The Mobile Infrastructure Project

STATEMENT IN SUPPORT
OF
AN APPLICATION FOR PLANNING PERMISSION

August 2015

Arqiva

Ref: NYO4352
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The Mobile Infrastructure Project

This application is for the development of a new ground based telecommunications mast as part of the Mobile Infrastructure Project. The Mobile Infrastructure Project (MIP) is publicly funded by the Department for Culture, Media and Sport (DCMS), and it will extend mobile phone coverage to a number of communities across England, Scotland, Wales and Northern Ireland where no coverage is currently available. These areas are referred to as ‘not spots’.

The not spot area may already be disadvantaged through other locational factors, such as lack of economic choice and opportunity. Government is investing to build new infrastructure through the Mobile Infrastructure Project to improve mobile connectivity in some of the more remote areas of the UK that currently receive no coverage from any network. The MIP is one of the 40 top priority projects identified in the National Infrastructure Plan.

The Benefits of the MIP

The MIP brings considerable and varied benefits of high speed wireless communications to assist in reducing the digital divide, increasing economic opportunity and improving the social wellbeing of the local population.

By providing these benefits it’s argued that the MIP assists in achieving the goals of sustainable development. This is in accordance with the statutory duty placed upon local planning authorities and accentuated by the presumption in favour of sustainable development within the National Planning Policy Framework (NPPF).

Technical and Operational Constraints

The development proposed is framed in the context of the existing MNOs networks. These impose particular locational and siting requirements. The technical justification
included within this application clearly demonstrates the need for the apparatus proposed within the context of the operators surrounding networks.

**Site Selection**

In accordance with best practice site sharing, utilisation of existing buildings and structures has been explored in a sequential approach to best meet the operational need whilst minimising environmental impact. However, in this case this has not been possible. A new structure is therefore proposed to deliver the required level of service.

**Pre-Application Consultation**

Information on the MIP and the general locations being considered for the installation of shared base stations to provide coverage to not spots was provided to the Local Planning Authority (LPA) in October 2013 and Autumn 2014. Further pre-application consultation in relation to the application site was undertaken with the LPA in July 2015. Three specific matters were raised by the LPA and these are discussed in further details below.

**Compliance with Planning Policy and other Material Planning Considerations**

Policy at national level is set out in the NPPF. The NPPF views high quality communications infrastructure and systems, such as the coverage provided by MIP, as essential for sustainable economic growth.

The financial constraints and time limits of the MIP are also material planning considerations, as any undue delays or issues associated may result in the proposed site’s cancellation and subsequent re-allocation of funds to fulfil another not spot area.

The local development plan comprises of the North York Moors Core Strategy and Development Policies (Nov. 2008). In review of these policies, the application demonstrates that the proposal is in accordance with the Local Development Plan and in particular Policies relating to *telecommunications, supporting economic development, and maintaining the environment*. Consideration has also been given to any policies which may weigh against the proposal. In addition consideration has given to the need
for the development being in the wider public interest and an appropriate balance has been struck between the objectives of developing new high quality communications infrastructure and environmental considerations. It is considered that on balance the proposal offers greater benefit than harm and therefore should be acceptable in principle.

The site chosen falls within the North York Moors National Park where the guidance in section 11 ‘Conserving and enhancing the natural environment’ of the NPPF applies. All reasonable steps have been taken to minimise any perceived visual and environmental impact whilst having regard to the need to provide the required level of mobile coverage. Furthermore, the not spot area falls entirely within the North York Moors National Park, as such no site outside this designation can be used as an alternative to provide the specific locational coverage required.

With regards to design, layout and scale, this has been guided by the special technical and operational requirements that are associated with electronic communications development. Good practice guidance requires careful consideration of the siting and design to minimise appearance and to ameliorate potential visual impact.

**ICNIRP Compliance**

The proposed antennas comply with all relevant health and safety requirements, in accordance with ICNIRP guidelines. A certificate of compliance has been provided with this application.

