required for any proposed site. The public consultation that is carried out under this process will be in addition to that already carried out for full planning by the authority responsible for planning. References to the Site Selection and Planning Model throughout this document should refer to the four-stage process as contained in Appendix 2. The Traffic Light Rating discussed in these guidelines relates to the amount of consultation to be undertaken by an operator, the intent is not intended to be a guide as to whether or not a planning application for the proposed site will be made.

The MOA guidelines on the Site Selection and Planning Model, outlined on the MOA website, state that "It is vital full records are kept regarding consultation carried out on a site for auditing purposes."

In many of the site applications / pre-application consultations examined, incomplete information was held on file. For example, no Traffic Light Model rating was held on file or poor records were kept of potential site options identified. Discussions with Planning Officers indicated that more consultation was conducted than represented in the site files – whilst this is positive it does indicate a lack of complete documentation being retained by the Agents.

In a number of cases, responsibility for progressing sites has been transferred from one Agent to another and in some of these situations incomplete records have been handed over. This can lead to assumptions with respect to the nature and amount of work previously performed and in pre-application consultation being repeated or not being performed at all.

The components of the Site Selection and Planning Model where performance was highest were the:

- allocation of the Initial Traffic Light Rating (91%);
- identification of LPA case officer that will be dealing with the application (90%);
- completing a standard planning application template (94%); and
- providing standard Supporting Information including ICNIRP Certificate (91%) (for all sites reviewed ICNIRP certificates were available).

These areas of high performance tend to relate directly to the planning elements. Components which are more voluntary appear to have been followed less rigorously, for example, re-appraisal of the Traffic Light Model or the sending of letters to Ward Councillors.

Areas where the performance against the components of the Site Selection and Planning Model was lowest were:

- holding informal ‘drop in’ sessions (2%);
- holding key stakeholder briefing sessions (4%);
- depositing leaflets in community venues (2%);
- placing public notices in the local press which describe the proposal (4%); and
- offering an on-site visual demonstration (4%).

These steps all relate to Optional components of the Site Selection and Planning Model. See Appendix 2 for detail of the Site Selection and Planning Model, detailing Essential and Optional components, and the Traffic Light Model.

Notes on the data for Site Selection and Planning Model

The following tables report our detailed findings of the 559 sites reviewed for Commitments 1, 2, 7 and 10, which are reported by:

- overall UK performance (Section 3.1.2);

- performance over time in September – December 2001 and January – August 2002 (Section 3.1.3);
- UK regional performance (Section 3.1.4); and
- performance by Traffic Light Model rating (Section 3.1.5).

The performance is reported as a weighted average across each breakdown of the data, i.e. the weightings reflect the proportions of the data in each cut of the data.

In some instances not all components of the Site Selection and Planning Model or the Commitments are applicable to the sites reviewed, due to the progress made within the pre-consultation and planning application process. Where a component of the Site Selection and Planning Model is not applicable to a site this data has been excluded from the performance results. For example, sites that have not reached the application stage are excluded from the results on whether standard documentation has been submitted with planning applications.

The Site Selection and Planning Model is divided into 4 stages as shown in Figure 3:

- Stage 1: Annual and Pre-Roll Out;
- Stage 2: Site Selection and Identify Consultation Strategy;
- Stage 3: Community Consultation; and
- Stage 4: Planning Submission.

Each of these stages is further divided between Essential and Optional components. The performance found in this review is reported by the key components within each Stage (see Appendix 2 for Site Selection and Planning Model).

4.1.1 Stage 1 - Area Wide LPA Consultation (Annual and Pre-roll out)

The Operators manage the pre-roll out and annual consultation programme through a combination of in-house resource and use of their Agents. As a result of this, the review of these components were not performed using the work programme and are not presented in the format of detailed findings against each component, as the subsequent stages have been.

The Operators stated that they send annual and pre-roll out letters to all Local Planning Authorities, this review covered Local Planning Authorities where the Operators have been active. Local Planning Authorities Planning Officers interviewed confirmed that most received Annual Review letters but that only half received pre-roll out letters. The Planning Officers interviewed had mixed opinions on the effectiveness and usefulness of the annual and pre-roll out consultations by the Operators, due to the level of detail not being consistent and the ability to tie it in to specific applications received subsequently.

As part of the Annual Review process the Operators offer to meet the Planning Officers either alone or with other Operators. In some instances this offer is taken up and joint Operator meetings may be held. The Planning Officers and, where appropriate, the community groups, feel that these meetings are highly beneficial in understanding the potential impact of the Operators' plans in their areas.

Some Planning Officers have found the Annual Review Letters they receive from the Operators to be useful in identifying potential “problem” sites, opportunities for mast sharing and as a reference point during individual pre-application consultation discussions with the Operators or their Agents. However, there appears to be confusion regarding the content of annual / pre-roll out letters versus pre-consultation letters amongst the Planning Officers, as several Planning Officers highlighted that they do not have the technical expertise to be able to comment on some of the information provided, such as power details, output and cell coverage.

Evidence of Good Practice:

An LPA arranging joint Operator meetings so as to allow open discussion of potential site shares and impact of the Operator plans on the communities involved.

LPAs have received maps of sites which they have been instructed by the Operators to hold “commercial in confidence” and hence are unable to share with the public or other Operators in order to identify potential site sharing opportunities.

All Operators have highlighted that they receive a low response rate from the Planning Officers with regard to the information sent to them. Planning Officers may not have the time to respond but have stated that they appreciate receiving the maps and requests for consultation.

Evidence of Good Practice:

The pre-roll out and pre-application consultation was combined and multiple sites applications submitted simultaneously. This allowed:

- alternative sites to be suggested and their impact on the big picture understood.
- reduced levels of consultation and correspondence with the LPA as all sites are considered at once.
- allows sufficient time for consultation by both the Agent and the LPA.

Recommendations

Consider sending maps of sites to the LPAs which are not marked “commercial in confidence” to allow Planning Officers to assist in identifying potential site share opportunities within their area.

Continue to offer Annual Review meetings with the LPA and consider offering joint Operator meetings to facilitate Local Planning Officers’ understanding of the potential impact of the Operators’ plans in their areas.

Request feedback from Local Planning Officers on the annual and pre-roll out Consultations and address their concerns regarding effectiveness and usefulness of the information provided.

Tie individual applications in to the annual/pre-roll out consultation information to allow Local Planning Officers to understand their context. (The reader is referred to the Code of Best Practice Appendix F, Section 2).

Consider working with Local Planning Officers to address their concerns regarding their lack of technical expertise which prevents them from understanding the information provided to them as part of the pre-roll out consultation process.

4.1.2 Overall UK Performance – Stage 2,3 and 4

Site Selection and Planning Model ¹		UK Performance	Performance by Traffic Light Rating ²	
Stage	Essential		Green	Amber / Red
2.A.1	Check LPA Mast Register ³	39%	45%	35%
2.A.1	Obtain information and examine existing databases (e.g. MSA)	48%	54%	45%
2.A.1	Allocate Initial Traffic Light Rating	91%	N/A	N/A
2.A.1	Has reasoning been produced for Traffic Light Model Rating?	78%	77%	82%
2.A.2	Identify the LPA case officer that will be dealing with the application	90%	89%	93%
2.A.2	Offer a pre-application meeting to the LPA	42%	43%	45%
2.A.2	Record the LPA Case officer's views in Consultation Plan	17%	17%	18%
2.A.2	Identify areas of concern, discuss and agree where possible community consultation strategy	47%	44%	53%
2.A.3	Re-appraise Traffic Light Rating	7%	6%	10%
2.A.4	Identify Consultation Strategy	25%	21%	36%
4.A.1	Complete standard planning application template	94%	96%	92%
4.A.1	Provide standard Supporting Information including ICNIRP Certificate	91%	91%	94%
Stage	Essential if red/amber			
3.A.1	Letter to Ward Councillor	N/A	N/A	51%
3.A.2	Letter to Parish Council Clerk ⁴	N/A	N/A	27%

Notes

- 1 All percentages are reported based on the premise that evidence of performance of the components were found on the Agents' site files reviewed.
- 2 Commentary on Performance by Traffic Light Rating is covered in Section 3.1.5 of this report.
- 3 If the site file reviewed noted that there was no LPA Mast Register then this was excluded from the denominator.
- 4 The denominator excludes sites located in areas where there are no Parish Councils.

Implementation Review of the Ten Commitments
September 2001 – August 2002

Site Selection and Planning Model		UK Performance	Performance by Traffic Light Rating	
Stage	Optional		Green	Amber / Red
2.B.1	Tour of options with LPA	12%	12%	13%
3.B.1	Consultation Letter Mail Shot to public living in the area – local stakeholders & interest groups	30%	21%	44%
3.B.2	Erect Voluntary Site Notice	11%	11%	13%
3.B.3	Informal 'Drop in' session	2%	1%	4%
3.B.4	Key Stakeholder Briefing Session	4%	1%	6%
3.B.5	Leaflets to be deposited in community venues	2%	2%	3%
3.B.6	Public Notice in the local press – describe proposal	4%	2%	8%
4.B.1	Site Meeting with planning officer offered	19%	19%	22%
4.B.1	Site Meeting with planning officer taken up ¹	55%	47%	69%
4.B.2	On site Visual Demonstration offered	4%	4%	6%
4.B.2	On site Visual Demonstration given ¹	19%	15%	35%
4.B.3	Attend Planning Committee meeting ²	11%	7%	18%

Notes

- 1 These percentages represent the number of site meetings / demonstrations which actually took place following the offer of a meeting / demonstration being made.
- 2 This can only occur for full planning or prior approval applications which have been submitted. Licence notifications have been excluded as have any sites which have not reached the planning application submission stage.

No party other than MOA and the Operators is entitled to rely on this report for any purpose whatsoever. No interpretation of this report should be made without reading it in its entirety. Any reliance any such party may seek to put on the Report is entirely at its own risk.

Stage 2: Site Selection and Identify Consultation Strategy

All components, other than providing a Tour of Options to the Planning Officer, are Essential components which should be performed for all sites.

The highest scores in this area relate to providing an Initial Traffic Light Model Rating (91%), recording the LPA case officer who will be dealing with the application (90%) and providing reasoning for Traffic Light Ratings for all sites (78%).

The components with the lowest levels of performance relate to Re-appraising the Traffic Light Rating (7%), Recording the LPA case officer's views in the Consultation Plan (17%) and Identifying Consultation Strategy (25%).

2.A.1 Information Gathering and Site Identification

'Check LPA Mast Register'

Reasons given by the Agents for not checking the LPA Master Register include:

- Not all LPAs maintain a mast register. In the Mori poll of 2001, only 52% of LPAs polled claimed to have a mast register. In 2002 this had increased to 68%.
- The site may be pre-determined, for example upgrades to existing sites or modification of existing sites for sharing with another operator.

'Examining existing databases'

Reasons given by Agents for not examining existing databases, such as the MSA database or www.site-share-olo.com are:

- Concerns regarding the accuracy of data provided in site-share databases as unable to find known sites in it, so therefore felt need to be worth checking.
- The site may be pre-determined, for example upgrades to existing sites or modification of existing sites for sharing with another operator.

