

REGENERATIONER ENVIRONMENT, Attent Ser Ne Chit & al text goes here COMMUNITY SAFETY

TELECOMMUNICATION MAST WORKING GROUP



Chairmans Forward

This report concludes the work of the scrutiny panels Telecommunications Working Group. It was instigated in response to concerns expressed by many of the Boroughs residents about the impact of mobile phone masts, perceived or otherwise, on the health of those living and working near to where they are sited.

It is hoped that the contents of this report will help develop a coherent policy which will enable the citizens of the Borough to exploit the full potential of mobile phone technology, whilst at the same time removing many of the negatives surrounding it.

The scrutiny panel would like to thank everyone who contributed to the scrutiny, and in particular the mobile phone operators for their voluntary attendance at an event held at Bescot Stadium, which was a mutually beneficial event for all able to attend.

Finally, we are grateful to the members of the Scrutiny Panel Working Group, lead officers and the Scrutiny Support Team for their commitment and hard work during this exercise.





Walsall MBC would like to credit the following organisations from whose websites images were obtained, which to our knowledge have not been distorted:

World Health Organisation NRPB (Health Protection Agency) Health and Safety Executive Ofcom (Radiocommunications Agency) Mobile Operators Association T Mobile Vodaphone BT 3 O2 Virgin Mobile Orange And to other internet websites that may have been used.

Lead Members Comments

During consideration of the work programme for 2004-5 issues relating to the publics concerns about perceived health issues, installation of telecommunications equipment on or near school premises, consultation on planning applications and planning policy were identified by members and this work group was set up.

The working group has been gathering evidence since October 2004. Initial investigations clarified what research has been undertaken nationally and what current planning policy guidance is.

Our members gained a greater understanding of the processes, the problems and the perceived health risks associated with telecommunications masts and also what other authorities are doing to address issues.

To find the background and evidence for the report members of the work group have carried out research independently, received information at work group meetings and have held a half day event for mobile phone operators, officers and members who were all invited to participate.

As work group members we have looked into health concerns, planning issues and the concerns of the general public and we feel generally that the more information we revealed the more deeply we wanted to delve. The work of the group could carry on as there are issues still not fully investigated and others that need to be followed up, we feel however that the group has met its remit and that the work group has been useful and productive having produced a good report with clear findings and sound recommendations.

We also recognise that issues relating to telecommunications masts will continue to be a concern nationally and that members of the public need to be informed of its findings in this report.



MEMBERS OF THE TELECOMMUNICATION MASTS WORKING GROUP

The members of the Telecommunication Masts working group consist of selected members from the Regeneration, Environment, Housing and Community Safety Scrutiny and Performance Panel.

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1.0 INTRODUCTION

- 1.1 At a meeting of Regeneration Environment Housing and Community Safety, 22 September 2004, a working group was established to review issues identified relating to telecommunications masts.
- 1.2 The telecommunications working group was established to research:-
 - what other Councils were doing
 - to give the operators opportunity to address the group
 - to consider a policy for planning applications
- 1.3 The membership of the group is:-Councillor Johnson (Lead) Councillor Harrison Councillor Shires Councillor Tweddle

2.0 REMIT OF THE WORKING GROUP

- 2.1 At the first meeting of the group 14 October 2004, it was agreed that the focus of the groups work would be:-
 - To undertake research to identify what action neighbouring councils within the West Midlands were undertaking in respect of telecommunications masts, and to identify any specific examples of best practice nationally.
 - To give the operators opportunity to address the scrutiny panel and inform the working group, in the form of a presentation.
 - To evaluate existing policy and guidelines for planning applications.
- 2.2 In addition to the initial brief, it was agreed that the working group focus' upon how best to identify improvements in the communication of information relating to telecommunications masts, for the benefit of residents of the borough,.

