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18th May 2004

Dear Sir/Madam,

Re: Proposed Orange Base Stations in Hartley (Ref: KNT0344)

I write in response to your recent letter regarding the pre-application consultation undertaken for the above telecommunications installations.

I appreciate that you have some concerns about the proposed developments. You may be aware that other residents and local stakeholders have also written to Orange regarding this proposal, and I should like to take this opportunity to respond to all of the points which have been raised.

A wide range of issues have been brought up, therefore I have separated out the subjects for ease of reference and included them on the attached Questions & Answers document. I hope that you find this approach helpful, and that I am able to clarify Orange's position on these matters.

I should like to thank you for taking the time to feed into this pre-application consultation process. I have noted the issues you have raised, and can assure you that the concerns regarding the above mentioned site are taken very seriously by Orange.

All the feedback provided through this consultation will be considered in deciding how best to proceed in meeting our network requirements locally. As you are aware, if Orange do decide to submit a formal planning application further opportunity to comment on the proposal will be available through the official planning process, via the Local Planning Authority.

Yours faithfully,

Questions & Answers: Proposed Orange Base Stations in Hartley (Site Ref: KNT0344)

What damage will be done to the woodland and associated ecosystems in erecting a base station at Gay Dawn Farm?

When installing new base station masts our build teams are given strict instruction to ensure that minimal damage will be incurred to existing wildlife or local features. In many instances we undertake environmental improvement works, such as additional tree planting. We use environmental landscaping advisors to ensure that any such works are carried out in keeping with local environmental characteristics, ensuring, for example, that indigenous plants are introduced to an area.

We are committed to minimising the impact of our activities, including the installation of telecommunications equipment, on the environment. It is our opinion that the proposed installation would not represent a threat to the integrity of the environment or wildlife around the copse at Gay Dawn Farm. We do not expect any trees to be removed in the construction of the site, and we have no reason to believe that the installation of this equipment in Hartley would adversely impact on local wildlife.

How much will the installation at Gay Dawn Farm affect the amenity of this area?

I appreciate the concerns expressed about the possible intrusion this installation might have on the prevailing character of the area. Any new development can alter the amenity of an area to some extent, and when installing telecommunications equipment we try to ensure that such impacts are minimised. This is addressed by only building new base stations where they are needed. By choosing the most appropriate sites, we are able to maximise the signal coverage from one installation, and thereby reduce the need for additional base stations to fill the coverage gaps. We also actively address visual amenity issues and try to blend our installations as much as possible with surrounding landscapes, and as mentioned above, we often undertake environmental or security improvement works at base station sites.

In this instance, our network radio engineer has identified the need for two base stations in Hartley. The 20m tower at Gay Dawn Farm will improve signal coverage across most of the target cell area. However, due to the mature trees to the south of the proposed site, an additional smaller installation would be required in Hartley, as the signal would be impeded by the trees. We have tried to determine alternative solutions to the network requirements in Hartley, but unfortunately have been unsuccessful in identifying a single installation solution, due mainly to the topography and vegetation cover in the area. However, by seeking to minimise the visual impact of both base stations, we hope that the existing amenity value of the area will not be affected.

Why does the installation at Gay Dawn Farm have to protrude above the tree line?

The proposed base station at Gay Dawn Farm would be located behind existing deciduous tree cover, which will provide natural screening of most of the installation. However, whilst the natural screening offered by the tree cover is of great advantage visually, vegetation will significantly reduce the radio frequency signal. For this reason it is necessary to ensure that the antennas are situated above the tree line, and hence the entire installation could not be screened in this way.

It is necessary for us to ensure that the location is such that the optimal level of signal coverage can be achieved, which normally necessitates a more prominent position for the structure. Accepting a poorer signal quality might mean that we would require additional installations elsewhere in the area, to ensure that the network coverage was robust enough to meet the demands placed upon it. Therefore, by design, a certain amount of visual intrusion is not always avoidable. We have worked with nearby vegetation in our design for this proposal, to attempt to minimise the contrast of the structure with the surrounding landscape. However, in order for the installation to work efficiently, it is necessary for the uppermost part of the structure to be visible.

What steps have been taken to minimise the visual impact of these developments?

Visual amenity is one of the key issues we address when developing any proposal, and in fact is a fundamental consideration of the Local Planning Authority in deciding on the appropriateness of a development. Whilst we always try to ensure that our installations will blend as easily as possible with surrounding environmental characteristics, we cannot entirely conceal or camouflage every base station. We have strived for designs in Hartley that are as discrete as technically feasible.

