Title: Increasing permitted development rights thresholds for mobile infrastructure **IA No:** 3518(1) **RPC Reference No:** RPC-3518(1)-CLG **Lead department or agency:** Department for Communities and Local Government and Department for Culture Media and Sport **Other departments or agencies: DEFRA**	Impact Assessment (IA) **Date:** 7/10/2016 **Stage:** Final **Source of intervention:** Domestic **Type of measure: Secondary Legislation** **Contact for enquiries:** paulg.martin@communities.gsi.gov.uk

Summary: Intervention and Options

RPC Opinion: GREEN

Cost of Preferred (or more likely) Option				
Total Net Present Value	**Business Net Present Value**	**Net cost to business per year** (EANCB on 2009 prices)	**In scope of One-In, Two-Out?**	**Business Impact Target Status**
£96.2m	£96.2m	£10.8m	Yes	Qualifying provision

What is the problem under consideration? Why is government intervention necessary?

Improving the country's communications infrastructure is integral to our ability to grow the economy and compete on a global scale. Demand for mobile broadband services is rising, and new 4G services are now being rolled out. Access to mobile services still varies significantly across the country, with particularly poor provision in some rural areas. Planning delays can hold back and increase the cost of deploying mobile infrastructure. Government intervention is therefore needed to ensure that planning controls are proportionate and operate in a way that facilitates swift deployment of mobile networks.

What are the policy objectives and the intended effects?

This intervention seeks to support improved mobile coverage, reduce the burdens on business and boost growth by removing the requirement to seek planning permission. This will help boost growth by providing access to superfast, reliable voice and data connections (4G) by incentivising mobile telecommunications operators to invest in infrastructure to deliver improved mobile connectivity (including the Governments' mobile targets). It will also benefit individuals through better mobile telecommunications access for phone and data uses, and reduce the need for local planning authority assessments of development, enabling them to concentrate on larger developments of more strategic benefit to their area.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

Do Nothing: This option involves no change to the existing permitted development rights which apply to the deployment of mobile infrastructure.

Option 1. Preferred Option: This involves a number of changes to planning regulations to enlarge the scope of permitted development of mobile networks, and increase size thresholds for infrastructure to reduce existing limitations on installation.

Will the policy be reviewed? It will be reviewed. **If applicable, set review date: 10.2021**				
Does implementation go beyond minimum EU requirements?		N/A		
Are any of these organisations in scope? If Micros not exempted set out reason in Evidence Base.	**Micro** Yes	**Small** Yes	**Medium** Yes	**Large** Yes
What is the CO_2 equivalent change in greenhouse gas emissions? (Million tonnes CO_2 equivalent)		**Traded:**	**Non-traded:**	

I have read the Impact Assessment and I am satisfied that (a) it represents a fair and reasonable view of the expected costs, benefits and impact of the policy, and (b) that the benefits justify the costs.

Signed by the responsible Minister Gavin Barwell Date: 21st September 2016

Summary: Analysis & Evidence

Policy Option 1

Description:

FULL ECONOMIC ASSESSMENT

Price Base Year 2015	PV Base Year 2016	Time Period Years	Net Benefit (Present Value (PV)) (£m)		
			Low: 41.1	**High:** 177.2	**Best Estimate:** 96.2

COSTS (£m)	Total Transition (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	Optional		Optional	**Optional**
High	Optional		Optional	**Optional**
Best Estimate				

Description and scale of key monetised costs by 'main affected groups'

None. We do not consider there to be additional familiarisation costs as a result of this proposal, consistent with previous Impact Assessments relating to permitted development rights (e.g. RPC14-FT-CLG-2147(2))

Other key non-monetised costs by 'main affected groups'

Potential impacts on amenity from increased deployment and environmental costs from additional infrastructure. However, uncertainty around their significance means impacts are not monetised (see Costs and Benefits section).

BENEFITS (£m)	Total Transition (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	1.6		4.6	**41.1**
High	2.4	2	20.3	**177.2**
Best Estimate	2.0		10.9	**96.2**

Description and scale of key monetised benefits by 'main affected groups'

Reduced costs of seeking planning approval for mobile telecommunications infrastructure, including 4G (average annual benefit £2.1m)
Reduced cost of emergency works as a result of a longer duration of permitted development (average annual benefit £9.0m)

Other key non-monetised benefits by 'main affected groups'

Reduced uncertainty for business and potential increased coverage leading to better connectivity also leading to higher revenue for 4G operators and additional capacity and connectivity. However, uncertainty around its significance means impact is not monetised (see Costs and Benefits section). Potential increase in speed of roll out of 4G voice and data and 5G in future.