3.0 LEGAL REQUIREMENTS

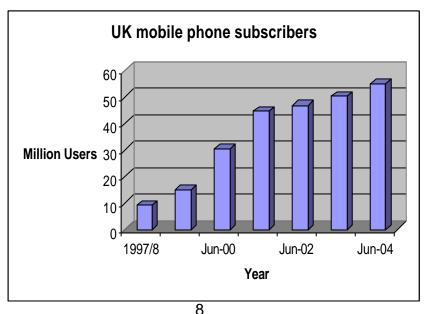
3.1 The main legislative provisions of the Local Government Act 2000 in relation to scrutiny empowers overview and scrutiny panels and their members to review and/or scrutinise decisions made by cabinet and council officers in relation to key decisions, actions carried out within the remit of the council and the performance of the council in relation to targets and policy objectives.

- 3.2 Walsall Council commits to a vision which is unique and special to Walsall because it is based on the views, wishes and needs of local people. It is shared and supported by our partners, our staff and our members and is underpinned by targeted actions to provide a firm foundation for the future for the borough and for the council. The vision:
 - Focuses the efforts of all the employees of the council on the issues that matter to citizens
 - Ensures we put resources firmly behind their priorities
 - Strengthen our joint working with our partners to deliver the overall community strategy for the borough
 - Enables local people and our partners to judge how well we are doing and whether we are achieving our objectives.
- 3.3 The vision priorities are:-
 - 1. Ensure a clean and green borough
 - 2. Make it easier for people to get around
 - 3. Ensure all people are safe and secure
 - 4. Make our schools great
 - 5. Make Walsall a healthy and caring place
 - 6. Encourage everyone to feel proud of Walsall
 - 7. Make it easier to access local services
 - 8. Strengthen the local economy
 - 9. Listen to what local people want
 - 10. Transform Walsall into an excellent local authority
- 3.4 During consideration of the work programme 2004-5, issues relating to the publics concerns about perceived health issues, installation on or near school premises and planning policy guidance (PPG8) were identified by members as issues that impacted on the vision priorities and that should be scrutinised as part of the work programme.
- 3.5 This scrutiny has been carried out in accordance with the rules of procedure arrangements detailed in part 4 of the constitution of Walsall Metropolitan Borough Council (amended September 2003).

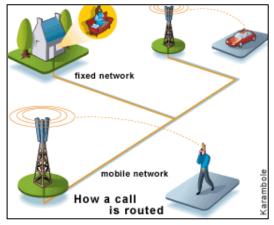


4.0 BACKGROUND

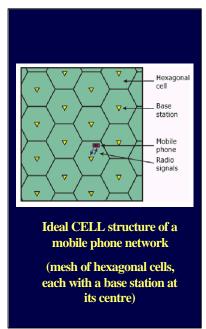
- 4.1 In November 2002, the Government published a new "Code of Best Practice on Mobile Phone Network Development". It provides updated advice for undertaking better consultation and improved proposals for the siting and appearance of masts. This code of practice should provide a strong steer for operators.
- 4.2 Existing planning procedures include:
 - Permitted development rights where by Mobile operators can replace some existing antenna and erect associated equipment without consent subject to certain criteria.
 - Masts below 15m require prior approval which effectively means that they have Permitted Development subject to siting and appearance – decision within 56 days or consent by default.
 - Any new base station installation over 15m requires planning permission
- 4.3 There has been an ongoing debate about the growth of Telecommunications Masts and their safety over the last decade which has resulted in many national and international studies into the effect of the technology on human health.
- 4.4 As of 2004 there are reportedly more than 40 million mobile phones in the UK and over 30,000 base stations. The table below illustrates the rapid increase in the number of subscribers of mobile phones over recent years. This increase is projected to continue with the rapid growth of third generation, or 3G, mobile phone technology.
- 4.5 In 2000, the Stewart Report agreed with previous multinational and national research in finding no demonstrative health problems caused by mobile phones, but advised caution especially among the young, until more research was carried out. A further report in 2004 backed this up.



4.6. A mobile phone sends and receives information (voice messages, fax, computer data, etc.) by radio communication. Radio Frequency (RF) signals are transmitted from the phone to the nearest base station and incoming signals (carrying the speech from the person to whom the phone user is listening) are sent from the base station to the phone at a slightly different frequency.