**Servicing and Maintenance**

The site will require periodic access for maintenance and servicing visits. This will be restricted to authorised personnel only, and therefore the proposal does not give rise to any issues associated with public access.

In conclusion, the proposed development has been sited and designed with reference to pre-application consultation in order to locate the mast as sensitively as practicable. Specific consideration has been given to technical requirements and national and local
planning policy. The proposal is state funded and will provide a one-time opportunity to provide vital communications coverage to the local area. The proposal is supported by both local and national planning policy, and as such it is considered that the application should be looked upon favourably.
1. INTRODUCTION

1.1 This statement is submitted in support of an application for planning permission in respect of the installation of a 15m communications mast at land at Riccal Heads, Grange Farm, Spaunton Bank. The development proposed is shown in detail in the drawings submitted and is a shared base station required as part of the Government’s Mobile Infrastructure Project (MIP). This project seeks to provide coverage by all four Mobile Network Operators (Vodafone, O2, 3 and EE) to communities and businesses that live and work in areas of the UK where existing mobile network coverage is non-existent. These areas are commonly referred to as ‘not spots’, a term used throughout this document.

1.2 The principal elements of this beneficial proposal are as follows:

- The development of a new shared radio mast 15 metres high of lattice construction.
- The installation of sector and dish antennas on the mast.
- The installation of ground based radio equipment housing.
- The installation of security fencing with gated access.
- The provision of an access track.
- The installation of cabling and associated development.

1.3 As necessary, any uncontaminated earth and materials excavated will be reused for fill and levelling.

1.4 The radio equipment housing will need to be mechanically ventilated to avoid overheating of equipment. The ventilation equipment is only likely to operate during the day during hot weather. If it is considered specific noise attenuation measures to be necessary, we would be pleased to discuss practicable solutions.
1.5 The application has been brought forward on a consultative basis to ensure that relevant stakeholders understand the principle aim of this Government sponsored project, which is to help end the digital divide experienced in the not spot areas by bringing the considerable benefits of wireless communications.

1.6 In October 2013, the Council was provided with information about the MIP, including a map indicating the general locations being considered for shared base stations, and a copy of Arqiva’s Principles and Guidelines for the Sensitive Siting and Appearance of Mobile Communications Base Stations. Additional consultation took place in Autumn 2014 when the Council was provided with an update on the project, including information on any changes to the locations being considered for the development of the base stations.

1.7 In addition, your views have been specifically consulted about the detailed siting and design of this proposal, along with other relevant stakeholders. Where practicable any suggestions have been incorporated into the final scheme. A full summary of the consultation undertaken prior to the submission of this application is provided in section 7 of this statement.

1.8 This statement incorporates the design and access statement, but first we explain further the MIP and the public benefits associated with proposal. We also explain the particular need in this case and demonstrate compliance with planning policy.
2. THE MOBILE INFRASTRUCTURE PROJECT

2.1 The deployment of the first generation (1G) mobile networks commenced in the mid-1980s and these networks have long been superseded. The second generation (2G) mobile networks that provide mainly voice and text services were launched in the early/mid 1990s. The current third generation (3G) mobile networks were launched in the early 2000s and are currently being enhanced to provide superfast broadband speeds that can handle the full spectrum of media services, e.g. internet connections with online and real time streaming of visual media and a range of safety, information, educational and entertainment applications. The Government has recently awarded spectrum licences for the deployment of fourth generation (4G) mobile networks, which will operate at far higher speeds, allowing a far greater range of data hungry applications, such as streaming High Definition visual media.

2.2 Reflecting the transformation in services now on offer, the 3G networks support a range of devices that go beyond a simple voice and text handset, to smart phones, tablets, netbooks, laptops, e-readers, satellite navigation systems and a host of gaming devices. This will be greatly enhanced through the deployment of 4G networks that will be available on a widespread basis over the next few years.

2.3 The not spot areas do not even have the equivalent of a 1G service and so are becoming increasingly disadvantaged. This is a serious social and economic issue, because public usage of mobile communications has also changed from being mainly for business or luxury use, with a few million privileged customers, to a position where there are now more mobile network subscribers than the UK population as many people have more than one connected device.