Key assumptions/sensitivities/risks — **Discount rate (%)** 3.5

Savings from no longer submitting planning or prior approval applications for mobile telecommunications are between £2,000 and £4,330 per proposal.

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m:
Costs: 0	**Benefits:** 10.8	**Net:** 10.8	-54.0

Evidence Base (for summary sheets)

Problem under consideration

The deployment of superfast mobile broadband is not as rapid as it might otherwise be, in part, because of the existence of the need in many cases to seek approval from the local planning authority prior to installing equipment for mobile telephony. This can delay, and add cost to, to the deployment of superfast mobile broadband. It is considered that this could be reducing the social and economic benefits that are emerging from the adoption of 4G mobile technology, and could potentially reduce the benefits of 5G technology in the future for the same reasons.

Context

The Secretary of State (DCLG) has powers to grant planning permission, by development order in England, for specified development e.g. telecommunications, new state funded schools, change of use of buildings etc. These national planning permissions are, known as permitted development rights (PDRs) and are therefore deregulatory. Part 16, of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO) relates to PDRs for licenced telecommunications providers.

In England, the deployment of mobile infrastructure (e.g. antenna and ground-based masts for mobile phones), requires either a planning application to the local planning authority, or mobile operators may use PDRs. These provide in prescribed circumstances automatic planning consent for the installation of electronic communications infrastructure subject to limited conditions. For example, in some instances the PDRs require the prior approval of the local planning authority who must reach its decision within 56 days. Historically, land in protected areas has significantly less PDRs i.e. Areas of Outstanding Natural Beauty, Conservation Areas, World Heritage Sites, National Parks, and the Broads (areas that are set out in Article 2(3) land (protected areas) of the 2015 Order) and Sites of Special Scientific Interest.

The coalition Government previously implemented planning relaxations in 2013 to aid the deployment of mobile telecommunications through increased PDRs. A Regulatory Triage Assessment based on those proposals was assessed in RPC12-FT-CLG-1656 and Green flagged by the RPC.

In December 2014, the Government made a legally binding agreement with mobile operators to secure £5 billion of industry investment to tackle partial not spots (areas with mobile coverage but not all four providers) in the UK to ensure 90% geographical coverage for voice and SMS coverage by 31st December 2017. The Government's Manifesto commitment is to hold mobile operators to their binding agreement. The 2014 agreement required Government to undertake a review of the planning regime for mobile infrastructure in England. This lead to the publication of the mobile Call for Evidence on 10 July 2015, a joint DCLG and DCMS review published alongside the Government's Productivity Plan. The Call for Evidence sought views on the effectiveness of the planning system in England; the changes made in 2013 and sought options to inform change. The review closed 21 August.

There were 40 responses received to the consultation from mobile operators, wholesale infrastructure providers, local planning authorities including national parks, stakeholders representing rural and environmental interests, and individuals. In addition, network operators provided supplementary information, which has been incorporated into this assessment and used to build estimated cost savings to business of the resultant proposals.

The Government's Rural Productivity Plan (20th August), reiterated the importance placed on high quality and widely available mobile communications to improve coverage.

Responses to the Call for Evidence consultation confirmed there is strong support for mobile connectivity, with all respondents clearly understanding the economic benefits it brings. Operators advised whilst 90% of planning applications were approved in the last 3 years a decision can take up to 11 weeks instead of the statutory 8 weeks. This is leading to delays and uncertainty in the deployment of infrastructure. Operators also advised the information required to support prior approval applications costs between £2,000 and £2,500. This is similar to the cost of a planning application because, industry tell us, unlike prior approvals for most other types of development, the level of information required by local authorities for telecommunications masts is similar to what would need to be provided for a planning application.

The Secretary of State (Culture Media and Sport) has legislative powers to grant network providers special rights to assist with the installation of their networks. To make use of the permitted development rights a mobile network operator must secure Ofcom's agreement to become a Code Operator. The Electronic Communications Code (Conditions and Restrictions) Regulations 2003 also sets out restrictions and conditions including imposing a duty on Code Operators to co-operate and consult (28 days) with planning authorities and highway authorities on the deployment of mobile infrastructure and to produce and follow guidelines on how they should conduct the installation of their infrastructure.

Rationale for intervention

The Government has a Manifesto commitment to hold mobile network operators to their legally binding agreement to provide 90% coverage for the UK landmass for both voice and text by end of December 2017. Part of the agreement is a Government commitment to review the planning system in England for deploying mobile infrastructure.