- 4.7. Base stations link mobile phones to the rest of the mobile and fixed phone network. Once the signal reaches a base station it can be transmitted to the main telephone network, either by telephone cables or by higher frequency radio links between an antenna (e.g. dish) at the base station and another at a terminal connected to the main telephone network. Each base station thus provides radio coverage to a geographical area known as a 'cell'.
- 4.8 Base stations are connected to one another by central switching centres, which track calls and transfer them as the caller moves from one cell to the next. The diagram shows the principle of cell structure of a mobile phone network .

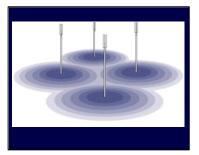






4.9 An ideal network may be envisaged as consisting of a mesh of hexagonal cells, each with a base station at its centre. The cells overlap at the edges to ensure the mobile phone users always remain within range of the base station. Without sufficient base stations in the right locations, mobile phones will therefore not work.

- 4.10 The size of each cell depends on three factors:
 - the local terrain; radio signals are blocked by trees, hills and buildings;
 - the frequency band in which the network operates (in general, the higher the radio frequency, the smaller the cell); and
 - the capacity (i.e. number of calls) needed in any given area. Base stations are typically spaced about 0.2 to 0.5 km in towns and 2 to 5 km apart in the countryside.



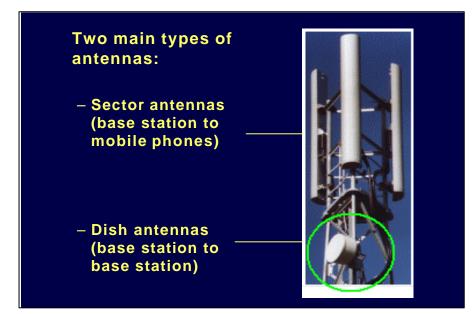
4.11 Cells fall into three categories: macrocells; microcells and picocells, which vary in size and power output.



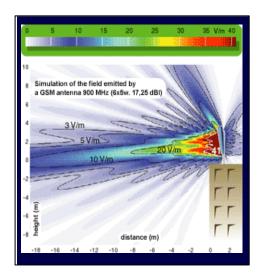
A macrocell provides the main coverage in a mobile network, having a typical power output of tens of watts. The antennas for these are normally mounted on ground-based masts, rooftops and other existing structures, positioned at a height that is not obstructed by surrounding buildings and terrain.

4.12 A picocells provide in-fill signal coverage and additional capacity where there are high numbers of users within macrocells. The antennas for microcells are mounted at street level, typically on the external walls of existing structures, lamp posts and other street furniture. The antennas are smaller than macrocell antennas and can often be disguised as building features. Typically, they provide radio coverage across smaller distances and are placed 300m-1000m apart, having power outputs of the order of a few watts.

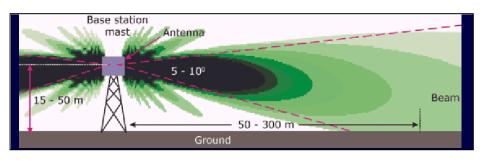
- 4.13 A picocell provides even more localised coverage than a microcell and are normally found inside buildings where coverage is poor, or where there are a high number of users, such as airport terminals, train stations or shopping centres.
- 4.14 There are two main types of base station antennas in use:



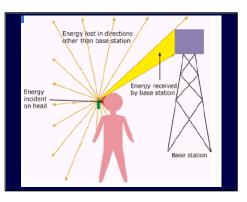
 4.15 Base Station are usually mounted on rooftops or towers. Antennas emit RF beams horizontally (tilted slightly downwards) and not vertically. The power is focussed into a main beam. Typical maximum power output is 5 to 10 W per signal; this is up to 100 W with multiple transmitters.