2.4 Public demands and service expectations have also grown immeasurably as the handset manufacturers and software engineers produce an increasing array of innovative devices and services. Businesses place growing reliance on mobile communications as a means of improving responsiveness and productivity. Mobile services and applications now also offer the means to advertise in a very
targeted way. The young population in particular expects to be connected at all times as mobile devices are their main or only means of accessing popular social network sites.

2.5 The ability to keep in contact or call emergency services immediately is also something that many rely on. This has implications for both the extent and quality of coverage. Long gone are the days when people were pleased if they could place a call standing in their garden. More importantly, long gone are the days when car crash victims in the middle of the night were reliant on the help from a passing car or finding a nearby farmhouse from where to call the emergency services.

2.6 The importance of mobile communications technology in the UK is one of the topic areas covered by Ofcom’s annual Communications Market Review reports. In its July 2012 edition\(^1\), Ofcom reported that in 2011 the number of active mobile connections in the UK increased slightly to 81.6m compared to 33.2 million fixed landline voice connections, reflecting the continued importance of mobile communications to residents and businesses.

2.7 In its May 2013 update, ‘The availability of communications services in the UK’, Ofcom summarised the importance of access to communications in the following terms:

> “3.2 Communications services provide people with access to political, educational and cultural activities and resources. The availability of such services matters because a lack of availability results in reduced (or non-existent) access to such resources. Reduced access can be compounded, typically in rural and remote areas, by a lack of other public services, such as libraries or public transport.

> 3.3 Access to communications services provides benefits to both individuals (for example, by providing the means to stay in touch with friends and family), businesses (for instance as a means to engage with suppliers and customers)

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\(^1\) Communications Market Report 2012, published by Ofcom, 18 July 2012
and society as a whole (for example, by providing educational resources that result in a more skilled and informed population). The development of digital communications services and the movement into the digital age have made communications services an increasingly integral part of our daily lives. The UK Government estimated “the typical British consumer spends nearly half of their waking hours engaged in one form or another with the products and services of the communications sector.” Digital communications services are used increasingly to participate in civil society, to learn and develop, to keep in touch, to share information and for entertainment, among other activities. The increasing integration of digital communications services within daily life has resulted in both an increase in the scale and significance of their associated benefits and the implication that increasingly fewer adequate substitutes are available to those who do not access them.”

2.8 Further, the Ofcom research ‘Consumer Views on the Importance of Communications Services and their Affordability’ (July 2014) highlighted the following:

- “Mobile services are now seen as essential or important for most consumers to access voice calls and text-based communication, except for older consumers who continue to rely on landline for voice services.
- The way that people communicate with each other has changed significantly in the last ten years.
- Over nine in ten adults now have a mobile phone, using it for voice and text and, increasingly, instant messages and other internet communication.
- More recently, smartphone ownership and use of internet on the go has increased rapidly, with just over half of UK adults owning a smartphone in 2013.”

2.9 In March 2015, an independent report was published by RAND Europe “Estimating the value of mobile telephony in mobile network not-spots”, commissioned by the DCMS. The report looked at the impact of no network
coverage on different rural population segments and had several key findings which support the need for the MIP:

- A lack of mobile phone signal impacts rural businesses. Almost half of those asked said it had a negative impact on profit, turnover and productivity

- Local residents and visitors are willing to pay for better mobile coverage. The further people have to travel for 2G signal, the greater they are willing to pay for local services

- Among both residents and businesses, a key reason for having a mobile phone is to deal with emergencies

- In not-spot areas, over 97 per cent of residents and local visitors own a mobile phone for personal use

- Availability of mobile services may affect the long term sustainability of rural communities. Mobile coverage could be an important factor in ensuring the diversity of rural economies

2.10 The public benefits of mobile communications are, therefore, varied and considerable and some further examples are set out in Appendix 1. It is for these reasons that the National Infrastructure Plan and the National Planning Policy Framework place such emphasis on encouraging the continued rollout and improvement of digital infrastructure networks of which the MIP will form a key part.