Although it is important to us to ensure a robust network service in this area, we strive to achieve this without detriment to the area or to the community in which we wish to locate our equipment. Our telecommunications installations are designed and located to be as sympathetic to the surrounding environment as possible, and we have led the industry in developing innovative and discrete designs for our installations.

In trying to ensure that a new structure will blend in with the surrounding environment, we consider designs that are in keeping with existing local characteristics, wherever this is possible. We try to ensure that surrounding vegetation or other existing features will help to conceal the shape of the installation. We also seek to design the installation so that the colouring and pattern are sympathetic to the environmental background at the site.

At Gay Dawn Farm we are proposing a 20m high lattice tower installation located behind existing deciduous tree cover, which will provide some natural screening of most of the installation, and which should help to minimise the contrast between the structure and the surrounding environment. On the land adjacent to the Black Lion Pub we are proposing a discrete mock lamppost design, which should appear unobtrusive due to the fact that it is a commonly found item of street furniture. However, in response to the feedback we have received through this consultation, we could alternatively consider a mock telegraph post installation, which may be more in-keeping with local characteristics.

Are you proposing to place a mock pine tree in woodland that doesn't contain this type of tree?

We actively pursue designs for our sites which minimise the contrast between the structure and its surroundings, and we have led the industry in using innovative, discrete designs for our installations. In fact, Orange was the first operator to use the mock pine tree design in the UK. Unfortunately, at present, no viable alternative design options are available that would blend in entirely with a deciduous woodland. Due to the shapes and seasonal behaviour of deciduous trees, convincing designs have not yet been possible to produce.

The current proposal for Gay Dawn Farm is not to install a mock pine tree base station, but rather a lattice tower, partly as a result of concerns previously expressed that the mock tree would appear out of place in predominantly deciduous woodland.

Is it safe to live near a base station?

In any publicly accessible area, emissions from an Orange base station will not exceed either the NRPB (National Radiological Protection Board) standards or the more stringent International Commission on Non Ionising Radiation Protection (ICNIRP) reference levels, and this is understood to represent safe operating standards.

Orange's primary concern is the health and safety of the public, our customers, and our employees. This is fundamental to the way that we operate. We take advice from leading UK and international authorities, such as the World Health Organisation (WHO), on matters of health and safety, to ensure that we are operating as safely as possible according to expert advice. The WHO is monitoring all of the research in this field internationally. They state that despite extensive research, there is no evidence to date which concludes that exposure to low level electromagnetic fields is harmful to human health, and they advise that,

"International guidelines have been developed to protect everyone in the population: mobile phone users, those who work near or live around base stations, as well as people who do not use mobile phones."

The international ICN1RP guidelines have been recommended for adoption across Europe, as part of a precautionary approach implemented to address uncertainties whilst research into possible health effects continues, and all UK base stations comply with ICN1RP requirements.

There is no reason to believe that living or working in the vicinity of a base station represents any threat to health.

If the equipment is safe, why have some councils and schools decided not to permit base stations on their property?

There are times when local decision makers will seek to apply specific local powers, on top of prevailing national guidelines, in response to public concerns. The Planning Minister has previously advised against locally inconsistent approaches, as English Planning Policy Guidance is developed based upon stringent investigation, and incorporates a standardised precautionary approach.

With regard to locally implemented policies prohibiting base station installations, the UK's Independent Expert Group on Mobile Phones (IEGMP) fully considered the issue of such 'buffer zones', based on comprehensive expert review and assessment, and reached the conclusion that no benefit was to be gained from adopting such an approach.

Furthermore, the WHO advises that:

"If regulatory authorities have adopted health-based guidelines but, because of public concerns, would like to introduce additional precautionary measures to reduce exposure to RF fields, they should not undermine the science base of the guidelines by incorporating arbitrary additional safety factors into the exposure limits".

Doesn't the Stewart Report say that base stations should not be located near schools or residential areas?

The IEGMP, who produced the Stewart Report following their review of the existing evidence base, did not recommend siting base stations away from residential areas or sites such as schools, as it was considered that such an approach could not be justified in terms of the scientific evidence base.

The IEGMP decided that there were no scientific grounds for setting guidelines below the ICN1RP exposure levels, and no outstanding benefits in locating telecommunications installations away from populated areas or sites such as schools and hospitals. The group did not, therefore, recommend a minimum distance between telecommunications installations and schools or residential properties, nor did they recommend that the main beam emitted from a base station should avoid falling on school grounds.