'Number of potential sites identified in search areas'

This review found the following number of site options being identified for sites in the sample:

Sites identified in Search areas	% of total
1	34%
2	14%
3	18%
4	12%
5	8%
>5	14%

This indicates that, based on our sample, more than one site was considered as an option in two thirds of cases.

This has been an area of particular concern for local communities and the National Pressure Groups who are concerned that the Operators are inflexible in identifying mutually acceptable siting options.

Some of the cases where only one option was identified related to site shares on existing site options, and hence are not relevant in these situations.

Evidence of more than one option may have been lost due to poor recording of the all options considered by the Operator or Agent on the site files. In interviews Planning Officers commented on lack of evidence of site options in planning applications.

Recommendations

Reiterate to Agents the need to maintain clear records of the potential sites identified in the search area and the reasons for choosing and proceeding with particular sites especially where they have been allocated a Red or Amber Traffic Light Rating.

Consider providing clear explanations (both technical and non-technical) for proceeding with alternative and/or suggested sites in planning applications.

‘Allocate Initial Traffic Light Model Rating’

All potential sites should have an initial Traffic Light Model rating allocated to them. This occurred in 91% of all sites reviewed and reasoning for the rating allocated was provided in 78% of sites.

A number of issues were identified with the use of the Traffic Light Model (‘TLM’) identified during the review of site files and during interviews with Agents and included:

- Agents using a different version of the TLM to that on the MOA website. Instead, they have used either Operator or Agent developed versions.
- The rating applied to the site may not correspond to the recorded scores.
- Some Traffic Light Ratings sheets used do not provide space for any comments other than the numerical scores, resulting in the reasoning for TLM scores not being recorded.
- A lack of evidence that the Traffic Light Rating has been produced through a systematic consideration of the community and planning axes.
- Evidence that Agents do not provide a Traffic Light Rating for temporary sites.
- Traffic Light Rating on file missing a signature or date (or both), leaving no audit trail to confirm when the rating was allocated.
- License Notification sites and shared sites have a higher likelihood of being rated Green, which does not seem to take account of community or planning issues, as required under the Traffic Light Model.

- One of the operators has decided to tailor the application of Amber Traffic Light Ratings by splitting the Amber scores so that some are treated as a Green site despite having traffic light ratings that are Amber, resulting in a lower level of consultation occurring than the Traffic Light Model guidelines suggest.

At least one Agent has found that in early 2002 Operators who were site sharing on an existing mast rated the site Green, without performing a full Traffic Light Model assessment on the site, and hence did not apply the remaining elements of the Site Selection and Planning Model or the Ten Commitments. This may result in lower levels of consultation being undertaken in a community than a non-site share mast would have required.

Recommendations

Reinforce the use of the MOA standard Traffic Light Model for all potential sites to ensure all sites are consulted on using consistent criteria.

Clarify that the Traffic Light Model does not apply to temporary sites.

Consider performing sensitivity tests on the Traffic Light Model's scoring system to help in refining the guidelines for rating sites. The current Traffic Light Model guidelines are subjective can be interpreted in a variety of ways, which may result in sites being "under-rated".

2.A.2 LPA Consultation and Opinion

Whilst there is evidence of consultation with LPA case officers on site files, both formal and informal, there is low implementation of discussing and recording agreed Consultation Strategy (47%) by the Planning Officers and in identifying the consultation strategy (25%) (step 2.A.4).

There were a high percentage of instances where documented Consultation Plans and Consultation Strategies were not on file. In only 25% of all files reviewed was there evidence available of the Consultation Strategy being documented.

'Identify the LPA case officer that will be dealing with the application'

Where the LPA case officer has been identified a record of the name of the case officer is on file. In 90% of the cases we reviewed, the case officer was identified and further progress had been made towards an application or notification for planning. It should be noted that the name of the case officer may have been recorded on file subsequent to the pre-application consultation having occurred.

This finding is reflected in claims from several Planning Officers interviewed that in some cases formal applications "just appear in the mail" without prior notice or consultation. This may be due to lack of communication between the Operators and the Planning Officers.

‘Identify areas of concern, discuss and agree where possible community consultation strategy’

Agents stated that input from Planning Officers on the Consultation Strategy for a site included:

- Planning Officer indicated undesignated areas within the cell area where high levels of concern may exist with local residents.
- Planning Officer suggested pre-application consultation with certain schools.
- Agent acted on advice from the Planning Officer and set up a site meeting with local residents to give them a greater understanding of the proposed development.

Recommendation

Require Agents to formally document discussions with Planning Officers regarding Consultation Strategy. The agreed Consultation Strategy should be formally recorded and its implementation documented on file.

Clarify the wording of the Site Selection and Planning Model as not all consultation strategies will be agreed by all stakeholders.

2.A.2 and 2.A.4 Offer a pre-application meeting

‘Pre-application Meetings and LPA responses’

Only 42% of site files indicated that a pre-application meeting had been offered to the Local Planning Authority. Reasons given by Agents for pre-applications meetings not taking place include:

- Local Planning Officer does not reply to the offer;
- Local Planning Officer declines the offer of a meeting for various reasons; and
- Agent does not attempt to consult the Local Planning Officer since they ‘believe’ that the Local Planning Officer will approve / decline the application regardless.

Planning Officers interviewed during the course of this review attributed the reasons for pre-application meetings not taking place to the lack of time, and resource, available to the Local Planning Officer to engage in pre-application discussion with Agents. However, both parties agree Planning Officers do communicate with Agents on important or contentious cases. Some Planning Officers stated that they welcomed the offer of a pre-application meeting from the Agents even though often they could not take up these offers. Several Planning Officers commented that they found pre-application telephone conversations, emails, faxes and correspondence as useful as pre-application meetings and often more convenient.

At least one Agent explained that any pre-application consultation that has already occurred on a site share should be passed between the Incoming Operator’s Agent to the Outgoing Operator’s Site Share Agent. This does not always happen and the Outgoing

Operator's Agent may not be aware of any pre-application consultation that may have already occurred unless they contact the LPA to initiate it.

During interviews with Agents, it was explained that they felt drawings of the proposed site facilitated understanding of the impact of the proposed development. This was reflected by comments from several Planning Officers interviewed. For example, in many urban areas, identification of the site through a map location is felt to be of less value than drawings, as Planning Officers are concerned as to what the development will look like.

There are instances quoted by both Agents and Planning Officers when insufficient time was allowed to consider drawings before the formal application was submitted.

Recommendations

Continue to offer Local Planning Officers pre-application meetings for all sites, regardless of the history of response from specific LPAs.

Contact Planning Officers by telephone, email, fax or correspondence as alternatives to pre-application meetings to allow their feedback and participation in the pre-application consultation process –perhaps agree preferred mechanism with individual offices.

Reiterate to Agents the need for all information on any pre-application consultation, which has taken place, on potential site share options and/or within the relevant search areas to be forwarded to the relevant Outgoing site share Agent.

Consider providing Planning Officers with drawings of the potential sites at an early stage to facilitate the Planning Officers' assessment of the potential impact of a site in an area.

Ensure that sufficient time is provided to the Planning Officers to review these drawings. The definition of "sufficient time" should be agreed between the Operators and the Planning Officers.

'Record the LPA Case Officers' views in Consultation Plans'

There was little evidence of Consultation Plans being kept on file, although comments from the Planning Officers were usually kept on file as letters or telephone notes. Examples of consultation with Planning Officers include:

- Discussions of potential site shares that the Agent had not already identified.
- Collaborating on developing an effective site design, to minimise residential and council objections.

Recommendation

Reiterate the use of the Consultation Plan to record the views of the Planning Officers during the pre-application consultation stage.

2.A.3 Site Selection

‘Re-appraise Traffic Light Rating’

The Traffic Light Rating should be re-appraised following the discussion of the consultation strategy with the LPA case officer and the selection of the preferred option. However, occurrences of this happening were rare (only 7% of cases) and when it did happen, were not clearly documented to enable the identification of the timing of when it was re-appraised.

In general, no written justification was provided when the Traffic Light Rating was re-appraised or changed.

The lack of evidence of justification or re-appraisal of Traffic Light Rating may be attributed to poor record keeping by some Agents and in some instances these components could have been carried out.

Recommendation

Re-iterate to Agents the need to record the TLM rating and re-appraise it for all potential sites until the preferred option is identified. Agents should be encouraged to retain all documentation relating to the potential options and TLM ratings of sites.

Clarify intent to all stakeholders regarding the purpose of the Traffic Light Rating. Community representatives and National Pressure Group, currently interpret Red/Amber ratings as meaning alternative sites should be found, however, the current wording of the model indicates that only more consultation is needed. (The reader is referred to the Code of Best Practice).

2.A.4 Identify Consultation Strategy

See 2.A.2 for comments.

2.A.5 Pre-application meeting offer

See 2.A.2 for comments.

2.B. 1 Tour of Options (Optional)

In interviews with Planning Officers, none cited a case where a tour of options would have been beneficial.

Planning Officers all claimed to make a visit to at least the preferred site at some stage without the Agent or Operator present. Although Agents and Planning Officers interviewed supported this action when justified, both parties also mentioned

Evidence of Good Practice:

- When a file has been taken over from another Agent, the ratings and potential sites were re-evaluated, recognising the fact that the environment may have changed since the initial search.
- On discovery of a nursery being held within the nearby church, the Traffic Light Rating was changed from green to red, and further pre-application consultation was undertaken.
- In one instance reappraisal was performed for each of the 7 times that the preferred option was changed.

photomontages as viable alternatives to tours and considered this would save time and resource and still give the same beneficial effect.

Recommendation

Consider providing Planning Officers with photomontages of the site options and preferred site as well as or as an alternative to the tour of options.

Stage 3: Community Consultation

The components within Stage 3.A are Essential only to Amber or Red rated sites. However, there has been low implementation of the components, with letters being sent to only 51% of Ward Councillors and 27% of Parish Council Clerks overall.

There has been a very low implementation of the Optional components within Community Consultation and there is little difference in performance between Green and Amber/Red sites.

Several Agents and Local Planning Offices stated that they had general concerns about the usefulness of general consultation, as it often caused more attention to be drawn to applications than was warranted.

Recommendation

Train Agents in consultation strategies and clarify when to initiate them. This training should reinforce that consultation is a two way dialogue and that community response must be seen to be taken into consideration.

Stage 3: Community Consultation

3.A.1 and 3.A.2 Letter to Ward Councillor, Letter to Parish Council Clerk (or appropriate National variations)

The information provided in these pre-application letters varies depending on the Agent and Operator from which they were developed. All letters to Ward Councillors and Parish Councils are sent by Agents.

On occasions when Ward or Parish Councillors objected to the Operators' preferred sites correspondence was sent by the Councillors which put forward what they considered to be preferable alternative sites.

Agents stated that there were specific instances where the Planning Officer had asked them not to carry out pre-application consultation with Ward or Parish Councillors, or with local stakeholders. It should be noted that this is within the MOA guidelines for the Site Selection & Planning Model, as stated on the MOA website, but the fact that this advice has been received should be recorded in the site files.

In many instances Agents' remuneration did not reflect commitment to and implementation of the Ten Commitments.

At least one of the local councillors we interviewed during our review highlighted that members of the Planning Committee were not allowed to attend community meetings as it could bias them prior to the application submission. The reader is referred to the Nolan Report on Standards in Public Life (1997).