To deliver the Government's commitment, we published a call for evidence (DCLG and DCMS) on 10 July 2015 seeking views on how the planning system in England can best support mobile connectivity. The call for evidence also sought views on the effectiveness of the mobile planning changes made in 2013. These proposals follow on from the feedback received during the call for evidence.

Policy objective

The policy objective is to support increased mobile coverage by reducing the planning requirements on mobile operators through the greater use of PDRs alongside DCMS's legal framework to support the rollout of both voice and data (4G) and, in future, 5G technology.

The aim is to support mobile operators by providing certainty that deployment of as much infrastructure as possible falls under PDRs. This will be achieved, by extending permitted development rights, changing thresholds, removing the need for prior approval in certain circumstances and granting new rights in both non-protected and protected land areas to support and enable mobile access to rural communities**.**

Description of options considered

Do nothing: choosing not to amend legislation would involve no changes to the existing restrictions on mobile deployment.

Alternatives to regulation: none, Government believes efficient and effective communications infrastructure is integral to increased, and sustainable economic growth. Amending legislation to speed up deployment of mobile infrastructure will reduce operators' deployment costs, increase the number of viable sites and should lead to increased network coverage and capacity.

The Government's preferred approach: the policy option is to implement deregulatory changes (set out in section 3) by amending Part 16 of the General Permitted Development Order (secondary legislation). This will also require complimentary changes to Department for Culture Media and Sports Electronic Communications Code (Conditions and Restrictions) Regulations 2003.

Option 1: New and amended permitted development rights to:

Allow new ground-based masts with prior approval:

- Up to 25m high in non-protected areas (from current 15m height limit); and
- Up to 20m on protected land (currently planning permission is required).

Allow existing ground-based masts to be extended:

- Up to 20m without prior approval (currently prior approval applies) and between 20m and 25m with prior approval (currently any height above 20m requires planning permission) in non-protected areas; and
- Up to 20m where the mast is on a street with prior approval that considers highways lines of sight and pedestrian access (no change).
- Up to 20m without prior approval in protected areas (currently planning permission is required); and
- Remove prior approval requirement for upgrading infrastructure (currently prior approval needed).

For infrastructure on existing buildings and structures:
- Remove the existing 6m prior approval threshold for individual antenna in non-protected areas; and
- Remove the limits for commercial structures and a prior approval limit linked to height with no restrictions on structures over 30m in height in protected areas (currently planning permission required).

For small cell antenna (currently, 2 antenna allowed with prior approval but not within 20m of a highway):
- Remove the prior approval and the highway restriction in both non-protected areas and protected areas;
- Remove the existing limitations on numbers of such antenna systems on buildings and structures;
- Strengthen the sector owned code of practice for siting and design.

Emergency works: non-protected and protected areas
- Increase from the current 6 months time limit to 18 months for emergency works to support operators where a new site is required, and to enable negotiation of a wayleave agreement.

Costs and benefits of the preferred option

The costs and benefits of the preferred option will impact on the main affected groups in the following way:

For Mobile Network Operators:

Where full planning permission is no longer required for some developments and is replaced with permitted development rights

Having to obtain planning permission adds uncertainty for the industry and can lead to delays compared to obtaining prior approval or a full PDR. This uncertainty could lead to lower investment where commercial returns are marginal e.g. in rural and protected areas. Businesses which operate the mobile networks will benefit from reduced administration costs and time savings leading to quicker deployment of infrastructure.

Where prior approvals for infrastructure will no longer be required (e.g. small cell antenna, antenna on buildings and structures and extending existing masts)

Although prior approval is beneficial compared to obtaining planning consent, it does take up to 56 days for a decision to be made, and adds transaction costs to the roll out of mobile broadband infrastructure. Prior approval is not considered necessary in many cases e.g. for upgrading or extending existing infrastructure as the principle of development is established and has been accepted by the locality. Operators advise removing prior approval will reduce their administration costs for preparing applications for permitted development prior approval by between £2,000 to £2,500 per approval.

For Local Authorities and other public bodies

Local planning authorities may benefit from a reduced administrative burden where the application would have come forward by planning application, but this will be offset by a reduction in fee income per application. Local planning authorities may experience a rise in the numbers of environmental complaints due to impacts on amenity, but this indirect impact has not been monetised.