Orange designs its installations to operate strictly within all relevant health and safety guidelines. In any area accessible by the public, radio wave emissions from an Orange telecommunications installation will not exceed these international guidelines.

In fact, as part of a precautionary approach the IEGMP recommended that ongoing independent, random monitoring of UK telecommunications installations should take place, in order to confirm that all UK mobile network operators are adhering to the ICN1RP health-based exposure guidelines. A national audit of mobile phone base stations is therefore taking place, having begun in 2001.

As a result of public concerns, this survey has mainly focused on installations on-site or close to schools and hospitals, and is carried out by the Radiocommunications Agency. You can access all the survey results on the Office of Communications (OfCom) website, at: http://www.ofcom.org.uk/consumer_guides/mob_phone_base_stat/?a=87101

To date, 259 schools and 31 hospitals have been surveyed. The highest recording in the latest complete audit study was measured at Brixham Community College in Devon, with a reading of 0.00162 Watts/m² or approximately 1/619 of the ICNIRP guideline reference level for public exposure.

In other words, the highest reading taken in the vicinity of a base station, during the latest round of random surveys of sensitive sites, is more than 600 times lower than the precautionary health-based guidelines. Working within these levels no substantiated evidence exists indicating that mobile telecommunication installations pose any threat to health.

How can we know what the long term effects on our health will be?

The proposed installation is designed to operate within the specified ICNIRP power levels for public exposure, and continual monitoring ensures that this is the case. The ICNIRP standards have been specifically developed to take account of constant, ongoing exposure to RF emissions, even for sensitive members of society such as children and the elderly, living close to a base station. In addition, the ICNIRP guidelines incorporate a large safety margin, on top of the precautionary reference baseline.

Several recent epidemiological studies of mobile phone users have found no convincing evidence of adverse health effects, even among people who began using the very first mobile phones. However ongoing research is vital and the mobile industry is supporting an independent research fund to further investigate this issue. In the meantime a precautionary approach has been adopted to further safeguard the health of the public, mobile phone users, and employees. Complying with the ICNIRP reference levels forms part of the recommended precautionary approach put forward by the IEGMP..

Hasn't research shown that children are more vulnerable to health effects from base station emissions?

The Stewart Report does conclude that if, through ongoing research, adverse health effects should ever be found to be associated with the use of mobile phone handsets, children may be likely to be more sensitive to exposure due to their greater radio frequency (RF) absorption potential and longer lifetime exposure periods. Therefore, as part of the recommended precautionary approach, the expert group suggests that children should be discouraged from making non-essential mobile phone calls.

However, the exposure scenarios from mobile phone handsets and base stations are very different. The radio frequency levels to which the public are exposed are extremely small from base station emissions and significantly higher for an individual using a mobile phone handset during a call, although remaining within ICNIRP safe operating levels. Hence the precautionary approach identified for each scenario is quite different. As mentioned above, the IEGMP does not consider that any additional protection of children's health would be achieved by siting base stations away from schools or homes.

Global research has been specifically carried out into the sensitivity of vulnerable groups, such as children and the elderly, towards exposure to the RF emissions from base stations. The research indicates that no section of the population is so sensitive to the emissions from this type of equipment that additional protection is required, above that which is provided by the precautionary health-based guidelines already in place, the ICNIRP reference levels.

No substantiated evidence exists to date linking exposure to RF emissions from mobile phone technology with adverse human health effects, despite significant global investment into this type

of research. The conclusion reached by the IEGMP, that the balance of evidence does not indicate a threat to human health from base station emissions, maintains its position as the basis of current Government policy.

Do you think it is acceptable to locate a base station so close to residential properties, a school and an elderly persons' care home?

It's not always possible to site base stations away from populated areas due to the low operating power and the higher RF levels, which means that the signal doesn't travel very far. Therefore, if people want to be able to use their mobile phones while at home or work, in other words, indoors, we have to site our installations close enough to support the network demands.

The Minister for Public Health specifically raised the issue of locating telecommunications installations within residential areas, as a result of public concerns, and this was a key issue for the IEGMP to look into.

The group reviewed and analysed a vast body of substantiated and *unsubstantiated* evidence before publishing their findings in a report, commonly referred to as the Stewart Report. The group found no convincing reason to site base stations away from populated areas. The main conclusion of the Stewart Report was that:

"The balance of evidence to date suggests that exposures to RF radiation below national guidelines do not cause adverse health effects to the general population."