Recommendations

Consider reviewing and linking to the implementation of the Ten Commitments the Agents' remuneration.

Reiterate the need for Ward Councillors and Parish Council clerks to receive consultation letters for all Amber/Red sites unless otherwise advised by the LPA.

3.B.1 Consultation letter Mail Shots

Where letters were sent, they generally went to local residents, schools and churches.

Evidence of good practice:

- For one site 71 pre-application letters were sent to local residents, resulting in 55 letters and 2 petitions being received back.
- Comprehensive letters and information packs sent to specific residents that had concerns about radio interference.

Some local communities have developed lists of local community contact details to assist the Operators, and their Agents, in identifying the key contacts for correspondence for any pre-application consultation.

Although, Operators and their Agents would then tend to only consult with the nominated contacts sometimes omitting the other community members who should be contacted as part of the process.

Recommendations

Provide clear guidelines to Agents as to whom is expected to be consulted for all sites.

Encourage Agents to obtain and use local contact details of community representatives where available.

Ensure Agents employ consultation strategies that go beyond merely informing community representatives of intended plans and that when feedback is received it is considered in future plans and activities.

3.B.2 Erect Voluntary Site Notice

11% of sites reviewed had evidence of voluntary site notices being erected. It would appear from interviews with Planning Officers and local communities that these are used only for sensitive sites.

Recommendation

Maintain evidence of any site notices erected in site files.

3.B.3 Informal ‘Drop In’ Session

During interviews with local community representatives it was noted that some communities felt that drop in sessions, when arranged, were not well publicised so operators found attendance low.

Recommendation

Ensure all drop in sessions are publicised on a wider basis to allow communities to take advantage of them.

3.B.4 Key Stakeholder Briefing Session

Examples of where these occurred are:

- School meetings to address concerns of parents and governors (several examples of this).
- A meeting set up for public services staff who work near the proposed site.

Recommendation

Ensure all stakeholder briefing sessions are publicised on a wider basis to allow interested stakeholders to participate in them.

3.B.5 Leaflets

There was little evidence on site files that leaflets had been deposited in community venues. However, interviews with local community representatives found that many of them had received or seen Operator leaflets, particularly in relation to contentious sites.

Recommendation

Maintain evidence of any leaflets provided to communities on site files.

3.B.6 Public Notice Placed in Local Press

There was little evidence of local press notices on site files although evidence of adverse press coverage was found in a number of site files. However, an example of where it occurred is:

- For a simultaneous application for multiple sites in one area, the LPA and Agent worked together in organising community consultation and as part of this consultation, issued a press release detailing the proposed scheme.

Recommendation

Consideration should be given to increasing the use of the local press as a method of communicating Operator site plans to local communities.

Other

Interviews with the Operators and the Planning Officers during this review indicate that the site files do not reflect the level of work being performed by the Operators and their

Agents to perform consultation. All the Operators have communication officers to represent them and liaise with community representatives and LPAs.

Recommendation

Reiterate to all parties the need to retain complete documentation on site files detailing all contact made, and the outcome of any contact, with LPAs and community groups. Without complete documentation on files it is not possible to ascertain a full picture of the consultation performed.

General recommendation for Stages 2 and 3

Consider developing additional supporting training and tools to Agents to facilitate and support them in implementing the Ten Commitments.

Stage 4 Planning Submission

This Stage details Essential components for all planning applications as well as Optional components to take following the submission of the planning application. Overall the conformance with the requirements was high regarding the submission of standard documentation for planning applications (94%) and providing standard supporting information (91%).

All Agents visited had standard formats for supporting information to be included with planning submissions and permitted development notifications but we noted a number of variations in detail between Operators and between Agents. Whilst some of these formats followed the MOA template, others had different standard letter layouts although these still addressed many of the same issues. The standard template on the MOA website has also changed in some minor respects since the Ten Commitments were launched and may have resulted in a number of variations of format and detail of supporting information in the field.

For an overview of planning terms, please refer to the Glossary.

For applications requiring **Full Planning** approval, the following was found in the examples reviewed:

All documentation reviewed contained:

- Site details providing full address and postcode of the proposed site.
- ICNIRP certificate provided
- An explanation of the licence obligations was given and/or reasons for the particular cell as technical justification.
- A comment on alternative sites considered was included in the description of the site selection process. However, when the application is for an upgrade, a site share of an existing site or a re-application following a refusal, the full description

of alternatives is often referenced to other correspondence rather than included with the submission.

The majority of documentation reviewed contained:

- The pre-application consultation with LPA and other local stakeholders was mentioned in the Pre-Application Checklist.
- A reasonably detailed description of the proposal including the equipment required described in the proposed development. Reasons for the design choice and maps showing coverage plots were generally included.
- Coverage plots provided in the Technical justification, sometimes accompanied by a clear explanation of how the plots should be interpreted

A smaller proportion of the site files reviewed contained:

- Site details including National Grid Reference
- A Pre-Application Checklist including all the details specified on the Site Selection and Planning Model.
- Only a few of the standard layouts reviewed included details of frequency and power output within the technical information.

Evidence of Good Practice:

The following additional information was included in some of the reviewed standards for Full Planning applications:

- Photo / photomontage of site
- Details of National Planning Policy Considerations
- Government Guidance on health issues
- Explanation of ICNIRP Guidelines
- Emission profile
- Audio noise Levels
- Traffic Light Rating

For applications for **Prior Approval**, the following was found in the examples reviewed:

All documentation reviewed contained:

- Site details providing full address and postcode of the proposed site.
- ICNIRP certificate provided as technical information.
- Reasons for the particular cell were given within technical justification

The majority of documentation reviewed contained:

- A reasonably detailed description of the proposal including the equipment required described in the proposed development. Maps and coverage plots were included in approximately half the examples reviewed, fewer than with Full Planning.

- An explanation of the Operator's licence obligations was included within technical justification. Coverage plots were included in approximately half the examples, and sometimes accompanied by a clear explanation of how the plots should be interpreted.
- A full explanation of multiple alternative sites considered was included within the description of the site selection process.

A smaller proportion of the site files reviewed contained:

- Site details including National Grid Reference (NGR).
- Only a few of the standard layouts reviewed included details of frequency and power output.

None of the documentation reviewed:

- Included any description of the pre-application consultation with LPAs or other stakeholders.

License Notification

A small number of examples of standard formats for supporting information for License Notifications were reviewed. The standard was generally consistent and included:

- Description of proposed development
- Drawings of proposed development
- ICNIRP certificate

Evidence of Good Practice:

Examples standard was significantly more comprehensive and, in addition to the above, included:

- Reference to other sites investigated
- Justification for site
- Coverage plot

Evidence of Good Practice:

The following additional information was included in some of the reviewed standards for Prior Notification of permitted development:

- Photo / photomontage of site
- Details of National Planning Policy Considerations
- Government Guidance on health issues
- Explanation of ICNIRP Guidelines
- Emission profile

All Planning Officers interviewed were generally satisfied with the level of supporting information submitted with planning submissions for full planning or prior approval. Many of the adverse comments from Planning Officers related to the quality of the drawings supplied. Whilst this is not strictly within the remit of the Ten Commitments, they are included here to assist with the consideration of any improvements.

The most frequently cited comments from Local Planning Officers were:

- Poor identification of the site location;
- Poor quality of drawings;
- A request for more use of photomontage;

- A request for more explanation of coverage plots; and
- Detailed technical information was unnecessary in the opinion of some Planning Officers

Furthermore, nearly all Planning Officers interviewed were satisfied that ICNIRP certificates were supplied with planning submissions and notifications of prior approval. A few commented that on the rare occasions when these were missing the Agent or Operator rapidly responded with the required certificate.

Recommendations

Consider including the additional information detailed as the good practices for each planning type in the appropriate standard information provided for all applications.

Provide Planning Officers with supporting information for Licence Notifications submitted.

4.B.1 Site Meeting with Planning Officer

‘Site Meeting’

Site meetings were offered for 19% of sites reviewed. Of these meetings offered 55% were taken up by the Planning Officers.

4.B.2 On site Visual Demonstration

‘On Site Visual Demonstration’

4% of sites reviewed had an onsite visual demonstration offered. Of these demonstrations offered only 19% of them were taken up by LPAs or community representatives.

Local Planning Offices report infrequent offers for on site visual demonstration although they had widely divergent views on whether these were useful or not.

4.B.3 Attend Planning Committee Meeting

In 11% of sites reviewed had evidence that the Planning Committee meeting was attended. However, it should be noted that not all applications would have gone to planning committee, and there was poor record keeping on files as to whether Agents and/or Operators had been invited to attend planning committee meetings, and whether they had attended.

4.1.3 Performance over time – 2001 and 2002

Site Selection and Planning Model ¹		Performance by Quarter	
		Q4 2001	Q1, 2, 3 2002
Stage	Essential		
2.A.1	Check LPA Mast Register ²	48%	36%
2.A.1	Obtain information and examine existing databases (e.g. MSA)	48%	48%
2.A.1	Allocate Initial Traffic Light Rating	83%	89%
2.A.1	Has reasoning been provided for Traffic Light Model Rating?	68%	79%
2.A.2	Identify the LPA case officer that will be dealing with the application	90%	89%
2.A.2	Offer a pre-application meeting to the LPA	44%	40%
2.A.2	Record the LPA Case officer's views in Consultation Plan	17%	17%
2.A.2	Identify areas of concern, discuss and agrees where possible community consultation strategy	33%	46%
2.A.3	Re-appraise Traffic Light Rating	4%	8%
2.A.4	Identify consultation strategy	17%	24%
4.A.1	Complete standard planning application template	94%	94%
4.A.1	Provide standard Supporting Information including ICNIRP Certificate in Planning Submission	81%	93%

Notes

- 1 All percentages are reported based on the premise that evidence of performance of the components were found on the Agents' site
- 2 If the site file reviewed noted that there was no LPA Mast Register then this was excluded from the denominator.

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Site Selection and Planning Model		Performance by Quarter	
		Q4 2001	Q1, 2, 3 2002
Stage	Optional		
2.B.1	Tour of options with LPA	17%	9%
3.B.1	Consultation Letter Mail Shot to public living in the area – local stakeholders & interest groups	24%	32%
3.B.2	Erect Voluntary Site Notice	14%	11%
3.B.3	Informal 'Drop in' session	0%	2%
3.B.4	Key Stakeholder Briefing Session	2%	3%
3.B.5	Leaflets to be deposited in community venues	0%	2%
3.B.6	Public Notice in the local press – describe proposal	0%	5%
4.B.1	Site Meeting with planning officer offered	16%	18%
4.B.2	Site Meeting with planning officer taken up	33% ¹	56% ¹
4.B.2	On site Visual Demonstration offered	5%	4%
4.B.2	On site Visual Demonstration given	14% ¹	19% ¹
4.B.3	Attend Planning Committee meeting	8% ²	11% ²

Notes

- 1 This percentage represents the number of site meetings / demonstrations which actually took place following the offer of a meeting/ demonstration being made.
- 2 This can only occur for full planning or prior approval applications which have been submitted. Any licence notifications have been excluded as have any sites which have not reached the application submission stage.

No party other than MOA and the Operators is entitled to rely on this report for any purpose whatsoever. No interpretation of this report should be made without reading it in its entirety. Any reliance any such party may seek to put on the Report is entirely at its own risk.