- 4.16 RF field intensity at ground directly below the antenna is low. RF field intensity increases slightly moving away from the base station and then decreases at greater distances from the antenna.
- 4.17 RF energy is classed as NON –IONISING radiation. RF fields cannot cause ionisation or radioactivity in the body. Exposure to a mobile phone user is higher than to a person living near a base station.



- 4.18 All established health effects of RF exposures are clearly related to heating. No study has shown adverse health effects at exposure levels below international guideline limits. Current scientific evidence indicates that exposure to RF fields, such as those emitted by mobile phones and their base stations, is unlikely to induce or promote cancers.
- 4.19 The Stewart Report noted: "The balance of evidence indicates that there is no general risk to the health of people living near to base stations on the basis that exposures are expected to be small fractions of international guidelines". The report continued: "A precautionary approach to the use of mobile phone technologies be adopted until much more detailed and specifically robust information on health effects becomes available".
- 4.20 In November 2002, the Government published a new "Code of Best Practice on Mobile Phone Network Development". It provides updated advice for undertaking better consultation and improved proposals for the siting and appearance of masts. This code of practice should provide a strong steer for operators.

- 4.21 Mobile Phone Operators agreed to operate on this basis which are known as the ten commitments:
 - 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 LPA's
 - Publish clear transport and accountable criteria and crossindustry agreement on site sharing against which progress will be published regularly.
 - Establish professional development workshops on technical developments for LPA officers and elected members.
 - Deliver with Government, a database of information for the public.
 - Access all radio base stations for ICNIRP compliance for public exposure and produce a programme for ICNIR compliance as recommended by the Stewart Report.
 - Provide a certificate of ICNIRP compliance with all applications in ten days.
 - Provide specific staff resources to respond to complaints and enquiries about radio base stations.
 - Begin financing Government independent research programme on health issues.
 - Develop standard documentation for all planning submissions.
- 4.22 Existing planning procedures are set out in the Town and Country Planning Act and the Town and Country (General Permitted Development) Order 1995 as amended. The guidance to local planning Authorities which gives a framework of advice on how to determine planning application or prior approval applications is set out in planning policy PPG8. In particular the following paragraphs of PPG8 are considered relevant:-

1. The Government's policy is to facilitate the growth of new and existing telecommunications systems whilst keeping the environmental impact to a minimum. The Government also has responsibility for protecting public health.

9. Pre-application discussions should be carried out between operators and local planning authorities on a specific development proposal and should be set in the context of the operator's strategy for telecommunications development in the area.

11. Where a mast is to be installed on or near a school or college it is important that operators discuss the proposed development



with the relevant body of the school or college concerned before submitting an application for planning permission or prior approval to the local planning authority.

13. Where a mast is to be installed on or near a school or college the local planning authority should consult the relevant body of the school or college concerned and should take into account any relevant views expressed.

15. Local planning authorities and operators should work together to find the optimum environmental and network solution on a case-by-case basis.

20. The sharing of masts and sites is strongly encouraged where that represents the optimum environmental solution in a particular case. Authorities will need to consider the cumulative impact upon the environment of additional antennas sharing a mast or masts sharing a site.

29. Health considerations and public concern can in principle be material considerations in determining applications for planning permission and prior approval. Whether such matters are material in a particular case is ultimately a matter for the courts. It is for the decision-maker (usually the local planning authority) to determine what weight to attach to such considerations in any particular case.

30. However, it is the Governments firm view that the planning system is not the place for determining health safeguards. It remains central Governments responsibility to decide what measures are necessary to protect public health. In the Governments view, if a proposed mobile phone base station meets the ICNIRP guidelines for public exposure it should not be necessary for a local planning authority, in processing an application for planning permission or prior approval, to consider further the health aspects and concerns about them.