Similar conclusions have been reached by expert review groups around the world, including The World Health Organisation (WHO), The French Expert Group, The Royal Society of Canada Expert Group, and the Health Council of the Netherlands.

In fact, the latest summary review of the research into possible health effects associated with this technology, undertaken by the UK Government's Advisory Group on Non Ionising Radiation, confirmed that there remains no conclusive evidence that mobile phones or base stations cause harm to human health. The review report, published in January 2004, announced that:

"Exposure levels from living near to mobile phone base stations are extremely low, and the overall evidence indicates that they are unlikely to pose a risk to health."

Until it can be proven beyond doubt that base stations are safe, shouldn't they be located well away from peoples'homes?

Placing a ban on all new telecommunications developments in the vicinity of residential areas, whilst research continues, might seem to represent an ideal solution for those concerned about potential health effects. However, this would not enable the mobile phone operators to continue to meet the needs of the 50 million mobile phone users in the UK today.

The Government places great value on the technological and business advantages afforded through the provision of robust mobile telecommunications services in the UK, and a moratorium on all new telecommunications installations would seriously threaten the ability to deliver mobile services to meet existing and future customer demands. Government policy on mobile technology has been shaped by the recommendations and findings of the Stewart Report, and as previously mentioned, there is no evidence to indicate that exposure to the emissions from mobile technology represents a threat to human health.

Can you guarantee the safety of this installation?

Whilst I am able to confirm that Orange's sites are designed to operate within recognised safety levels and to required regulatory standards, within which no evidence of harm has been found linked to base station emissions, I will not be able to provide a guarantee of absolute safety, regardless of the amount of research undertaken. No industry or activity would categorically offer such an assurance.

Orange comply with all legislation and guidelines that are applicable and all Orange sites fully meet the ICNIRP precautionary guidelines. Orange has a legal duty under the Health and Safety at Work Act 1974 and the Management of the Health and Safety at Work Regulations 1992 to ensure the health, safety and welfare of employees and the general public, and our sites are designed to ensure strict compliance with all health and safety standards and guidelines.

Are pace makers affected by the emissions from base stations?

In terms of interference with medical devices such as pacemakers or hearing aids, whilst people are advised to switch off mobile phones in hospitals because in principle the radio waves emitted could interfere with equipment, this is a precautionary measure, and is not applied to telecommunications base stations as the electromagnetic fields are not strong enough to cause interference effects. In fact, many hospitals have base stations located on-site.

While pacemakers can be affected by high electric fields, in areas accessible to the general public around a base station the fields are too small to do this.

Do you ever think about the indirect health effects you might cause when installing equipment in communities?

I realise that anxiety or stress can sometimes be linked to the introduction of a new development, such as a telecommunications installation, especially where concerns relate to potential visual impacts or health effects, and that such anxiety could indirectly affect one's health or quality of life. One of the aims of undertaking improved community consultation at the pre-application stage is to ensure that people are made aware of our plans at an early stage and to present the facts about mobile phone technology to attempt to allay anxieties.

Have you adopted a precautionary approach, following Government guidance?

Orange has fully implemented a precautionary approach in the operation of its network, following the IEGMP recommendation. The precautionary approach adopted involves such actions as improved site-sharing procedures, increased levels of stakeholder engagement, and redesigned networks to accommodate the ICNIRP requirements.

The European Commission issued guidance in February 2000 which emphasised that a precautionary approach should respond to an identified problem, rather than being applied in an attempt to achieve zero risk. The precautionary approach adopted in this country has been in response to the gaps in knowledge, as identified by the expert group, and is intended to remain in place whilst these gaps are addressed.

The European Commission has also publicly stressed that measures implemented as part of a precautionary approach should be based on as careful a review of the relevant scientific literature as possible. In other words, the approach should have a factual foundation, rather than incorporating arbitrary controls which might undermine the science base. The approach adopted in the UK is based upon the recommendations arising from the IEGMP's Stewart Report, based upon the expert group's wide-ranging review of relevant research. It is therefore considered to be a valid way forward, and is clearly set out in the Government's Code of Best Practice on Mobile Phone Network Development (available from the Office of the Deputy Prime Minister).

Despite ongoing research in this field, no evidence to date has indicated any reason to alter the current precautionary approach. The adoption of a precautionary approach does not mean siting all base stations away from residential areas or sites such as schools.

There are strict rules governing base station siting in Europe - should we be following their lead?

As mentioned previously. Orange observes international WHO guidance on the siting and operation of equipment, and by complying with ICNIRP reference levels, follows the standard European approach to the precautionary development of mobile phone networks,

How will this installation affect the value of my home?