The Ten Commitments were introduced in August 2001 and the timeframe of the review covered 1st September 2001 to 12th August 2002. As such, the review concentrated on the very early stages of the incorporation of the Ten Commitments into the planning and site selection procedures of the Operators. As with any significant change in guidance or self-regulation it takes time for changes to be implemented.

The results have been separated between sites for which planning applications were submitted in 2001 and those which were submitted in 2002. Due to the qualitative nature of the sampling only large differences in performance should be read as having any meaningful significance.

In 7 out of 14 of the Essential components (including Essential for Red/Amber rates) there is an improvement in the implementation of these components.

There was a slight increase in the implementation of the Optional components of the Site Selection and Planning Model in 2002, although there was generally low implementation of the Optional components in both 2001 and 2002.

Anecdotal evidence from Local Planning Offices and Local Community groups indicates that recent relationships have improved in many instances and that various parties appear to have found ways of working together.

The results generally reflect the improved levels of consultation from the Operators (or their Agents) to the local community representatives. Discussions with local community representatives indicate that since the period under review there has been increased consultation and they are pleased with the increased consultation and communication between themselves and the Operators.

3.1.4 Performance by UK region

Site Selection and Planning Model ¹		Performance by UK Region				Overall UK Average
		England	Wales	Scotland	Northern Ireland	
Stage	Essential					
2.A.1	Check LPA Mast Register ²	41%	80%	25%	41%	39%
2.A.1	Obtain information and examine existing databases (e.g. MSA)	52%	75%	26%	45%	48%
2.A.1	Allocate Initial Traffic Light Rating	93%	100%	83%	87%	91%
2.A.1	Has reasoning been produced for Traffic Light Model Rating?	82%	45%	71%	90%	78%
2.A.2	Identify the LPA case officer that will be dealing with the application	88%	94%	95%	96%	90%
2.A.2	Offer a pre-application meeting to the LPA	42%	47%	46%	23%	42%
2.A.2	Record the LPA Case officer's views in Consultation Plan	23%	16%	0%	0%	17%
2.A.2	Identify areas of concern, discuss and agree where possible community consultation strategy	54%	50%	29%	29%	47%
2.A.3	Re-appraise Traffic Light Rating	7%	6%	9%	4%	7%
2.A.4	Identify Consultation strategy	34%	28%	1%	15%	25%
4.A.1	Complete standard planning application template	92%	100%	99%	96%	94%
4.A.1	Provide standard Supporting Information including ICNIRP Certificate in Planning Submission	90%	67%	100%	87%	91%

Notes

- 1 All percentages are reported based on the premise that evidence of performance of the components were found on the Agents' site
- 2 If the site file reviewed noted that there was no LPA Mast Register then this was excluded from the denominator.

Implementation Review of the Ten Commitments
September 2001 – August 2002

Site Selection and Planning Model		Performance by UK Region				Overall UK Average
		England	Wales	Scotland	Northern Ireland	
Stage	Optional					
2.B.1	Tour of options with LPA	14%	18%	7%	5%	12%
3.B.1	Consultation Letter Mail Shot to public living in the area – local stakeholders & interest groups	22%	7%	57%	33%	30%
3.B.2	Erect Voluntary Site Notice	15%	40%	1%	0%	11%
3.B.3	Informal 'Drop in' session	3%	0%	2%	0%	2%
3.B.4	Key Stakeholder Briefing Session	4%	0%	1%	13%	4%
3.B.5	Leaflets to be deposited in community venues	3%	0%	0%	0%	2%
3.B.6	Public Notice in the local press – describe proposal	3%	0%	3%	25%	4%
4.B.1	Site Meeting with planning officer offered	19%	0%	16%	40%	19%
4.B.2	Site Meeting with planning officer taken up ¹	50%	100%	81%	14%	55%
4.B.2	On site Visual Demonstration offered	5%	7%	3%	0%	4%
4.B.2	On site Visual Demonstration given ¹	15%	50%	100%	0%	19%
4.B.3	Attend Planning Committee meeting ²	12%	0%	9%	7%	11%

Notes

- 1 This percentage represents the number of site meetings / demonstrations which actually took place following the offer of a meeting / demonstration being made.
- 2 This can only occur for full planning or prior approval applications which have been submitted. Any licence notifications have been excluded as have any sites which have not reached the application submission stage.

No party other than MOA and the Operators is entitled to rely on this report for any purpose whatsoever. No interpretation of this report should be made without reading it in its entirety. Any reliance any such party may seek to put on the Report is entirely at its own risk.

When interpreting the UK regional results it is important to note that there are regional planning variations that affect the implementation of the Ten Commitments. These variations mean that the legislation for England and Wales is comparable whereas that of Scotland and Northern Ireland are both standalone.

It should be noted that the regional splits of the data as presented do not reflect the regional divides used by the Operators, as these vary across each Operator. However, the national regions presented not only reflect the variances in planning legislation but also national stakeholder groups and wider reader expectations and understanding.

Community Consultation

This stage of the model requires the following essential activities to be carried out for sites that are rated Amber or Red in the TLM, (only one is applicable in Northern Ireland) namely:

- Letter to Ward Councillor (or Local Councillor in Scotland); and
- Letter to Parish Council Clerk (or Community Council Clerk in Scotland and Wales, not applicable in Northern Ireland).

England

In general the results for England are in line with the overall national average and therefore the overall comments in Section 3.1.4 apply.

Wales

There is substantially higher performance than the National Average (Section 3.1.2) in key areas of the components such as:

- checking the LPA Mast Register (80%);
- obtaining information and examining existing databases (75%); and
- erecting voluntary site notices (40%).

However, there are areas of substantially lower or no recorded performance in some components. The review of sites did not find any evidence of Optional components in Stage 4 and most of Stage 3 occurring. Key Essential components with low performance include providing reasoning for Traffic Light Rating (45%) and providing standard Supporting Information including ICNIRP certificates in planning submissions (67%).

Scotland

Significantly higher performance than the overall UK performance results was seen in the following components:

- performing consultation letter mail shot (57%); and
- taking up of site meeting by planning officer (81%).

Components where there is substantially lower or no recorded performance include:

- identification of areas of concern and agree possible community consultation strategy (29%);
- obtain information and examine existing databases (26%);
- record the LPA case officer's views in consultation plan (0%);
- erect voluntary site notices (0%); and
- identify consultation strategy (1%).

The reader's attention is drawn to the community consultation regime in Scotland called "Neighbour Notification" which may account for a higher figure in consultation letter mail shots.

Northern Ireland

Implementation in Northern Ireland is substantially higher than the overall UK performance results in the following components:

- send letter to Ward Councillor (54%);
- place public notice in the local press describing proposal (25%); and
- site meeting with planning officer offered (40%).

Implementation of the following components is substantially lower than the overall UK average:

- site meeting with planning officer taken up (14%);
- offer a pre-application meeting to the LPA (23%);
- record the LPA case officer's views in consultation plan (0%);
- identify consultation strategy (15%);
- identify areas of concern and agree possible community consultation strategy (29%); and
- no evidence of an on site demonstration having been offered.

It is difficult to draw any detailed conclusion on the reasons for these variances but the overall recommendation stands – making a concerted effort is required to ensure the Commitments are applied fully.

3.1.5 Performance by Traffic Light Model Rating

Site Selection and Planning Model¹		Performance by Traffic Light Rating	
Stage	Essential	G	A/R
2.A.1	Check LPA Mast Register ²	45%	35%
2.A.1	Obtain information and examine existing databases (e.g. MSA)	54%	45%
2.A.1	Has reasoning been produced for Traffic Light Model Rating?	77%	82%
2.A.2	Identify the LPA case officer that will be dealing with the application	89%	93%
2.A.2	Offer a pre-application meeting to the LPA	43%	45%
2.A.2	Record the LPA Case officer's views in Consultation Plan	17%	18%
2.A.2	Identify areas of concern, discuss and agree where possible community consultation strategy	44%	53%
2.A.3	Re-appraise Traffic Light Rating	6%	10%
2.A.4	Identify consultation strategy	21%	36%
4.A.1	Complete standard planning application template	96%	92%
4.A.1	Provide standard supporting information including ICNIRP Certificate	91%	94%
Stage	Essential if red/amber		
3.A.1	Letter to Ward Councillor	10%	51%
3.A.2	Letter to Parish Council Clerk ³	4%	27%

Notes

Any site where no traffic light model rating was recorded on file or the site selection process had not reached the stage of assigning a traffic light model rating was excluded from this analysis.

- 1 All percentages are reported based on the premise that evidence of performance of the steps were found on the Agents' site
- 2 If the site file reviewed noted that there was no LPA Mast Register then this was excluded from the denominator.
- 3 The denominator excludes sites located in areas where there are no Parish Councils.

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Site Selection and Planning Model		Performance by Traffic Light Rating	
Stage	Optional		
2.B.1	Tour of options with LPA	12%	13%
3.B.1	Consultation Letter Mail Shot to public living in the area – local stakeholders & interest groups	21%	44%
3.B.2	Erect Voluntary Site Notice	11%	13%
3.B.3	Informal 'Drop in' session	1%	4%
3.B.4	Key Stakeholder Briefing Session	1%	6%
3.B.5	Leaflets to be deposited in community venues	2%	3%
3.B.6	Public Notice in the local press – describe proposal	2%	8%
4.B.1	Site Meeting with planning officer offered	19%	22%
4.B.2	Site Meeting with planning officer taken up ¹	47%	69%
4.B.2	On site Visual Demonstration offered	4%	6%
4.B.2	On site Visual Demonstration given ¹	15%	35%
4.B.3	Attend Planning Committee meeting ²	7%	18%

Notes:

Any site where no traffic light model rating was recorded on file or the site selection process had not reached the stage of assigning a traffic light model rating was excluded from this analysis.

- 1 This percentage represents the number of site meetings and/or demonstrations which actually took place following the offer of a meeting and/or demonstration being made.
- 2 This can only occur for full planning or prior approval applications which have been submitted. Any licence notifications have been excluded as have any sites which have not reached the application submission stage.

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Amongst the Essential components of Stage 3 of the Site Selection and Planning Model there has been a surprisingly low implementation of pre-consultation with the Ward and Parish (or regional equivalent) Councillors than would be expected for Essential components (only 51% and 27% for Amber/Red sites), given the higher performance in other Essential components.

Amongst the Optional components of the Site Selection and Planning Model it appears that there is little differentiation between the implementation of these for Green and Amber/Red sites. Significant differences to the overall UK performance are:

- higher performance for Amber/Red sites in sending consultation letter mail shots for Amber/Red sites (44%);
- higher uptake of site meetings by planning officers for Amber/Red sites (69%);
- higher uptake of by planning officers on site visual demonstrations for Amber/Red sites (35%); and
- higher attendance at planning committee meetings for Amber/Red sites (18%).

However, it should be considered that the Optional components within the Site Selection and Planning Model may not be appropriate for all site applications. The pre-consultation and application progress of the individual sites included within our sample may also mean that the Operator (or its Agent) felt that the site had not progressed to a point where these Optional components were required at the time of our review.