5.0 EVIDENCE CONSIDERED

- 5.1 The Telecommunication Masts working group has gathered a wide range of evidence from which to make its deliberations. This has included;
 - Oral and written evidence presented by David Elsworthy, Manager, Planning Pollution and Building Control Services and John Grant, Principal Pollution Control Officer
 - Written evidence (leaflets) provided by Department of Health
 - Written evidence from the Stewart Report.
 - Written evidence from the Planning policy guidelines from Bradford City Council, Chichester District Council and Basingstoke & Deane Borough Council.
 - Written evidence from media articles in the local press.
 - Planning Policy Guidance Note 8
 - Oral and Written evidence presented and discussed at a Telecommunications event arranged by Walsall Council at Bescot Stadium with Members, officers and mobile phone operators

6.0 FINDINGS

6.1 Lobby of Local Government

During research and evidence gathering for this review members and officers have viewed many websites including the Local Government Association site and reviews from other authorities in order to gather examples of good practice.

- 6.1.1 It is evident that several likeminded authorities were supporting the Local Government Association which has been organising to lobby the Government for the removal of permitted development rights which allow mobile phone operators to erect telecommunications masts below fifteen metres in height without planning permission. This would require all telecommunications installations to require full planning permission from local planning authorities.
- 6.1.2 Whilst this would increase the number of planning applications received by the Council this would largely be as a direct replacement of the receipt of Prior Approval applications which require the determination within 56 days or the applicant receives consent by default.
- 6.1.3 It is considered that this deadline places a burden on the applicant and the Council and hinders purposeful negotiation between the Council and the telecommunications operator. As a result many Prior Approval Applications may be refused as the Council unable to full engage with all interested parties and when



given time more suitable locations or design solutions may be found as suggested in the 'ten commitments' and PPG8.

- 6.1.4 Members have also found that a report of the All Party Parliamentary Group for Mobiles support this view and feel that the installation of any type of mobile phone mast generates a lot of interest in local communities and that it is only right that Local Authorities are given an appropriate amount of time to consult local people on their views.
- 6.1.5 The LGA are calling for the Government to act on the recommendations announced by the All Party Mobile Group which would allow Local Authorities to consult more fully on applications to erect mobile phone masts of any kind and to help Local Authorities better engage local communities on issues that affect them.
- 6.1.6 Members of the working group are in agreement with the principles of the Local Government Associations lobbying of Government for removal of permitted development rights and recommended to the Regeneration Environment Housing and Community Safety Scrutiny and Performance Panel that Cabinet be requested to agree a letter of support be sent to the LGA indicating that Walsall Council support for their campaign.

6.2 Planning Guidance notes

Following the investigation of other Council's literature and web sites and taking into account current legislation and guidance the working group has designed new planning application guidance notes for prospective applicants. A copy of this is attached at appendix 3. It is considered that this information represents best practice and will encourage better and more complete information at the receipt of a planning or prior approval application rather than experiencing further delay during the course of processing the applications. This will enhance the consultation process giving Members and citizens more information and explanation at the initial stage. It will also help in the speed of processing applications.

6.3 **Design of Telecommunication Equipment**

The working group considered evidence based on the available design of masts and base stations. It was evident that many of these consisted of micro cells which the operators were requiring to infill areas which had no signal or where demand outstripped existing capacity.

The industry are pursuing what they refer to as a street works option that replicates a wider than normal lamp post in appearance of between 10 and 14 metres high with a small cabin close to its base. These are usually located on the highway (footpath or verge) if no existing mast or high building is available. An alternative to these is the use of a dummy alarm box which is fixed to the face of buildings. At present these are permitted development (not requiring the consent of the Council) and whilst effectively doing the same job as the street works option are considerably less visually intrusive.

The working group considers that these are preferable in appearance to the street works option and would comply with both local and national planning policy and guidance.

The working group consider that operators should be encouraged to pursue these where possible.

6.4 Health findings

Research in the United Kingdom into the health effects associated with mobile phones and base stations is primarily undertaken by the National Radiological Protection Board (NRPB), which has recently become part of the Health Protection Agency. Various work is also undertaken by the National Physical Laboratory, OFCOM and academic institutions (universities). Information is also available on behalf of government from the Department of Health.