We are very conscious of the environmental impact of our sites and when designing an installation and selecting a location we endeavour to ensure that it will have the minimum possible impact on surrounding property. We are confident that the installations proposed will not appear obtrusive in the surrounding landscape, and do not foresee any reason for the value of local homes to be reduced as a result of this structure.

Homes across the UK are situated near a variety of utility installations, such as telegraph poles and electricity sub-stations, with no effect on their value or ability to sell. Properties are valued according to a variety of market conditions, and cannot be attributed to one individual element. We are confident that the siting of a transmitter of this design near to a property would not materially affect its value.

It is also worth considering that in 2004 it is likely that there will be more mobile phones than fixed lines in the world, and with more than 50 million mobile phone users in the UK alone, mobile phones are part of our everyday life. For many people, it is important to be able to use their mobile phones whilst at home, and robust signal coverage may become increasingly important as an element in the decision making process for new home buyers. Many people are actually replacing fixed line services in their homes altogether with mobile telecommunications, and for such users adequate signal coverage in a property will be a necessary feature.

What would the construction timetable be?

It is not possible at this stage to provide an indication of a potential timetable for construction activity, as it has not yet even been determined whether planning applications will be submitted for this proposal. However, should this proposal proceed, Orange could supply construction timelines for both sites, indicating which activities would be undertaken at which date. All of our construction staff are clearly instructed to carry out their work with minimum disruption to local residents, and every effort would be made to ensure that this was the case in Hartley.

How much maintenance activity will be carried out on the base station at Gay Dawn Farm?

Several on-site inspection visits would be anticipated each year, with occasional maintenance work. This means that maintenance staff would not normally be expected to visit the site too frequently, and hopefully this would reduce possible inconvenience to residents.

By improving the access road to the site at Gay Dawn Farm, won't you encourage nuisance visitors to the area, by providing easier access to adjoining fields?

I understand that, in light of current and previous experiences in the area, there are concerns about the potential for anti-social behaviour increasing due to the installation of the base station at Gay Dawn Farm, and the associated access track being used more regularly. Unfortunately I am unable to provide assurances that the installation will not attract any nuisance visitors and anti-social activity. There is no way of preventing access to the track without removing the right of way for all community members.

Can you guarantee that this equipment will not generate any nuisance problems, such as noise or smells?

We would not expect any nuisance or disturbance issues to be created by the base station. However, if the proposed installations do proceed, and you feel that nuisance problems are being generated by the operating equipment. Orange will fully address any complaints.

Can health concerns be taken into account by local planning authorities considering base station applications?

Government guidance on the precautionary approach states that if the proposed mobile phone base station complies with 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."

(Paragraph 98, Planning Policy Guidance Note 8).

However, health considerations and public concern about possible health effects could, in principle, be deemed material considerations. Government guidance on the matter is that the Local Planning Authority must determine what weight to attach to these considerations in any particular case. Previous planning outcomes do not necessarily guide judgement on future planning applications.

Why do you continue to submit planning proposals - shouldn't there be a limit to the number of applications you are allowed to make?

We have measured significant network deficiencies in this part of Kent. Without installing equipment in the cell search area, the problems will get worse, as increasing demands on the network further stretch the struggling current network provision. We will continue to seek appropriate network solutions, and where options seem acceptable, will consider submitting planning applications, until a successful local solution is reached. The network weaknesses will not improve without the installation of new equipment, and this can only be achieved by submitting a planning application in pursuance of an appropriate proposal. It is for this reason that ongoing proposals are considered.

How does this proposal differ from previous applications?

The current proposal incorporates amendments based upon feedback received from the Local Planning Authority during previous applications. Previous proposals have featured the installation of a mock Scots Pine tree at Gay Dawn Farm, and a 25m high lattice tower installation. We hope that the current proposal is more acceptable to the local community and planning authority as a result of an improved understanding of local expectations.

Once you have erected one base station, what's to stop you adding to it at a later date?

Any significant changes to the installation would require additional planning notification to be submitted to the local planning authority. Orange would not be able to carry out major upgrade work without going through the planning process, and any concerns about increasing the facility could be addressed at that stage.

If one development is permitted on the land at Gay Dawn Farm, an area of Local Landscape Importance, wouldn't this open the door for other developers to encroach upon the land?