4.2 Findings regarding other Commitments

4.2.1 Commitment 3: Publish clear, transparent and accountable criteria and cross industry agreement on site sharing, against which progress will be published regularly

There are three elements to this commitment:

- **Publish clear, transparent and accountable criteria**
- **A cross-industry agreement on site-sharing**
- **Publish regularly progress against the above**

Publish clear, transparent and accountable criteria:

Whilst progress has been made in some areas of the site share commitment there appears to be little in the way of clear, transparent and accountable criteria on site sharing. This is reflected in the findings from the interviews conducted with the Local Planning Officers who expressed a concern that they were told ‘technical’ reasons existed that explained why a particular site could not be shared. The site share process is subject to complex service level agreements between the Operators although recent efforts appear to have facilitated the process it remains an area of complexity and where reasons for specific actions remain hidden in the eyes of the community and the planning officers.

Recommendation:

It is recommended that criteria are published that will allow Local Planning Officers, Agents and interested stakeholders to understand the technical and commercial decision making criteria upon which sites can or cannot be shared.

A cross-industry agreement on site-sharing:

A cross-industry Site Share Working Group has been established. During the period under review (September 2001 to August 2002) this agreement was in its early stages and the technology and support processes for this commitment were under development rather than fully operational.

Evidence of Good Practice:

Local Planning Officers and Operators holding round table discussions to identify:

- Level of detail needed on reasons why sites cannot be shared from Operators & Agents
- Areas where technical information is either unnecessary or needs explanation

Towards the end of 2002 a database and Common Service Level Agreements have been established and are being used by all five of the Operators. The Service Level Agreements specify timescales for major steps in the process of site sharing (including post application build and a standard set of charges up to build stage).

The database is now posted on a website accessible by each of the Operators (www.site-share-olo.com). Access to the website is controlled by passwords held by the operators and therefore the information is not available

to the public.

Regularly publish progress against the site share transparent criteria:

The Operators committed to publish site share performance data to the Office of the Deputy Prime Minister in England, to the Deputy Minister for Social Justice in Scotland, to the Welsh Government Environment Minister and to the Parliamentary Under Secretary of State of the Northern Ireland Department of the Environment.

The first few reports were drawn together manually and it is recognised that the data was not comprehensive as it had taken some time to gather the information together. In addition, the site share information excluded information provided by the main telecommunication mast landlords as there was not a uniform definition of site share used by these landlords and the Operators.

Action was taken during the course of 2002 to rectify this and site share data has been compiled and reported by the five mobile phone operators and by of the third party site providers.

Recommendations:

Consider publishing the site share information to a wider group of stakeholders rather than just the government bodies listed above.

The implication behind this commitment is that all stakeholders automatically assume that site share is the preferred option. This is clearly not the case and we were told by both community representatives and planning officers that in many instances the smaller and less obtrusive option of non-shared sites is preferred.

4.2.2 Commitment 4: Establish professional development workshops on technological developments within telecommunications for local authority and elected members

The Mobile Operators Association (MTAG at the time of this review) has established a programme for Local Authority Councillors and Officers. Invitations were sent to local authorities in England, Wales and Scotland. These were targeted at councillors who were chairs of Development Control or Planning and officers who headed the District Council planning functions. In total, 1006 Councillors and 440 officers were invited over the period of this review. In addition, invitations were made to Members of Parliament and the national assemblies and to invite county associations of parish councils. In total, 746 MP, MSPs and MEPs and Welsh Assembly Members and 50 County Associations of Parish Councils were invited to the events.

During the period under review (1st September 2001 to 12th August 2002) the following had workshops:

Craigavon Council (involved representative of 25 or the 26 Northern Ireland Councils)	Bristol City Council (repeat)
London Borough of Waltham Forest	Nine regionally based presentations held in London (x2), Croydon, Watford, Bristol, Cardiff, Wrexham, Leeds and Manchester
Durham City Council	London Branch of Association of Chief Estate Surveyors Portsmouth City Council
Falkirk Council	Council for National Parks
Mid Devon District Council	Three regionally based presentations held in Southampton, Newbury and Peterborough
Moray Council	Unstone Parish Council
Stirling Council	Daventry District Council
Local Authority Telecoms Network (Harrow Council)	Lancashire Association of Parish & Town Councils
Manchester City Council	Somerset County Council
The Highlands Council	Lewes District Council
Brighton & Hove City Council	Bolsover District Council
Daventry District Council (repeat	Herefordshire Unitary Authority
Shepway	Bristol City Council
South Kesteven District Council	Cambridge City Council
North Norfolk District Council	Sevenoaks Area Committee – Kent Association of Parish Councils
London Borough of Newham	Swansea City & County Council
Five regionally based presentations held in Birmingham (x2), Newcastle, Glasgow and Edinburgh	South Hams District Council
Doncaster Metropolitan Borough Council	Warwickshire & West Midlands Association of Local Councils
Convention of Scottish Local Authorities (COSLA)	Shirebook Borough Council

The format of the session is a brief presentation on some of the technical aspects of the mobile industry in the UK and and some of the issues that are typically raised by stakeholders, e.g. visual impact, potential health concerns, the Ten Commitments and some high level discussion of the UK planning regime followed by a question and answer session.

The question and answer session appears to drive the most detailed discussion and forms the main part of the workshop.

Anecdotal evidence from interviews with community representatives and feedback gathered by the MOA from the participants indicates that most attendees have found the briefings informative and useful.

Recommendation:

Consideration should be given to assessing whether given changes in the market, perception of risk and/or in regulation renewed effort is required to change the agenda/contents or invitation list whether the key targets have attended across the four regions of the UK (Northern Ireland, Scotland, Wales and England).

4.2.3 Commitment 5: Deliver, with the government, a database of information available to the public on radio base stations

We have been informed that the original aim of this database was for local communities to have visibility of sites in their local community.

A database has been established (www.sitefinder.radio.gov.uk) which provides information on all operational, externally sited, cellular radio transmitters in England, Scotland, Wales and Northern Ireland. The information provided on each site is described below.

Information provided on Sitefinder database:

Parameter	Comments
Type of transmission	This is specified in terms of the technology used. Two types of cellular technologies operate in the UK; GSM and UMTS.
Height of antenna	In terms of metres above ground level.
Frequency range	Cellular radio networks operate in one of three bands in the UK; 900 MHz, 1800 MHz and 2.2 GHz.
Transmitter power	Specified in terms of Effective Isotropic Radiated Power (EiRP dBW) per channel.
Maximum licensed power	In EiRP dBW per channel. The maximum licensed power is the highest power that would ever be permitted from a particular transmitter. In practice, most transmitters would operate substantially below this limit.

Local Planning Officers and Pressure Groups have stated that they are dissatisfied with this database because of the grid references used, the update processes, the lack of regional visibility, accuracy of the information and the lack of response to enquires raised to Operators through the website. However the public can find locations and information on base stations in their area.

In tests performed as part of this review the website was unable to find a number of urban and non-urban postcodes.

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Recommendations:

Consideration should be given to:

- *Assessing the need for a validation process of the data (currently the Operators submit information and it is entered onto the database by the RadioCommunications Agency).*
- *Developing a feedback process so that when errors are found by users of the database they can be addressed.*
- *Addressing feedback we received that requests for information logged on the web site are not replied to by the Operators.*
- *Applying national grid reference locations to the sites so that local planning officers and other parties can relate the data to standardised GIS data.*
- *Using a nomenclature system for the sites that does not reset every three months when the database is updated (the National Grid Reference could be used for this).*

This database is currently owned and operated by the RadioCommunications Agency.

4.2.4 Commitment 6: Assess all radio base stations for international (ICNIRP) compliance for public exposure, and produce a programme for ICNIRP compliance for all radio base stations as recommended by the independent expert group on mobile phones

All five of the Operators have a programme for ICNIRP compliance and have asserted to Deloitte & Touche in this review that they have checked all their sites for compliance.

These programmes rely on design engineers at design stage certifying that the proposed equipment, at the proposed power ratings, at the proposed frequencies and locality will not exceed ICNIRP emission levels.

At least one of the Operators has decided to undertake spot measurements of EMF levels of their sites and there are a number of interested stakeholders awaiting publication of these results.

There is a large academic body both in the UK and internationally debating the suitable standards for compliance and the associated operational implications. The reader is referred to these studies to draw their own conclusion as to the acceptable standards.

4.2.5 Commitment 8: Provide specific staff resources to respond to complaints and enquiries about radio base stations, within ten working days

All five of the operators have asserted to Deloitte & Touche in this review that responses are given to requests within 10 working days – although they recognise that during the period of the review (especially the first few months) performance in this area required improvement. Where some of the Operators' have conducted their own internal performance monitoring of response rates that indicates that over 95% of response rates are within 10 days.

Anecdotally, community representatives have reported that they now have been able to find nominated personnel to respond to their enquiries although most report that this change came into effect towards the end of 2002 and early 2003.

Recommendation:

Consider the need for the 'specific' requirement in the Ten Commitments as nominated specific staff resources does not appear to be how community representatives liaise with the Operators.

4.2.6 Commitment 9: Begin financially supporting the government's independent scientific research programme on mobile communications health issues

Funders of the Mobile Telecommunications and Health Research Programme receive progress reports and invoices for their funding twice a year.

Statements from the Mobile Telecommunication and Health Research programme show that all five of the Operators paid £23,049.34 in April/May 2002 and £56,212.69 each in October/November 2002.

Other contributors to the research programme include other members of the mobile industry in the UK (including CCI, Cable & Wireless plc, Carphone Warehouse and the Mobile Manufacturers' Forum).

APPENDIX 1

Methodology for review of planning commitments (1, 2, 7 and 10)

This review has covered each of the Ten Commitments. However, due to the agreed focus on the planning elements of the Commitments, a more detailed approach was created to address this section of the review.

The following steps were taken to assess the Operators and their Agents performance in implementing these Planning Commitments (Commitments 1,2,7 & 10):

Step	Activity
1	MOA Kick-Off meetings
2	Individual Operator interviews
3	Sample selected
4	Site Acquisition Agents file reviews and interviews.
5	Local Planning Officer interviews
6	Community Representatives interviews
7	National Pressure Groups interviews
8	Sample analysed

A combination of interviews and site file reviews was used to reach a conclusion on performance.

Step 1 : MOA Kick-Off Meetings

Discussions were held with MTAG (now MOA) to clarify the objectives of the Review, agree senior level contacts within the Operators, availability of existing data, project logistics and reporting.

Step 2: Individual Operator Interviews

Discussions were held with senior level contacts within the Operators regarding the review, expectations, agreeing contacts for interview and their view of progress on network roll-out and the Ten Commitments.

Further, regional managers from each operator attended the meetings. Discussions with the managers focussed on the Operators' processes for the implementation of the Ten Commitments in each of the regions. Further discussions included each regional manager's understanding of the Ten Commitments, implementations of the processes, issues and solutions.

Step 3: Sample Selected

Starting with the population of all sites in the UK, each sample chosen was a subset of the last. This was due to more information being collected as each stage (described below) was completed.