2.11 Whilst most of the UK population can take mobile services for granted, coverage is not universal and for those without coverage the disadvantages become greater over time, increasing the digital divide between those with connectivity and those without. Coverage can only be gained by receiving a good quality wireless signal from a mobile base station and these can only transmit and receive signals over a limited geographical area. The cost of deploying base station sites and the ongoing operational costs are significant and so the Mobile
Phone Network Operators (MNOs) have not deployed base stations in many remote areas on economic grounds.

2.12 The MIP, which forms part of the Government’s National Infrastructure Plan 2014, seeks to remedy this position in not spot areas, which being generally in remote locations, may already be disadvantaged through other locational factors and lack of economic choice and opportunity. To aid the economics the Government is investing to facilitate the development of new base stations that will provide connections to all MNOs, rather than a single network or one shared by only two operators.

2.13 This gap funding is only available for sites until the money is spent or by March 2016, whichever the earlier.

2.14 In addition to coverage to the not spots, the proposed installation will also have the added benefit of providing better mobile coverage over the wider area. This will therefore improve other partial not spots (i.e. areas where some, but not all MNOs may provide service) and so enable local people within this area to enjoy better services whichever network they subscribe to.

2.15 The MIP supports a number of UK Government initiatives, including:

- National Infrastructure Plan, December 2014. The MIP is one of the 40 top priority infrastructure projects included in the plan
- Digital Britain Report, Department for Culture Media and Support, June 2009
- The National Planning Policy Framework, especially sections 5 and 11

2.16 The MIP is also an integral part of a package of Government and telecommunications industry measures that seek to extend and improve mobile coverage in rural areas across the UK. On 3 February 2015, the Culture Secretary Said Javid MP announced that agreement had been reached with the MNOs to vary their licences from the current requirement to provide coverage
over 90% of the UK population to 90% of the UK’s geographical area. Provided below is an extract of the announcement posted on the Department for Culture, Media and Sport’s website\(^2\) that summarises this agreement with the section of most relevance to the MIP highlighted in bold for ease of reference:

‘...Under the agreement – a first ever – all four of the mobile networks have collectively agreed to: £5bn investment programme to improve mobile infrastructure by 2017 - potentially creating jobs and a boost for the UK economy; guaranteed voice and text coverage from each operator across 90 per cent of the UK geographic area by 2017, halving the areas currently blighted by patchy coverage as a result of partial ‘not-spots’; full coverage from all four mobile operators will increase from 69 per cent to 85 per cent of geographic areas by 2017; and provide reliable signal strength for voice for each type of mobile service (whether 2G/3G/4G) – currently many consumers frequently lose signal or cannot get signal long enough to make a call’.

The Minister went on to advise that the deal would cut not spots where there is currently no mobile coverage by two-thirds and that this would help support the Government’s existing Mobile Infrastructure Project.

2.17 Ofcom is currently consulting on the proposed change to the MNOs’ licences, which is now being referred to by them as the “geographic coverage obligation”. Whilst this will have the side benefit of addressing some complete not spots, it is targeted to address partial not spots. The Government’s announcement confirms that MIP remains the principal means of providing coverage to the complete not spots within the remaining 10% of the UK.

2.18 Implicit within the Government’s objective to move towards 100% geographical UK coverage is the recognition that macro base station sites, like the one proposed, will need to be developed within nationally important landscapes such as Areas of Outstanding Natural Beauty and National Parks. This is because

\(^2\) Available at: [https://www.gov.uk/government/news/mobile-operators-sign-up-to-coverage-improvements-2](https://www.gov.uk/government/news/mobile-operators-sign-up-to-coverage-improvements-2)
such installations remain the principal means for providing the umbrella of coverage that will be needed to meet this objective. This new objective is therefore an important material planning consideration in the determination of this application.