The challenge surrounding the need to balance the protection of the countryside with technological progress is actively addressed by the mobile phone industry, and recently the Outstanding Landscapes Planning Accord was signed by the Mobile Operators Association, the Association of National Park Authorities (ANPA), and the Association for Areas of Outstanding Natural Beauty as part of the commitment to ensure that our natural landscapes are protected as far as possible while at the same time developing the nation's modern communications infrastructures.

Chief Executive of the ANPA, Martin Fitton has said:

"People living in and visiting National Parks naturally want the same quality of communication services as the rest of the country."

Orange extends the same consideration to smaller areas of local landscape significance, and in proposing the suggested installation, utilising existing foliage to help to screen the equipment, we aim to provide modern communications services with as little impact on the surrounding landscape as can be achieved.

The Government places great importance on the provision of competitive and robust mobile communications systems throughout the UK, and providing signal coverage to these special areas is considered important by mobile operators and the Government alike. However, this does not mean that if Orange were to install equipment upon such land that all new developments would henceforth become acceptable there. Any new development would be subject to approval by the Local Planning Authority, who would judge each case on its own merits.

How can you consider installing a mast in a Green Belt area, in contradiction of planning policies on the matter?

Orange is not able to proceed in the development of an installation such as those proposed, without engaging the English legal planning system. It is for the decision makers, usually the Local Planning Authority, to pass judgement on the suitability of any development application in the jurisdiction, weighing up the potential impacts on the environment and the benefits to the community as a whole, as well as assessing the extent to which an application complies with relevant local policies and national planning guidance.

It is our opinion that the proposed installation would not contradict guidance set out in planning policy frameworks on the matter. However, it would be for the Local Planning Authority to pass judgement on this issue.

Isn't the woodland site leased to local residents as a public amenity, as part of the planning permission conditions for the housing estate?

Orange is not aware of any restrictions currently in place which would prevent consideration of a base station proposal at Gay Dawn Farm.

Why did the potential site provider at The Country Club withdraw from negotiations with you?

Discussions between Orange and site providers previously contacted regarding the lease of their land for base station development remain commercially confident, and I cannot publicly disclose the nature of discussions in this respect. Unfortunately it is not always possible to pursue sites which might appear appropriate, where the site provider would be unable or unwilling to accommodate telecommunications equipment.

Who will benefit from these network improvements?

Concerns have been expressed that the installation of telecommunications equipment in Hartley will adversely impact on the local economy, by deterring people from living in the area. I understand that you might have concerns about local impacts such as these, but by working with local stakeholders in the pre-application stage for this site, we hope to be able to determine the best way forward, aiming to balance as far as possible our network requirements with community expectations.

It is not our intention to detrimentally affect the local community, economy or environment, but rather to find a way to provide a valuable modern telecommunications network for everyone in the area to access. By providing as much information as possible on the proposal and the issues surrounding mobile telecommunications technology, at this early stage, we hope to try to allay some of the concerns that exist.

Without adequate Orange signal coverage in the area, people will find it increasingly difficult to access the range of Orange services, experiencing more dropped calls, holes in the network, and 'network busy' inconvenience. This is an area of active network usage for Orange, yet the infrastructure is inadequate to support the customer expectations locally, hence the requirement for this installation. This would also seem to imply that the proposed installation will bring benefits to a large number of people living in, working in, or visiting this neighbourhood.

Sales of mobile phones are starting to level off, so why do you need more base stations?

For many people mobile phones have become an integral part of daily life, and provide an opportunity to connect to friends, family or business at all times. Although many calls to and from mobile phones may not be vital, mobile phone users enjoy the freedom and flexibility mobile communication opportunities provide.

However, for some people, mobile phones represent far more than an entertainment or social accessory. A great number of people own mobile phones as security measures, to provide a valuable emergency communications service. Numerous examples of mobile phones playing vital roles in rescue operations, for all manner of emergencies, have been highlighted in the media over recent years. The timing and location of such communications needs can not be predicted, which is why it is valuable to ensure that access to mobile services is available everywhere and at all times. In addition, many businesses are dependent on their mobile phone services, and for some small businesses, mobile telecommunications are their primary contact route. It is important to these types of mobile phone customers that adequate signal coverage is completely reliable, in order to accommodate unexpected communication needs.

With the majority of people in the UK now owning mobile phones, it is true that first time buying of handsets may level off. However, demand for mobile services is not waning. Increasing numbers of mobile phone customers use mobile rather than fixed line communications, which places capacity demands on the networks. Furthermore, as Third Generation (3G) technology grows in popularity, so the capacity requirements will further increase, due to the additional data transmission needs associated with this type of technology. In areas where the signal is weak, 3G services will not be accessible.