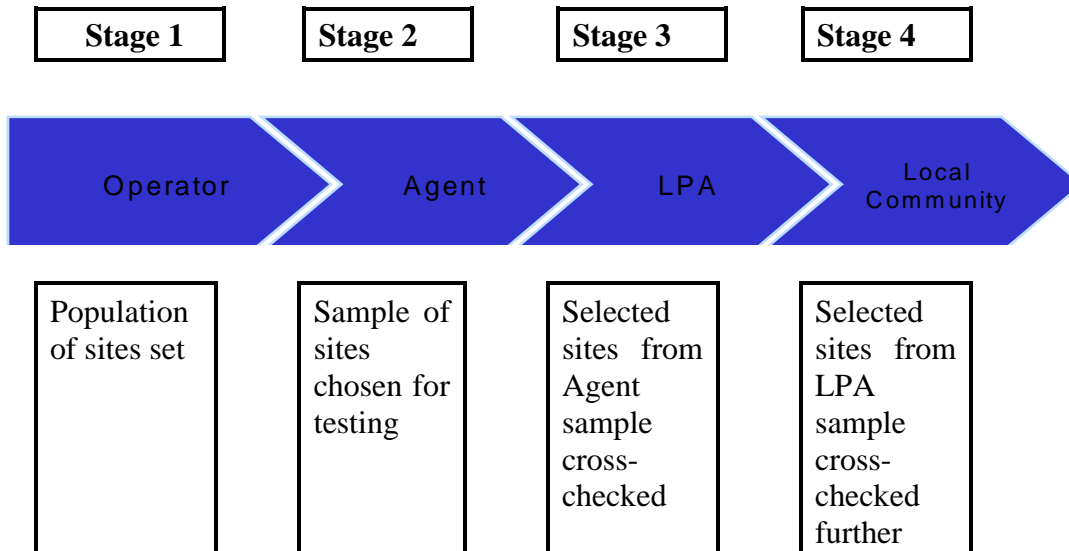


Figure 5: Sample selection process

The population of sites was derived from data provided by each Operator and Agent stating every active mast site. Cross-correlation was performed by comparing the Operators listings to the Agents listings. Sites were selected so as to give a fair representation across the many variables a site possesses. The following variables were covered by the sample:

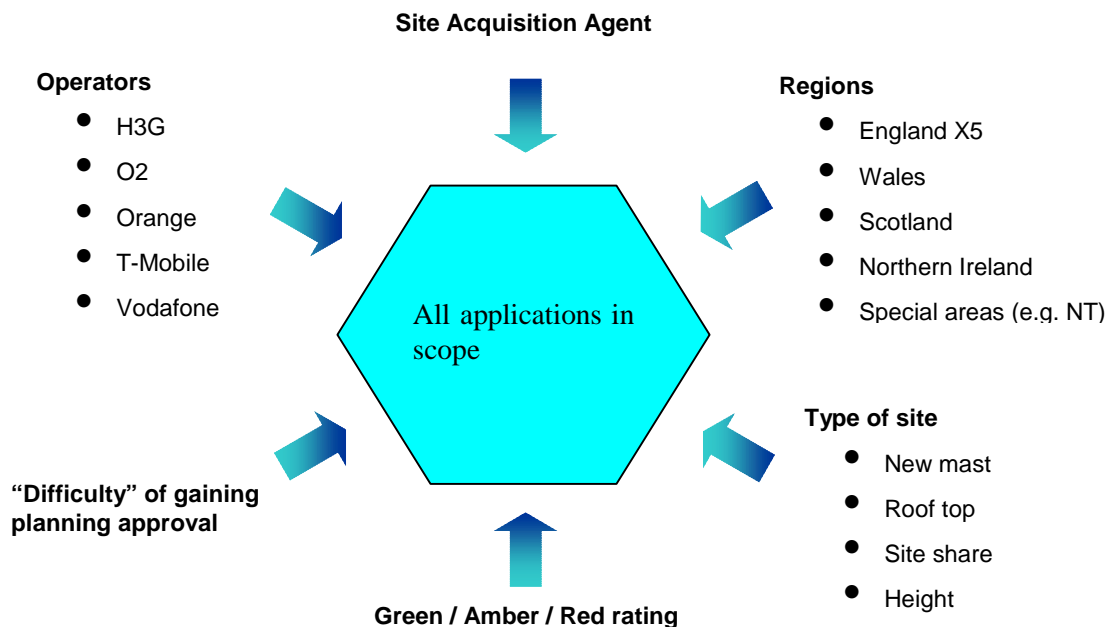


Figure 5: Variables impacting on sample

The date of each mast application was noted for each site, so that performance over time could be assessed.

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A sample size was agreed of 450 sites with the MOA. However, through the course of the review 554 sites were appraised, so that sufficient coverage of the variables could be achieved.

Step 4a : Site Acquisition Agents file reviews

A work programme was used to ensure uniformity and objectivity of testing across the UK. The work programme was based on the Site Selection and Planning Model and the Traffic Light Rating Model (see Appendix 2), therefore covering all aspects of the planning Commitments (1,2,7 &10).

Each of the Agents responsible for the sites in the sample was visited. Using the work programme, each site file was reviewed in relation to the Planning Commitments. For each of the questions on the work programme, it was noted whether the file had:

- Documented evidence of the criteria being performed;
- No evidence of it being performed; or
- The file suggesting that it had been performed but there was no evidence of it on file.

Step 4b : Site Acquisition Agency interviews

At each of the sixteen Agents that were visited for site file reviews, interviews were also set up with key individuals managing, monitoring and performing the site selection and acquisition process.

The interviews discussed the implementations of the Ten Commitments in that branch of the Agent and the perceived impact of the Ten Commitments in terms of benefits and obstacles. In addition, selected site files were discussed and ‘walked-through’ with the Agent, for clarification and explanations.

Step 5 : Local Planning Officer interviews

A sample of Local Planning Officers was selected to be interviewed regarding their experiences surrounding the Ten Commitments. An analysis of press articles, post September 2001, was performed. The results were geographically correlated by Local Planning Authority region. Taking into consideration the press coverage analysis as well as UK wide geographical and operator spread, a sample of sixteen Local Planning Authorities was selected. A Planning Officer from thirteen of these LPAs were interviewed. Sites that were chosen for discussion were selected from the initial Agent sample, and selected by planning sensitivity.

Discussions were held regarding consultation around these specific sites, in addition to the Planning Officers’ overall view of the impact of the Ten Commitments, in terms of benefits and obstacles. The feedback on the specified sites was cross-correlated back to the results from the Agent site file reviews.

Step 6: Local Community Groups

Having discussed specific sites with a sample of Local Planning Officers, a subset of local community representatives was identified. These representatives were identified by their involvement with the sites discussed with the LPA's, and fall into the following groups:

- Ward Councillors;
- Parish Councillors; and
- Representatives of local action groups.

These interviews focussed on verifying facts on the selected sites back to the Agent site file reviews, as well as the representative's view of the impact of the Ten Commitments in terms of benefits and obstacles.

23 representatives were contacted; 10 were available for interview.

Step 7 : National Pressure Groups

Three national pressure groups were approached for interview, with those consenting being interviewed. One refused to comment and be interviewed.

Step 8 : Sample Analysed

Having gathered data from the site file reviews and compared the responses to feedback gathered at each stage of interviews on specific site files, each site work programme was analysed against the reporting criteria.

Performance was reviewed using the Site Selection and Planning Model, and hence dependent on the Traffic Light Rating of each site. This is due to the fact that if a site is graded Amber or Red, more consultation is expected to be performed, as laid out in the Site Selection and Planning Model.

Performance was judged for each criteria on each site, given the expected consultation levels for each site.

An analysis of the performance results is presented in the main report covering the following:

- Overall UK performance
- Performance over the two years covered by the period of the review (3 months to December 2001 and 8 months to August 2002)
- Performance of the Operators in each of the four UK regions (England, Scotland, Wales and Northern Ireland)
- Performance of sites within each of the two differing levels of expected consultation, i.e. sites rated Green on the TLM and sites rated either Amber or Red.

APPENDIX 2

Site Selection and Planning Model, the Traffic Light Rating Model and the Ten Commitments

2.1 Traffic Light Model (TLM)

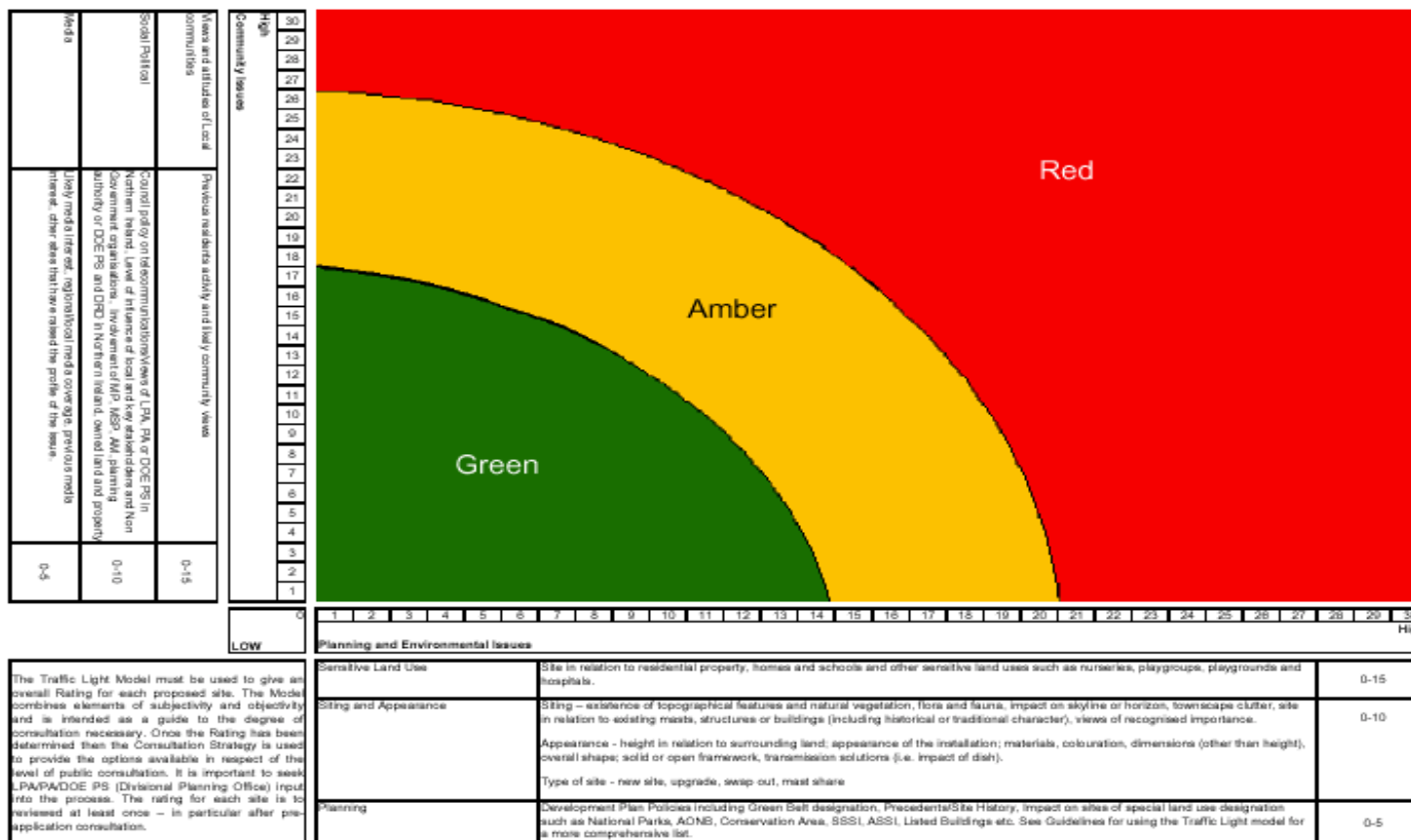
The TLM is designed to assist Operators and their Agents in determining the level of consultation that should be carried out, given the circumstances surrounding the positioning of a mast. The model works on a graph principle, taking onto consideration Planning and Environmental as well as Community issues. Each of these sets of issues are broken down into measurable items, which are then scored using provided checklists. The scores for each set are totalled. Running each of the scores against the relevant axis will result in the sites circumstances being rated as either Green (least sensitive) Amber or Red (most sensitive).