At an international level, research and health protection information is available from the World Health Organisation and the International Committee on Non-ionising Radiation Protection.

From a technical standpoint it is very difficult for other bodies or institutions to undertake meaningful studies in this field on account of the resources and expertise required. This extends to measurement equipment, regional and national surveys, epidemiological studies and appropriate finance.

6.5 Misuse of Phones

The working group received evidence of the misuse of phones, particularly by youths and children which included bullying and anti social behaviour.

The group acknowledge that this is outside its remit but feel that there is genuine public concern. Operators also raised concern and are looking at ways that they can help reduce such incidents.

Consequently it is recommended that the Regeneration Environment Housing and Community Safety Scrutiny and Performance Panel give consideration to recommending to Cabinet that further scrutiny be agreed to consider misuse of phones particularly by youths and children. Any such scrutiny should include representatives from Education and the Councils anti social behaviour and neighbourhood management disciplines.



6.6 Roll out programme

The working group were advised that each October the mobile phone industry release a roll out programme which identifies where additional coverage needed to ensure good network coverage. Members agreed with mobile phone operators that the roll out programme should be consulted upon with members as they had local knowledge and can advise of the most suitable sites.

Members also considered that members of the development control committee should receive further information from mobile phone operators with regard to their overall roll out strategy.

6.7 Recycling

The working group were advised that there were recycling facilities available for unwanted or discarded hand sets and that mobile phone operators were promoting recycling. The Council supports this initiative and are trying to encourage further recycling in Walsall.

7.0 RECOMMENDATIONS

That the Telecommunications working group recommends that the Regeneration Environment Housing and Community Safety Scrutiny and Performance Panel:

Note the contents of the report and recommend to Council that:-

- Officers of planning and SERCO enter into meaningful discussion with the mobile phone operators relating to the development of information leaflets; and that consideration be given to further research being carried out to investigate the antisocial behaviour and misuse of mobile phones particularly by youth and children; including representatives from Education Walsall and the Councils anti social behaviour and neighbourhood management disciplines.
- ii) the use of the new Councils guidance for telecommunication applicants be adopted in order to require and encourage a greater level of information and justification at the time of the submission of planning applications
- iii) School governors receive information relating to the requirement of operators to consult when making a planning application and be advised of the growing problems of misuse of phones and requested to consider possible preventative actions.
- iv) Officers and the development control committee work with mobile phone operators to develop the working relationship and a greater understanding of the range of equipment available, and particularly in the lead up to and follow up of the roll out plan in October to identify potential sites for the positioning of mobile

phone equipment.

- v) Recycling officers be encouraged to liaise with mobile phone operators to develop Recycling initiatives in Walsall.
- vi) Officers implement the resolution of Cabinet to write to the Local Government Association in support of its campaign to remove permitted development rights from the Town and Country Planning (General Permitted Development)Order 1995 such that all new mobile phone mast base stations or their upgrade require planning permission
- vii) to acknowledge that the Council should follow the advice as set out in planning policy Guidance Note 8: Telecommunications in not pursuing independent research or findings relating to the effect of telecommunication equipment on health as this research is ongoing nationally and internationally and would be out of the reach of the Council to play any meaningful part in this process.



List of Documents and Information considered by the Strategic Review of Disability Working Group (available on request)

Documents

- 1. Extracts from the minutes of the Regeneration, Environment, Housing and Community Safety Scrutiny and Performance Panels relating to Telecommunication Masts Working Group.
- 2. Minutes from the Telecommunication Masts Working Group held on 11 October 2004.
- 3. Minutes from the Telecommunication Masts Working Group held on 1 December 2004.
- 4. Minutes from the Telecommunication Masts Working Group held on 2 February 2005.
- 5. Minutes from the Telecommunication Masts Working Group held on 23 February 2005.
- 6. Minutes from the Telecommunication Masts Event held on 26 April 2005.
- Mobile Operators Association (MOA), "Developing Mobile Networks – Ten Commitments to best siting practice" document.
- 8. Department of Health Leaflet, Mobile Phone Base Stations and Health.
- 9. Department of Health Leaflet, Mobile Phones and Health.
- 10. Various newspaper reports relating to Telecommunication Masts and mobile phones.
- 11. Office of the Deputy Prime Minister, "Code of Best Practice on Mobile Phone Network Development".