Why do you need base stations here?

I appreciate that it might seem difficult to accept the need for a new site if you are able to use your own Orange handset without obvious problems. Whilst the service provided for Orange customers in this area might seem adequate most of the time, there are a number of reasons why we consider it necessary to improve on the current situation by installing these telecommunications sites.

Orange currently has a strong customer base in this area, and the ever-increasing demand for mobile telephone services, as discussed above, places enormous capacity requirements on the Orange network. This can only be addressed by installing more base stations. If this isn't addressed in the short term. Orange customers will experience increasing service **access** problems over time. Our intention is to address deficiencies before the level of inconvenience becomes unacceptable.

Each base station can handle a limited number of simultaneous calls. Hence, if too many calls are made at any one time, the base station will be unable to cope with the demand. The increased demands on the data handling capacity of the network created by use of 3G technology further limits the service potential of the base station.

It is costly and time consuming for us to build new sites, and I can assure you that we will only do this where it has been identified as the most suitable way forward. The need for this site has been determined based on factors such as the number of calls currently being dropped due to capacity exceedances; call traffic monitoring; and measured signal weaknesses or 'holes' in the network. We have undertaken extensive investigations throughout this specified cell search area. but unfortunately the number of available and technically feasible siting options is extremely limited.

You have another mast 2km away. How many base stations do you need in an area?

The number of installations in an area is dependent on many factors, including the topography of the area, the density of buildings and trees, the number of people living in the area and the growing demand for mobile services. In areas where the signal is less robust, as a result of a combination of these factors, a greater concentration of telecommunications installations will be required.

We have measured a number of deficiencies in the signal strength in and around Hartley, and our monitoring statistics have flagged up service problems, such as the number of calls regularly being dropped due to 'holes' in the network. In order for Orange customers to enjoy uninterrupted mobile service in this area, network solutions must be found.

If there were sufficient commercial incentive, would you consider site sharing with your competitors?

The Government has issued clear guidance both to operators and local planning authorities, including the following, taken from Planning Policy Guidance 8:

"In order to limit visual intrusion the Government attaches considerable importance to keeping the numbers of radio and telecommunications masts, and of the sites for such installations, to the minimum consistent with the efficient operation of the network. The sharing of masts and sites is strongly encouraged where that represents the optimum environmental solution in a particular case."

Our preference is always to use existing structures, whether it is a building or an existing radio mast, before building a new site. This makes sense environmentally and economically. What's more, should an application be submitted to the Local Planning Authority, they would expect to see evidence that site sharing had been considered in the first instance.

Currently, over 60% of Orange sites are on shared structures. Unfortunately, in this instance, having checked local authority and operator databases for existing telecommunications structures within the cell search area, and following extensive field-based surveys seeking to identify potential structures upon which our equipment might be sited, we have been unable to identify any suitable structures which might provide a location for this equipment, within the cell search area.

Are you planning on allowing other companies to share your mast in the future?

The proposed installation at Gay Dawn Farm may be able to support some additional operating equipment, while the installation proposed adjacent to the Black Lion Pub would not be capable of mast sharing. Any operator proposing to install equipment on the tower at Gay Dawn Farm would undertake pre-application consultation, and would be required to observe formal planning processes in the submission of an application. It would be for the Local Planning Authority to decide whether or not such site sharing would be appropriate.

What consultation activity have you undertaken?

Pre-application consultation has been carried out in strict accordance with the industry-agreed guidelines. The Ten Commitments, as outlined in the Government's Code of Best Practice on Mobile Phone Network Development. Local stakeholders have been directly contacted, and site notices erected in the vicinity of the proposed sites, to alert people to the fact that we are considering network development activity in Hartley, and to provide advice on the consultation process. I do apologise for any difficulties experienced in viewing the site notice. We always try to secure the site notices prominently and in places likely to be encountered by passers-by, yet close enough to the proposed site to clarify the location details. By using a variety of consultation techniques we hope to reach as many interested parties as possible.

Our intention in contacting local stakeholders, such as the Parish Council, regarding our plans for Hartley, was to provide information regarding our identified network needs in this area, and to seek local opinion on the proposal to develop an installation at Gay Dawn Farm and by the Black Lion Pub, which we have determined as a suitable overall solution to meeting our network deficiencies in this area.