For any proposed increases to mast heights the regulations require code operators to notify local authorities, who have access to safeguarding maps. This allows any concerns about safeguarding zones to be raised and addressed. However under the permitted development rights safeguarding authorities cannot enforce any such requirements and concern has been raised that this might result in some masts being extended without fully addressing the concerns raised by safeguarding authorities.

However, no evidence has been provided to support this, and the Government has worked with the industry to ensure that their code of best practice for code operators sets out clear procedures for ensuring that safeguarding authorities are made aware of and engaged in any developments that do not require prior approval.

Assessment of Costs and Benefits

The proposals will mean a reduction in the documentation a business will need to provide. Whilst it is difficult to estimate the cumulative savings to firms by streamlining the processes, there are clearly time and administrative cost savings from both the shift from a planning application to prior approval and from prior approval to full PDRs.

We do not consider there to be additional familiarisation costs as a result of these proposals. The revised regulations have been prepared in close consultation with the four Mobile Network Operators (the Code Operators) to whom the regulations apply, meaning that they already fully understand the proposed changes.

(1) Removing the requirement for prior approval

Although the prior approval process yields significant benefits to business compared to preparing and submitting a full planning application, for example offering increased certainty that developments will be able to proceed, there are still administration and potential delay costs.

- Prior approval can take up to 8 weeks to decide. Applicants incur an application fee and any accounting/time costs associated with preparing an application. The Mobile Operators Association (MOA), which represents UK operators, advised in their response to the Call for Evidence that the documentation and time input required for prior approval is between £2,000 and £2,500 per application i.e. similar to that needed for a planning application. We take the midpoint of this range, £2,250 per application, as our central estimate.
- Applicants are exposed to risk; if the local planning authority determines that an application does not fall into the prior approval process, it can require the applicant to submit a planning application, thereby imposing a second application fee and any further preparation costs.

Extending masts

- Using figures provided by the MOA in their response to the Call for Evidence and subsequent consultations with them, we can estimate that there are around 600 planning applications each year for masts between 15m and 20m in height. This is based on the share of current mobile telecommunications infrastructure development they represent, around 20%, of the 9,074 applications submitted in the last three years. Of these, 10% might be extensions to existing towers (based on the coverage each type of development would provide). The MOA confirm that “in the absence of conclusive and detailed information, we feel that this estimate lies within a reasonable range”. This implies a saving to applicants of approximately £0.1m per year on the cost of submitting c. 60 Prior Approval applications.

4G Infrastructure on buildings and structures and small cell antennae

- We also estimate, based on the information provided by the MOA, that around 13,000 new antenna on buildings and structures, and small cell antenna will be installed between April 2016 and December 2017 in order to provide 4G coverage. This is based on MOA figures on the proportion of current mobile telecommunications infrastructure development that they represent (43% and 10% respectively) and the number of new base sites required to deliver 4G (around 25,000).
- We would expect operators to begin installing 4G infrastructure prior to the introduction of this proposal, as they do not consider planning to be a significant barrier to activity. We therefore reduce

the estimated 13,000 figure proportionately to account for the 6 months of activity (April to October 2016) out of 21 months (April 2016 to December 2017) which will take place prior to the implementation of this measure. This reduces the number of relevant applications from 13,000 to c. 10,000 (i.e. 13,000 x (21 – 6) / 21).

- We estimate that only around 20% of these applications would currently require a planning application. This is based on proportion of planning applications received to number of new 4G base sites installed per year, using figures provided by the MOA. This implies that c. 2,000 (20% of 10,000) 4G installations would require a planning application in the counterfactual.
- It is unclear how many developments on buildings and structures, or of small antenna, would not require prior approval under the proposed changes. Establishing this would require detailed scrutiny of historic applications, as this information is not currently collated by MOA, DCLG or DCMS. However, we would expect this proportion to be significant as operators are likely to factor in the reduced restrictions, where possible, when planning new infrastructure. We therefore make the illustrative assumption that 50% of the applications identified would no longer require prior approval under the proposed changes. The MOA confirm this is a "reasonable estimation" and that no additional evidence is available. A sensitivity analysis is presented in the annex to this document, using alternative assumptions of 40% and 60%.
- These assumptions imply that up to c. 900 4G installations (50% of c. 2,000, given rounding) could benefit as a result of the measure, with a one-off saving to applicants of approximately £2.0m (a reduction of 900 applications, saving £2,250 per application).