The rating allocated to the potential site is then used to determine the level of consultation in the Site Selection and Planning Model (see 3.2).

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TRAFFIC LIGHT RATING MODEL FOR PUBLIC CONSULTATION



The reader is referred to the MOA website to view the Traffic Light Model

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2.2 Site Selection and Planning Model

The SSPM is the process which was designed by the Operators working in conjunction with other national stakeholders such as Pressure Groups, LGA, Government Agencies, etc, which sets out the consultative stages that an Operator will adopt when developing its network. The aim of this process was to promote transparency and openness with communities in providing clear information as to their intentions for future network development and site specific proposals prior to the submission of a planning application. It consists of a four-stage process, which can be briefly described as follows:

Stage 1 – Area-wide LPA Consultation:

This formalises the process by which an Operator provides information on its annual rollout plans to all Local Planning Authorities enabling engagement with Local Planning Officers as to the proposals and the opportunity to explore site sharing and joint developments between Operators.

Stage 2 - Site Selection and Community Consultation:

Describes the process by which an Operator will identify “options” for sites that will satisfy a coverage requirement in a given area and how these options will be discussed with the Local Planning Authority and a consultation strategy with communities agreed.

To assist this assessment, each option is assessed against a Traffic Light Rating Model (TLM), which enhances the objective analysis and impact of the proposal against planning, environmental and community related criteria. The rating from this assessment will help the operator determine the level of consultation that should be proposed in discussion with the Local Planning Authority. Those sites rated green will be considered to have less amenity impact on communities and will consequently be subject to appropriate levels of consultation. Those sites rated amber and red suggest that a greater level of community involvement in the final decision is to be encouraged by the operator working in conjunction with the Local Planning Authority prior to a formal planning application being submitted.

Stage 3 - Community Consultation:

Describes the implementation of the consultation strategy, which is determined by the Traffic Light Rating Assessment and the subsequent discussions with the Local Planning Authority. The consultation options range from simple notifications to Local Planning Authorities and elected members, through to meetings with community groups and provision of extensive information on site design and site selection.

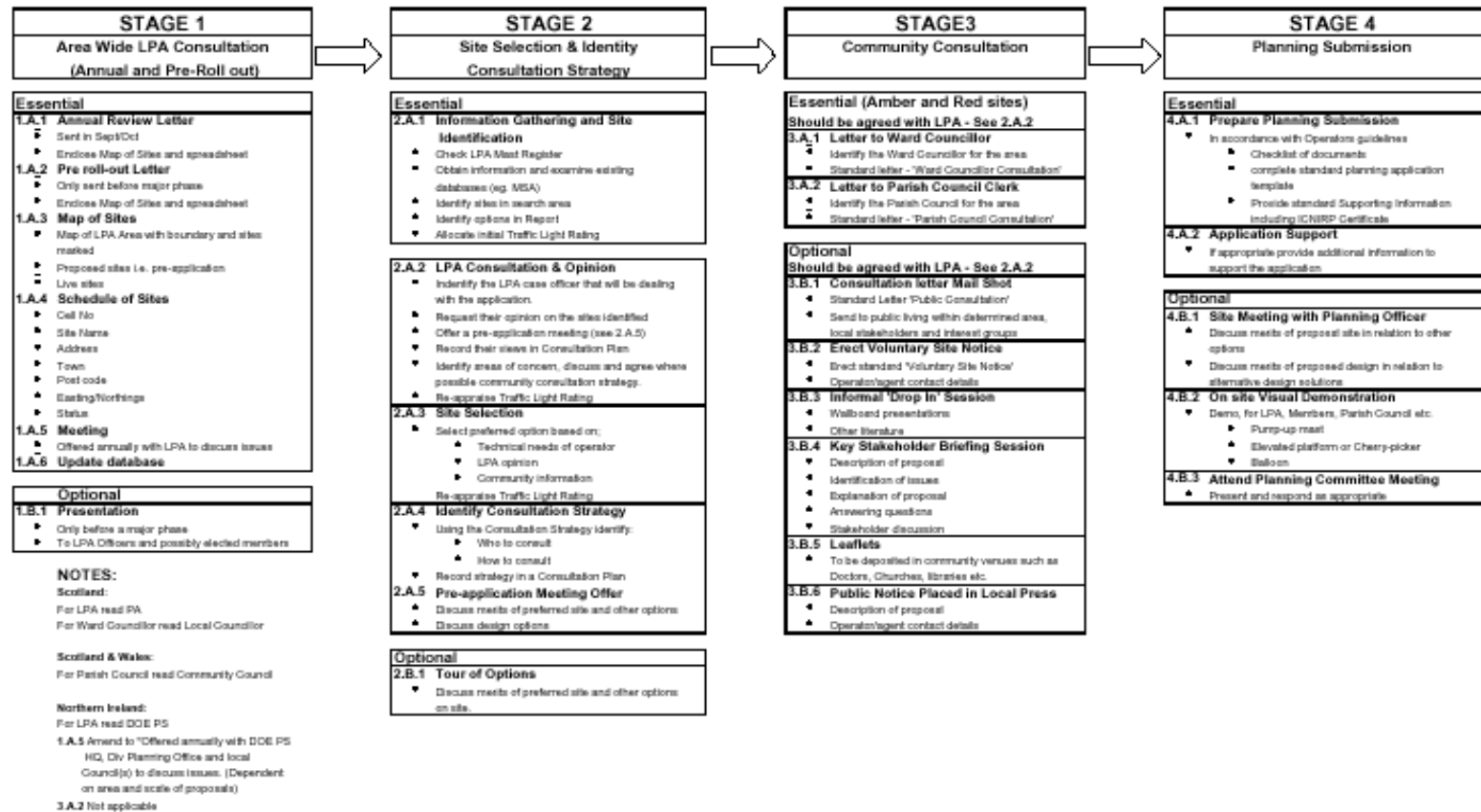
Stage 4 - Planning Submission:

This section details the improved level of information that is submitted with the planning application, which includes alternative sites that have been considered, the consultation strategy that is being discussed with the Local Planning Authority previously and any consultation plan that has been implemented by the operator prior to the submission of the formal planning application.

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SITE SELECTION & PLANNING MODEL



The reader is referred to the MOA website to view the Site Selection and Planning Model

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The Ten Commitments to Best Siting Practice:

1	IMPROVED CONSULTATIONS WITH COMMUNITIES Develop, with other stakeholders, clear standards and procedures to deliver significantly improved consultation with local communities. Reference: Traffic Light Model (Appendix 2) Reference: Site Selection and Planning Model (Appendix 2)
2	DETAILED CONSULTATION WITH PLANNERS Participate in obligatory pre-rollout and pre-application consultation with local planning authorities.
3	SITE SHARING Publish clear, transparent and accountable criteria and cross-industry agreement on site sharing, against which progress will be published regularly.
4	WORKSHOPS FOR COUNCILS Establish professional development workshops on technological developments within telecommunications for local authority officers and elected members.
5	DATABASE OF BASE STATION SITES Deliver, with the Government, a database of information available to the public on radio base stations. Further information can be obtained from www.radio.gov.uk
6	COMPLIANCE WITH ICNIRP PUBLIC EXPOSURE LEVELS GUIDANCE Assess all radio base stations for international (ICNIRP) compliance for public exposure, and produce a programme for ICNIRP compliance for all radio base stations as recommended by the Independent Expert Group on Mobile Phones (IEGMP). Further information can be obtained from www.radio.gov.uk
7	ICNIRP CERTIFICATION Provide, as part of planning applications for radio base stations, a certification of compliance with ICNIRP public exposure guidelines.
8	PROMPT RESPONSES TO ENQUIRIES Provide specific staff resources to respond to complaints and enquiries about radio base stations, within ten working days.
9	SUPPORT RESEARCH INTO HEALTH AND MOBILE PHONES Begin financially supporting the Government's independent scientific research programme on mobile communications health issues.
10	STANDARD DOCUMENTATION FOR PLANNING SUBMISSIONS Develop standard supporting documentation for all planning submissions whether for full planning or prior approval.

Note:

Conformance with the shaded commitments are the primary focus of this review

Figure 2: The Ten Commitments

APPENDIX 3

GLOSSARY OF TERMS

Term	Meaning in this Report
2G	The second generation of mobile phone technology or GSM is the technology currently used in the operation of mobile phones in the UK.
3G	The third generation is the generic item used for the new generation of mobile communications systems. The technology used in the UK is called UMTS. Mobile communications with increased Bandwidth, from 128 Kbps while moving at high speeds to 2 Mbps for fixed stations, will enable multimedia applications and advanced roaming features.
Agent	Company acting on behalf of an Operator to identify potential sites for mobile base stations and/or to prepare and submit planning applications and notifications to the Local Planning Authority. May be known as Site Acquisition Agents or Planning Consultants.
Analogue	First mobile phone technology which was phased out in the UK in 2001 with the introduction of second generation technology.
Antenna	Antenna transmit and receive radio waves in a particular direction and angle. They can be mounted singly or in groups at ground based radio base stations, on roof tops or on buildings and other structures.
Base Station	See Radio Base Station.
Cabin	A structure which protects transmitters and receivers from damage. They can be in the form of large cabins or smaller cabinets.
Cell	A geographic area of coverage that a radio base stations covers.
Code Powers	Certain development powers granted to the mobile phone licence operators under the Telecommunications Act.
Commitments	See Ten Commitments
Dish Antenna	Dish antenna transmit and receive highly focussed radio waves in one direction.
De Minimis	Development that has sufficiently low environmental impact that it is deemed not to require planning permission. Usual interpretation applied to small aerials, dishes and small antenna mounted on buildings.
DTI	Department of Trade and Industry – sponsoring Department for the Telecommunications Industry.