This is the first part of the consultation process. Following this pre-application consultation, we shall review the feedback received, and take a decision regarding how to proceed. Should we

decide to pursue these options, you will have further opportunity to comment on the proposals, through the formal planning process, managed by the Local Planning Authority.

I can assure you that the purpose of this pre-application consultation has been to try to identify a way forward which best matches the needs of local people, the planning department, and Orange's service provision. Whilst we recognise that consensus is not always going to be achievable through this process, this does not make our intention less sincere.

What is Government guidance on consultation with schools?

The Government's Code of Best Practice on Mobile Phone Network Development recommends that schools or colleges located in close proximity to proposed base stations should be notified of the operator's plans, and offered the opportunity of commenting on the proposal.

Will you withdraw your proposal as a result of adverse publicity for Orange?

Obviously it is not in our interest to receive bad publicity, and I can assure you that it is not our intention to cause anger and upset among the communities within which we site our equipment.

I understand that some local stakeholders are not supportive of a proposal within this neighbourhood. However, there are others who may wish to see the network services improved locally. Through this pre-application consultation we are seeking clarification on the key local issues, and it is always our aim to locate our equipment as sensitively as possible, in-keeping with local expectations.

Whilst we might not withdraw a proposal as a result of local opposition, we will obviously listen to concerns and try to find a solution that is acceptable to all stakeholders: local community members, the planning authority, and Orange customers. It is not always possible to find a network solution which perfectly suits everyone's expectations, however we do try to balance these issues as carefully as we can.

Are you trying to wear down residents with your continuing consultation activity and proposals?

I realise that it must be frustrating and time consuming to continue to respond to ongoing pre-application consultation exercises for similar proposals. I am grateful for the time you have invested in participating in these consultations processes, and can assure you that all feedback is seriously addressed.

The intention in writing to local stakeholders, and in running pre-application consultation for every proposal we consider, is to ensure that all those likely to have an interest in the proposal are made aware of our possible plans, of our local needs, and of the possibility that a planning application may be made for a base station in your neighbourhood. We would not wish to proceed without providing local people with an opportunity to contribute to the decision making process, and therefore, as we continue to seek a suitable proposal in this area to meet our network demands, so we will continue to seek your views. I apologise for any inconvenience that this might cause, but hope that you can understand Orange's reason for ongoing consultation activity.

Are there any alternative sites to the ones proposed?

We have spent considerable time and effort investigating potential sites within the cell search area and the network solution proposed represents, in our opinion, the best available balance of community, planning, and technical needs.

The sites have been selected as the result of extensive field-based surveys and database reviews undertaken by Orange's acquisition consultants and network radio engineers. Having determined the target cell area, within which a base station would be capable of meeting our technical requirements, we have proceeded to identify potential site options. The suitability of a site is based on the extent to which it balances a range of different factors, and we therefore seek sites which will:

- be acceptable, in terms of town and country planning, to the local planning authority, who act on behalf of the local community;
- blend as easily as possible into the surrounding landscape, minimising the potential visual impact of the structure;
- meet the expectations of the local community, as far as possible, in terms of service provision, location, and aesthetics;
- have reasonable access for maintenance, with the potential to install an electricity supply.

The current site proposals appear to represent as close a balance of these factors as we have been able to achieve, within the cell search area. It is regrettable that some sites, which might appear to provide an ideal location for telecommunications equipment, cannot always be pursued due, for example, to lack of availability or an inability to reach agreement with potential site providers. I appreciate that you feel there may be other sites that might offer more appropriate locations for this telecommunications installation. However, having spent considerable time and effort investigating potential sites within the cell search area, and trying to identify a single site solution located outside the residential area of Hartley, the available site options have been found to be extremely limited.

Will the base station affect television or radio reception?

All electrical devices produce Electro-Magnetic Fields (EMFs). This is an unavoidable side effect of electricity, created when electrical current flows along a wire. In fact, radio transmitters make use of this effect in order to produce radio waves.

Devices such as televisions and radios are designed to receive and interpret certain EMFs, allowing you to see and hear specific broadcast programs. If these devices receive a wrong signal or one that they cannot understand, they will not function properly. This is what we mean by interference.

Interference of devices with the operation of others is highly regulated by the government, through the Radiocommunications Agency. All licensed users of the radio spectrum have allocated bandwidths, which theoretically minimises the likelihood of interference. Furthermore, most modern electrical devices are screened against interference from radio waves at the levels experienced in the vicinity of telecommunications installations. The emissions from base stations are generally not sufficient to interfere with the operation of electrical equipment nearby, or the interpretation of other radio wave signals.