On-going infrastructure on buildings and structures and small cell antennae

- On an on-going basis, we would expect around 1,300 developments on buildings and structures, and 300 of small cell antenna, to require a planning application under the current regulations (again based on their share of current development).
- We make the same illustrative assumption that 50% of the applications identified would no longer require prior approval under the proposed changes. The sensitivity analysis below presents a range of 40% to 60%. Our central assumption implies an annual saving to applicants of approximately £1.5m from c. 650 applications for developments on buildings and structures and £0.3m from c. 150 applications for small cell antennae, at £2,250 per application.
- We are unable to estimate the number of applications for prior approval to upgrade infrastructure in protected areas, but expect the removal of this requirement to generate additional savings to operators.

(2) Moving from a full application process to permitted development with prior approval:

- The statutory time limit for 'other' developments, under which the activities discussed within this triage fall, is 8 weeks. Operators advise that in the last 3 years 9,074 planning applications were considered of which 90% were approved. Of those that were subsequently appealed 72% where successful for operators. Operators also advised that planning applications can take up to 11 weeks to be determined against the statutory time limit of 8 weeks and this is delaying the deployment of infrastructure.
- In the most recent data, covering the 12 months to March 2016, 84% of all planning applications for 'other development' were approved within 8 weeks or agreed time.[1]
- Prior approval can take up to 8 weeks to decide, but provides planning certainty as failing to reach a decision in this time grants automatic approval and the local authority is not able to consider factors beyond the prior approval or the principle of development.

The above shows that the current picture for planning applications presents a degree of uncertainty. Moving as much infrastructure deployment as possible to PDRs with prior approvals, where community engagement is deemed appropriate, provides increased certainty for businesses wishing to expand or upgrade their networks. Whilst applications for planning permission must be decided, and therefore require action on the part of the local planning authority, the prior approval process provides deemed consent if the authority does not respond within the 8 week (56 day) period.

Furthermore, in determining the application, the local planning authority cannot consider factors beyond the scope of the prior approval or the principle of the proposed development. These changes provide

[1] DCLG Live Table P124

certainty that the approval will be made within 8 weeks compared to the uncertainty for planning applications, which operators advise can take up to 11 weeks.

Work compiled by Arup in 2009, on behalf of the department, suggests that the submission of a planning application can cost up to double that of an application for prior approval, although this may be due to the fact that full applications are typically required on more complicated sites.[2] The MOA's response to the Call for Evidence in 2015 suggested that there was no difference in the cost to an operator of a full planning application compared to an application for prior approval

Businesses that are now able to use the prior approval process will benefit from the certainty of determination within an 8 week period, but we have not been able to estimate a monetary value for this increased certainty or of the potential decrease in the time taken to receive approval in applications which are currently determined after 8 weeks. As stated above, the monetary cost of preparing an application for prior approval is considered to be the same as for a full planning application.

(3) Extending the length of permitted development rights for emergency works

Operators currently have a right to temporarily deploy moveable mobile infrastructure on land in an emergency for up to 6 months in order to provide service during works to other, permanent infrastructure. In some cases, these works exceed 6 months, in which case operators will often be forced to move their moveable infrastructure to an alternative site as they will no longer have planning permission to use the existing site, or time to seek planning permission from the local authority to do so. It is not clear how many sites are affected by this, although the MOA suggest the number of instances of operators having to move to another temporary site in such circumstances could be "in the hundreds" across all operators. The MOA highlight cases in which the cost to the operator of moving to another temporary site as a result of LPA enforcement action was between £30,000 and £60,000. These costs include equipment delivery and set up, and additional security, legal and management costs associated with a new site, as well as the need to negotiate wayleaves with landowners to allow use of the land. They do not include the cost of hiring equipment, which is incurred under both the proposal and the counterfactual. Based on the MOA advice that the number of instances of operators having to move sites could be 'in the hundreds' we assume a range of 100 to 300 temporary sites a year will need to continue works for longer than 6 months and involve the operator having to move their moveable infrastructure to an alternative site. The MOA have agreed that the assumption of 100 to 300 temporary sites affected is a reasonable one. This suggests a range for the costs of moving to a new site, which will be avoided under the proposed extension of time, of between £3m and £18m a year. Our central estimate is a £9m annual benefit to business from this measure.

