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**Dear Sir**

**Proposed reforms to permitted development rights to support deployment of 5G**

The Institute of Historic Building Conservation is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

We are very pleased to have the chance to comment on the consultation document. The Institute's comments are as follows:

We have concerns over the addition of further cabinets adding to streetscene clutter and being placed in intrusive and unsuitable positions near to historic buildings without suitable considerations of their impact. We believe that the requirement to minimise the visual impact is not working well in practice with existing cabinet sitings.

There needs to be greater onus placed on Cabinet providers to make the investigations concerning where designated heritage assets are located and for them to have Heritage Impact Assessments, undertaken by suitably qualified conservation professionals, to mitigate harm.

Consideration could be given to providing clearer guidance for the companies to follow about what minimising visual impact means. This would include ensuring careful consideration on siting, on using the most appropriate proportions for the site, on suitable design and using appropriate colours to minimise the impact of cabinets in sensitive locations such as in conservation areas or near the setting of Listed Buildings. There should be particular requirements for cabinets not to be located in close proximity to Listed Buildings.

The Local Planning Authority should have the ability to ensure that siting is suitable and for cabinets to be removed if not. Phone companies often assert that final positions are vital for operational reasons and cabinets then remain in place. Technical concerns should not always override all other considerations. There is no potential check on the installation company in terms of their assertions concerning network requirements. Perhaps this could be considered. A formal priority should be given to appropriate siting in sensitive areas. The cost of undoing a poor decision is very high and can cause long term damage even if the cabinet is moved.

We suggest that 2.5 cubic metres is too large to be minimised in certain locations.

Advertising stickers and logos are potentially unsightly but are difficult to restrict.

Yours sincerely

Fiona Newton  
IHBC Operations Director