2.19 It is also worth reflecting that mobile communications have only been with us for about 30 years and every ten years or so we move towards the next generation of technology. The planned life of the MIP base stations will therefore see through to 6G. Whilst we do not know what that may bring, we can be certain that it will be faster, better, more versatile and support a range of applications and devices, some of which may not have been invented yet.

2.20 Indeed, to illustrate this point, tablets and smart phones have only been around for about five years and they have transformed the way in which people use and increasingly rely upon mobile connectivity.

2.21 The Government is also in the process of issuing a new contract for an emergency services network, which will replace the one operated by Airwave. In all probability that will also be based upon a 4G network and bring with it the benefits of a network capable of handling greater amounts of data and providing better services. For example, some ambulances already contain heart monitors connected to specialist cardiac units across 4G networks. These enable paramedics to be given guidance on life saving treatment, to be guided to the appropriate hospitals if an operation is required and to help medical teams prepare themselves as a victim is brought in. One can only imagine the connected life-saving apparatus that an ambulance of the future will be fitted with.

2.22 The MNO Telefónica UK, which operates the brand O2, has also won the contract for Smart Metering in the south and central England with Arqiva being appointed in the north of England and Scotland. Telefónica’s solution is based upon 4G technology and hence requires a network of base stations in place to provide the required network coverage. Arqiva’s solution also involves the shared use of broadcast and other telecommunications sites to provide coverage.
2.23 With MIP sites future proofed to facilitate 4G and beyond if deployed by the MNOs, the proposed base station will be able to absorb these emerging network requirements and support future devices and applications. Without the capital funding associated with the MIP and the on-going sharing of operational cost, there is a very real prospect that if sites do not progress the areas they are planned to cover will end up in the last few per cent where coverage may never be provided, with all the consequences of being left behind as mobile connectivity advances elsewhere. The digital divide that already exists will therefore become much more pronounced over time.

2.24 In summary, the MIP is the key Government project to help address coverage in what will be the last 10% of the UK and considerable weight should be afforded to that. Implicit within the newly announced Government target on coverage is an acceptance that this will require new macrocell base stations within nationally important landscapes such as National Parks and AONBs. It is the only initiative that seeks to extend the umbrella of mobile coverage for all the MNOs to the complete not spots, and the MNOs involvement with the MIP demonstrates that the development of the MIP base stations is an inherent and fundamental operational requirement of this nationally important initiative.

2.25 Arqiva is the selected supplier chosen by Government to deliver the MIP with the co-operation of the MNOs. Arqiva is an electronic communications code operator and owns and operates the UK terrestrial television broadcast network, together with a significant proportion of the radio broadcast network. Arqiva is, therefore, experienced in planning, deploying and operating electronic communications networks that comprise Critical National Infrastructure.
3. SUSTAINABLE DEVELOPMENT

3.1 Whilst mobile communications are a public service of great economic and social benefit, they also make a significant contribution to the attainment of often elusive objectives relating to sustainable development. In view of the statutory duty placed upon local planning authorities under Section 39 of the Planning and Compulsory Purchase Act 2004, and accentuated by the presumption in favour of sustainable development now within the National Planning Policy Framework (NPPF), this contribution merits highlighting.

3.2 Having regard to the Government's three key dimensions for sustainable development within the NPPF, mobile communications will assist in a number of ways. With reference to, and in addition to the examples of the many benefits of mobile communications, sustainable objectives will be supported in the following ways:

- **An economic role** - modern communications in all their different and emerging forms, including mobile communications, help maintain high and stable levels of economic growth and employment. Hence, the UK Government's continued commitment to the growth and development of modern electronic communications.

- **A social role** - modern communications, including mobile communications, aid social progress, which recognises the needs of everyone. This manifests itself in a number of ways as illustrated by the following examples:

  - Extending economic opportunity through faster and more flexible means of communication capable of handling large volumes of data. This is particularly important to those who live in remote areas, where economic opportunities might be more limited particularly amongst the more socially disadvantaged, with poorer access to transport.
Enabling flexible forms of working that provide opportunities to working parents or carers and help them achieve a better work life balance with both family and community benefits.