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Term	Meaning in this Report
EiRP	Equivalent isotropic radiated power. This is the power that would have to be emitted in all directions to produce a particular intensity and so takes account of the transmitter power plus the characteristics of the antenna. EiRP is a mathematical concept used by engineers.
Electromagnetic Waves/Fields	Electromagnetic waves are emitted by many natural and man-made sources and play a very important part in our lives. Electromagnetic waves are used to transmit and receive signals from mobiles phones and their base stations. The type of electromagnetic waves mobile phones use is called radio frequency (RF) waves/fields.
Feeder cable	The co-axial cable which connects an antenna to a base station transmitter or receiver.
FEI	Federation of the Electronics Industry, previous name of the MOA.
Frequency	Frequency is the number of times per second at which an electromagnetic wave oscillates. It determines the wave's properties and usage. Frequencies are measured in hertz (Hz). 1 Hz is one oscillation per second, 1 kHz a thousand, 1 MHz is a million and 1GHz is a thousand million. Frequencies between 30 kHz and 300 GHz are widely used for telecommunication, including broadcast radio and television, and comprise the radio frequency band. Mobile telephone systems currently operate at 900MHz and 1800MHz.
Full Planning	<p>Form of planning permission that requires Local Planning Authorities (LPAs) to determine an application within a 56 day period. In deciding whether or not to approve an application for development, the LPA allow a 21 day public consultation period and must consult with certain statutory consultees. Required for masts exceeding 15m in height in England and Wales.</p> <p>Some councils may have delegated authority to case officers (the Planning Officer) to refuse or permit an application, with or without conditions, otherwise the decision will be made by the planning committee made up of elected councillors.</p> <p>All masts which do not meet Licence Notification Conditions are Full Planning in Scotland. In Scotland Full Planning allows 21 days of consultation by the Ward Council.</p> <p>In Northern Ireland all applications are full planning. Applications are processed through the Department of Planning and Environment, which makes recommendations to local councils.</p>

Term	Meaning in this Report
GPDO	See Prior Approval
GSM	GSM - Global System for Mobile Communications or Groupe Speciale Mobile is the international, pan-European operating standard for the current generation of digital cellular mobile communications. It enables mobile phones to be used across national boundaries. GSM systems are operated by O2 and Vodafone at 900 and 1800 MHz, and by T-Mobile and Orange at 1800MHz.
ICNIRP	The International Commission on Non-Ionizing Radiation Protection (ICNIRP) is an independent scientific body which has produced an international set of guidelines for public exposure to radio frequency waves. These guidelines were recommended in the Stewart Report and adopted by the Government, replacing the National Radiological Protection Board (NRPB) guidelines. The mobile network operators have accepted these guidelines and work within them.
Licence Notification	<p>It should be noted that not all permitted development requires prior approval. This can range in some cases from the installation of additional antennas on an existing radio mast, to the development of a whole base station on a building, including equipment cabinets less than 2.5 cubic meters in volume and a set of antennas.</p> <p>Historically, there was a condition requiring the Operator to give the local authority written notice (normally 28 days) before installing any telecommunications apparatus that did not require prior approval or planning permission. This process was known as the 'licence notification'.</p> <p>There is no longer a statutory requirement to carry out 'licence notifications'. However, best practice suggests that Operators should continue to notify the local authority of the installation of mobile phone antennas.</p>
LPA	Local Planning Authority. Local Council or other Body. Responsible for development control and the granting of planning permission within its area.
Macrocell	A macrocell provides the largest area of coverage within a mobile network. The antennas for macrocells can be mounted on ground-based masts, rooftops or other existing structures. They must be positioned at a height that is not obstructed by terrain or buildings. Macrocells provide radio coverage over varying distances depending on the frequency used, the number of calls made and the physical terrain. Macrocell base stations have a typical power output in tens of watts.

Term	Meaning in this Report
Mast	A ground-based structure that supports antennas at a height where they can satisfactorily send and receive radio waves. A typical mast is 15m high, and of steel lattice or tubular steel construction. New slimmer versions of masts are now available which can be painted to blend in with their surroundings, disguised as trees or used in conjunction with street lighting and CCTV cameras.
Mast Share	Mast which holds the antenna of more than one Operator. Typically a taller and bulkier structure than a single operator mast.
Maximum Ground Level Emission	Maximum Ground Level Emission or the beam of greatest intensity usually occurs between 50m and 200m from an antenna. The ground level emission within this area is the highest circling a base station. It is usually many thousands of times lower than international public exposure guidelines. Emission levels reduce rapidly as the distance increases from the antenna. The highest emissions levels are directly in front of the antenna, 15m or more off the ground.
Microcell	Microcells provide additional coverage and capacity where there are high numbers of users within urban and suburban areas. The antennas for microcells are mounted at street level, typically on the external walls of existing structures, lamp-posts and other street furniture. Microcell antennas are usually smaller than macrocell antennas and when mounted on existing structures can often be blended into building features. Microcells provide radio coverage over distances, typically between 100m and 1000m and operate at power levels substantially below those of Macrocells.
MOA	Mobile Operators Association
Mobile Phone Base Station	See Radio Base Station.
NRPB	The National Radiological Protection Board (NRPB) has two main functions: to advance knowledge about the protection of mankind from radiation hazards and to provide information and advice to persons in the UK with responsibilities relating to protection from radiation hazards. The NRPB has produced a set of national guidelines for public exposure to Radio Frequency waves. These have the same scientific foundation as the ICNIRP guidelines.
ODPM	Office of the Deputy Prime Minister
Operators	The 5 UK mobile phone operators – 3, O2, Orange, T-Mobile and Vodafone.

Term	Meaning in this Report
Picocell	A picocell provides more localised coverage than a microcell. These are normally found inside buildings where coverage is poor or where there are a high number of users such as airport terminals, train stations or shopping centres.
Planning Officer	Local Planning Authority Planning Officer in England, Scotland and Wales. Representative of the Department of the Environment and Officers from Regional Departments in Northern Ireland.
Pre-Rollout Consultation	Consultation undertaken prior to the roll out phase of new technology and in advance of the generation of specific development proposals. Stage 1 of the Site Selection and Planning Model.
Prior Approval	Form of development application described under GPDO for England and Wales. A mast under 15m in height has “deemed permission”, but Operators must make a formal application for the prior approval of the LPA to the proposal.. The LPA has 56 days to respond, after which the mast can be built if the LPA has failed to refuse or to determine the application. There is no Prior Approval in Scotland.
Radio Base Station	A radio base station is a macrocell, microcell or picocell site and consists of transmitters and receivers in a cabin or cabinet connected to antennas by feeder cable.
Radiocommunications Agency (RA)	Executive Agency of the DTI, responsible for management of the non-military radio spectrum in the UK.
Roof Top Site	Many radio base stations are located on the roofs of buildings, especially in urban areas.
Second Generation	See 2G
Sectored Antenna	Antenna which transmits or receives higher signal levels in a horizontal direction. The antenna is split into several sectors (typically 3 or 6) to provide 360 degree coverage.
Site Selection and Planning Model	Describes methodology developed by the MOA (formerly FEI), in order to meet the requirements of Commitments 1, 2, 7, 10.
Site Share	Site area accommodating more than one Operator’s base station.
Stub Mast	A roof-mounted mast structure which supports multiple antennas at a height where it can satisfactorily send and receive radio waves. A stub mast is typically 4m - 6m high and of steel lattice construction. Stub masts themselves play no part in the transmission of radio waves.

Term	Meaning in this Report
Ten Commitments	Best siting practice voluntary commitments introduced by the mobile phone Operators to address concerns relating to the development of base stations. Launched in 2001, their aim is to ensure transparency in building mobile phone networks, to provide more information to the public and local planners to boost the community's role in the siting of radio base stations.
Third Generation	See 3G
Traffic Light Model (TLM)	Tool developed by the MOA (formerly FEI) to rate each proposed site. It is intended as a guide to the degree of consultation necessary for a proposed site. The TLM takes into account community, planning and environment issues to allocate scores and a final rating.
TLM Rating	The colour attribute (Green, Amber or Red) allocated to the site option or preferred site when using the TLM. This is a guide to the amount and type of public consultation that is required for any proposed site in addition to that already required for full planning by the authority responsible for planning.
Transmitter	Electronic equipment that generates radio frequency electromagnetic energy and is connected to an antenna via a feeder cable.
UMTS	Universal Mobile Telecommunication System (UMTS) is part of the international vision of a global family of third generation mobile communication systems. The UK refers to this as 3G.
Wavelength	Wavelength is the distance in metres between any two 'similar' points on a radio wave. This portion of the wave is referred to as one complete cycle. The lower the frequency of a wave the longer the wavelength.

APPENDIX 4

TERMS OF REFERENCE FOR DELOITTE & TOUCHE

The following terms of reference for Deloitte & Touche appear on the MOA website.

4.1 Background

The FEI (Federation of the Electronics Industry) represents the five UK mobile phone operators, Hutchison 3G, Orange, O2, T-Mobile and Vodafone - on health and planning related matters.

In September 2001 the operators, under the auspices of the FEI launched the Ten Commitments to Best Siting Practice. The Ten Commitments have three main aims: to address concerns in the community about mobile phone masts, to balance this with the need for further mast development and to provide more support to a planning system not designed or intended to address possible health risks.

An important aspect of development of the operators' Ten Commitments was the need to ensure that all companies were successfully adopting the new procedures. This review of progress is an important part of any implementation process.

In August 2002, the FEI therefore, appointed Deloitte & Touche to conduct a Review of progress by the five UK mobile phone operators on implementation of the Ten Commitments.

4.2 Review of the Implementation of the Ten Commitments

4.2.1 Deloitte & Touche responsibilities

Deloitte & Touche have been engaged to:

- form an independent opinion on whether the operators have made demonstrable progress in implementing the Ten Commitments across the UK.
- provide a summary of progress for all Ten Commitments
- investigate the processes, controls and procedures the companies adopt in the siting of radio base stations, in particular the Acquisition Process – Commitments 1, 2, 7 and 10 (Refer to Annex 1) that deal with the Site Selection and Planning Model, developed to determine pre-application consultation when siting a radio base station, over and above that required under the planning regulations.
- review selected site files across the UK and interview selected Site Acquisition Agents, Local Planning Authorities, local and national community groups. These selections will be made by Deloitte and Touche.

- produce a report for the FEI which will contain findings and any recommendations for improvement.
- develop the minimum standards needed for any future assurance carried out within each operator.

This review is due to be completed by the end of January 2003

Deloitte & Touche are not responsible for reporting on the effectiveness of the objectives of the Ten Commitments or any other aspect of the operators' businesses.

4.2.2 FEI and Operator responsibilities

The FEI and the Operators are together responsible for:

- the design and upkeep of the Ten Commitments, for assessing the adequacy of those Commitments for their purposes and for ensuring that their purposes are communicated to and understood by all stakeholders.

The Operators are individually responsible for:

- determining how they implement the Ten Commitments in their own organisations.
- monitoring and assessing compliance with the Commitments by their own organisations, and by agents that act for them.
- determining and implementing any action plans to achieve or improve upon compliance with the Commitments.

ANNEX 1

The Ten Commitments are:

- develop, with other stakeholders, clear standards and procedures to deliver significantly improved consultation with local communities
- participate in obligatory pre-rollout and pre-application consultation with local planning authorities
- publish clear, transparent and accountable criteria and cross-industry agreement on site sharing, against which progress will be published regularly
- establish professional development workshops on technological developments within telecommunications for local authority officers and elected members
- deliver, with the Government, a database of information available to the public on radio base stations
- assess all radio base stations for international (ICNIRP) compliance for public exposure, and produce a programme for ICNIRP compliance for all radio base stations as recommended by the Independent Expert Group on Mobile Phones
- provide, as part of planning applications for radio base stations, a certification of compliance with ICNIRP public exposure guidelines
- provide specific staff resources to respond to complaints and enquiries about base stations, within ten working days
- begin financially supporting the Government's independent scientific research programme on mobile communications health issues
- develop standard supporting documentation for all planning submissions whether full planning or prior approval