Summary

- Assuming implementation in October 2016, we estimate the total benefits of these proposals as follows (using our central estimates):

Table 1: Benefits to mobile operators, £m, 2015 prices

Policy Year	0	1	2	3	4	5	6	7	8	9	Total
Savings resulting the removal of the requirement for prior approval relating to:											
Buildings and structures	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	14.6
for 4G	1.3	0.3									1.6
Small cell antennae	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	3.4
for 4G	0.3	0.1									0.4
Extending masts	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	1.4
Savings resulting from extending the length of permitted development rights:											

[2] DCLG (2009) Benchmarking the Costs of Preparing and Submitting a Planning Application: http://webarchive.nationalarchives.gov.uk/20120919132719/www.communities.gov.uk/documents/planningandbuilding/pdf/benchmarkingcostsapplication.pdf

Emergency works	9.0	9.0	9.0	9.0	9.0	9.0	9.0	9.0	9.0	9.0	90.0
Total	12.5	11.3	10.9	10.9	10.9	10.9	10.9	10.9	10.9	10.9	111.5
NPV	12.5	11.0	10.2	9.9	9.5	9.2	8.9	8.6	8.3	8.0	96.2

In the cases where applicants are no longer required to seek prior approval there will be significant benefits. There will no longer be a delay of up to 8 weeks between seeking and gaining approval and an increase in certainty as a result of permitted development rights. Applicants will not incur the cost of some applications, and operators will not need to move between temporary sites to complete emergency works. The total benefit to business is estimated to be £10.8m (EANCB basis, 2015 present value and 2014 prices).

The wider economic impact

Increasing the number of antennae that can be installed may lead to decreased visual amenity. However, very few locations should have a negative impact when sited appropriately. Although some installations may be on previously undeveloped sites, many will be on existing sites or on sites used for commercial or industrial purposes. Any impact is therefore expected to be very minor.

It is considered that the decrease in visual amenity may be further mitigated by an expected further rationalisation of sites as a result of these changes. Hence any minor visual amenity costs may be offset by a reduced requirement for infrastructure that was otherwise planned.

Any residual effect may be further offset by the increased convenience of improved mobile coverage. Improved mobile services in protected areas may assist in providing emergency responses to the resident and visiting population. In addition, individuals and businesses will benefit from wider access to mobile telecommunications particularly 4G for superfast mobile broadband. As such, this will provide freedom to expand and improve their existing businesses, and will be able to grow and thrive without the disruption and cost of relocating to other areas which currently has better access to telecommunications. The online economy is very strong in the UK and the proposals in this consultation will support its continued growth.

Risks and assumptions

Our assumptions are detailed in the discussion of costs and benefits above.

Direct costs and benefits to business calculations (following OITO methodology)

Option 1 offers the most benefit to business applicants in cases where applications are avoided.

The Equivalent Annual Net Cost to Business (2014 prices, 2015 present value) is - £10.8m i.e. a benefit to business.

Annex – Sensitivity analysis

Low case: assumes 60% of applications for works on buildings and structures or small cell antennae which currently require a full planning application will require prior approval; 100 sites for emergency works will benefit per annum at £30,000 per site

Table A1: Benefits to mobile operators, £m, 2015 prices

Policy Year	0	1	2	3	4	5	6	7	8	9	Total
Savings resulting the removal of the requirement for prior approval relating to:											
Buildings and structures	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	11.7
for 4G	1.0	0.3									1.3
Small cell antennae	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	2.7
for 4G	0.2	0.1									0.3
Extending masts	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	1.4
Savings resulting from extending the length of permitted development rights:											
Emergency works	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	30.0
Total	5.9	4.9	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	47.4
NPV	5.9	4.7	4.3	4.1	4.0	3.9	3.7	3.6	3.5	3.4	41.1

High case: assumes 40% of applications for works on buildings and structures or small cell antennae which currently require a full planning application will require prior approval; 300 sites for emergency works will benefit per annum at £60,000 per site

Table A2: Benefits to mobile operators, £m, 2015 prices

Policy Year	0	1	2	3	4	5	6	7	8	9	Total
Savings resulting the removal of the requirement for prior approval relating to:											
Buildings and structures	1.8	1.8	1.8	1.8	1.8	1.8	1.8	1.8	1.8	1.8	17.6
for 4G	1.5	0.4									1.9
Small cell antennae	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	4.1
for 4G	0.4	0.1									0.4
Extending masts	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	1.4
Savings resulting from extending the length of permitted development rights:											
Emergency works	18.0	18.0	18.0	18.0	18.0	18.0	18.0	18.0	18.0	18.0	180.0
Total	22.2	20.8	20.3	20.3	20.3	20.3	20.3	20.3	20.3	20.3	205.5
NPV	22.2	20.1	19.0	18.3	17.7	17.1	16.5	16.0	15.4	14.9	177.2