By providing means of communication that improve convenience and enhance personal safety and security. This is especially important to vulnerable groups who may otherwise feel unable to participate in certain activities.

By aiding social inclusion through connectivity with friends and family, including use of social networking sites.

- **An environmental role** - modern communications, including mobile communications, provide effective protection of the environment by helping reduce the need to travel by enabling modern working practices such as greater home working. Such practices reduce the need for travel and can alleviate the pressure for new commercial development such as offices, through more efficient and flexible use of existing accommodation. For the same reasons, modern communications, including mobile communications, help ensure the prudent use of natural resources.

3.3 However, to make this important contribution to sustainable development objectives and to provide the range of services demanded by the public, mobile networks do need to be supported by an infrastructure of base stations, as explained above. Without a network of base station in place, mobile coverage will simply not be provided. This is no different than railway services, for example, being reliant on the associated infrastructure of lines and stations. In the next section, the operational requirement relevant to this application is explained.
4. **THE MIP REQUIREMENT**

The Need for a New Base Station

4.1 A new base station is needed as part of the MIP to help provide mobile coverage over a not spot that affects the wider area around Hutton le Hole.

4.2 Section 6 of the Code of Best Practice on Mobile Network Development in England, published in July 2013, explains how cellular networks operate. In essence, the network is like a patchwork quilt, with each patch or cell operated by a base station. To obtain connectivity a customer must be within a cell in the first place. If the customer moves between cells then the network automatically switches the connection from one cell to another. This is why the system is mobile, but the process breaks down if the customer tries to make a connection in a geographical area where no cell exists and/or moves from an area of coverage to one without and so drops the connection. Most customers will have experienced the frustration of the occasional dropped call or inability to connect, but in not spot areas this is a constant factor.

4.3 The Government has, with the co-operation of Ofcom, the industry regulator, and the MNOs, identified the geographical areas where no signal can be reliably obtained from any mobile network – i.e. areas that suffer from a total not spot in coverage. The Government has then prioritised the areas that contain settlements for the purposes of the MIP project.

4.4 To overcome this problem, a network plan has been prepared to identify locations where shared base stations will be developed to provide coverage to not spots. In respect of the proposed base station, the accompanying Technical Justification Statement includes a radio simulation plot showing the extent of coverage to be provided in this case.

4.5 In supplying this radio plot, it is worth emphasising that it is a computer generated estimate. This estimate tends to over-estimate true levels of coverage on the ground, because it is difficult to predict accurately all the factors that may attenuate the radio signal such as natural features like large trees and woodland,
or manmade features like buildings and cuttings. However, it is a useful tool for illustrating how a new base station will provide coverage to end the not spot affecting the wider area.

4.6 Under the MIP process, the Government, through representatives of the DCMS and the MNOs have approved the network plan and with it the objective of providing coverage over the not spot identified in the wider vicinity of the site.

Site Selection Considerations

4.7 In searching for a new site, we have been guided by the Arqiva Principles and Guidelines for the Sensitive Siting and Appearance of Mobile Communications Base Stations. This builds upon existing policy and best practice, but has been tailored specifically for the MIP, which seeks to cover not spot areas in areas of high landscape quality such as National Parks and Areas of Outstanding Natural Beauty.

4.8 Site selection is constrained by a number of operational and technical considerations. The network planning has been carried out with the unique challenge of dovetailing with four existing MNO networks. This has, however, been assisted by the network consolidation that has already been carried out, i.e. with T-Mobile and Orange sharing under the banner Everything Everywhere, with combined network infrastructure also with "3"; and Vodafone and O2 combining under the Cornerstone Telecommunications Infrastructure Limited flag. The existing MNO sites along the edge of the not spot areas, therefore, form fixed points in the sand. With as previously explained, no MNO base stations within this area, existing Arqiva broadcast sites have formed other points, necessary to satisfy the statutory and policy requirement to share existing sites and masts, where practicable.