Schedule of Scrutiny Panel/Working Group Activity

22 September 2004

Members of the Regeneration, Environment, Housing and Community Safety Scrutiny and Performance Panel (REHCS) received presentation from David Elsworthy and John Grant - Telecommunications Mobile Telephone Base Stations Health Effects and Policy.

11 October 2004

The working group received more in depth information of the key areas discussed at the previous panel meeting on 22 September 2004:-

- Health risks
- Planning Policy Guidelines (PPG8)
- Public fears

Members agreed to prepare a workgroup pro-forma with suggested actions and programme of activity and to research other authorities sites.

2 November 2004

The REHCS panel heard feedback from Councillor Johnson who advised the working group were considering joining other local authorities to lobby Government through the Local Government Association (LGA) to change the policy and remove permitted development rights. It was agreed that research information submitted to the panel be fed back to the working group.

1 December 2004

Members of the working group agreed to feedback a number of recommendations to the scrutiny and performance panel :-

-that officers would produce a draft guidelines document for Mobile Phone Operators;

-draft a letter to the Local Government Association (LGA); -circulate Department of Health leaflets to receptions; -contact Organisational Development to discuss members development opportunities.

15 December 2004

The REHCS Panel agreed the following recommendations:-

 That the Regeneration, Environment, Housing and Community Safety Scrutiny and Performance Panel agree to recommend to Cabinet that a letter of support be sent to the LGA indicating Walsall MBC's support of the lobby for removal of permitted development rights which allow mobile phone operators to erect telecommunication masts below 15 metres in height without planning permission.



- 2) That the Regeneration Environment Housing Community Safety scrutiny and performance panel agree the following recommendations of the Telephone Mast working group:-
 - That Department of Health information leaflets be made available at reception areas, schools and to member group rooms.
 - That panel agrees in principle to an exhibition stand in spring 2005 to raise public awareness and to provide information to the citizens of Walsall about mobile phone and telecommunication masts
 - That the progress of the work group is noted and that further updates be submitted at its next meeting.

19 January 2005

Cabinet agreed the resolution from the last meeting and resolved that a report and presentation should be given to Council by members of the working group.

26 January 2005

Members of the panel were informed of the agreement from Cabinet.

2 February 2005

Members of the working group decided to draft a letter to support the Local Government Association (LGA). The first draft of the guidelines document was submitted, comments were noted and officers were tasked with producing a second draft.

23 February 2005

Members of the working group planned the member development event. Additional guidance notes were agreed in principle.

16 March 2005

The panel members were advised of the revised date of the telecommunications half day event. Panel were informed that working group members had become actively involved in the research and work of the group.

26 April 2005 (1.30-4.30pm)

Telecommunications event (appendix)

26 April 2005 (6.00-8.00pm)

Councillor Johnson gave a brief verbal summary of the afternoon's events and that a number of actions from the meeting would be pursued through the work of the telecommunications work group in particular: -

• The rollout of information relating to mobile phone operators plans for the year.

- The involvement of Local Neighbourhood Partnerships (LNP) in the rollout procedure.
- Investigation of different street furniture such as mini masts and mono poles.
- Mast sharing the operators had indicated they were willing to mast share but it was felt that further encouragement from members would be required for this to happen.
- Schools becoming involved in joint working to consider school bullying videos on phones and the age of children and ability to have phones in schools.

Members reported that the event had been very positive and that the discussion had been open, frank and honest and most mobile phone operators had been represented at the event. He said it was a very informative session and that members, and mobile phone operators had benefited from the event and had learned from each other. He said that members had emphasised the desire to scrutinise the annual telecommunications industries rollout plan which would be available in October which indicates where new masts are needed