4.9 To ensure the proper operation of the network plan, sites must be within a short radius of a cell nominal, i.e. an Ordnance Survey set of co-ordinates derived from the plan. Sites must be at high points, above buildings, trees or other obstacles.
that would block signals, to ensure the antennas can transmit and receive over the proposed cell area.

4.10 In addition to the antennas required for cell coverage, there is a requirement for 2 transmission dishes. These dishes, which operate like searchlight beams, provide relay links for other installations and ultimately to link this and other sites with the nearest Mobile Switching Centre (as described in the Glossary in the Code of Best Practice). Dishes are subject to specific technical and location constraints as they operate on a fixed point-to-point basis and, therefore, require direct ‘line of sight’ with dishes on corresponding installations in the wider area. Manmade features such as wind turbines, buildings and other tall infrastructure have the potential to interfere with these links, as do natural features such as trees, hills and valley sides.

4.11 Sites must also have the following characteristics:

- They must be environmentally suitable, i.e. where any inevitable and associated impact is within acceptable parameters;
- They must be available on reasonable commercial terms;
- They must be capable of being developed, e.g. without unstable ground conditions;
- They must have safe and satisfactory vehicular access for construction and future maintenance and servicing;
- They must afford a reasonable degree of security;
- They must be supplied with power or capable of having an economic supply connected;
- Ideally they will offer scope for accommodating future requirements, e.g. sufficient room at ground level for further equipment cabinets.
The Search for a Suitable Site

4.12 There is a statutory requirement imposed by General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, to share the use of electronic communications apparatus where practicable. The MIP is the first project where geographical areas will be covered by a network of sites shared by all MNOs and so this requirement is clearly met in this respect.

4.13 The statutory requirement to share existing electronic communications structures is extended through planning policy to include any other high structure. Planning policy is examined in more detail in the following sections but, as explained below, there are no existing MNO sites and in this case and there are no existing Arqiva broadcast structures that can be shared. Furthermore, there are no other electronic communications sites in the locality that can be shared and no opportunity to make use of tall buildings or other structures to meet the coverage requirement.

4.14 The following structures were identified as worthy of exploring, but for the reasons given were found to be unsuitable and/or available:

- No suitable buildings or structures were identified

4.15 As can be seen below, a thorough search has been undertaken that has had due regard to environmental considerations, especially the need to reduce to an acceptable level the potential visual impact of a new mast.
<table>
<thead>
<tr>
<th>Site</th>
<th>Location</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>D1</td>
<td>Grange Farm</td>
<td>Previously considered however the location now conflicts with the landowners ongoing and proposed operations on the land.</td>
</tr>
<tr>
<td>D2</td>
<td>Riccal Heads, Hilltop Farm</td>
<td>The landowner was contacted however confirmed that an installation would not be acceptable on their land.</td>
</tr>
<tr>
<td>D3</td>
<td>Grange Farm</td>
<td>A further location was considered at Grange Farm however, this location would not reach coverage targets due to topography</td>
</tr>
<tr>
<td>D4</td>
<td>Land north of Hutton le Hole</td>
<td>A location here would be too low to achieve LOS</td>
</tr>
<tr>
<td>D5</td>
<td>Westfield Farm Campsite</td>
<td>The land here was too low to achieve LOS and would also have resulted on less premises being covered</td>
</tr>
<tr>
<td>D6</td>
<td>Westfield Farm</td>
<td>The land here was too low to achieve LOS and would also have resulted on less premises being covered</td>
</tr>
<tr>
<td>D7</td>
<td>Westfield Wood</td>
<td>This land was suggested to us and was investigated by the radio team however was found to not achieve LOS</td>
</tr>
<tr>
<td>D8</td>
<td>Land north of Spaunton</td>
<td>This location would provide coverage to Lastingham and is being progressed as a separate site – it would not provide coverage to Hutton le Hole</td>
</tr>
<tr>
<td>D9</td>
<td>Land opposite High Cross Plain</td>
<td>The land here was too low to achieve LOS and would also have resulted on less premises being covered</td>
</tr>
<tr>
<td>D10</td>
<td>Land off Keld Lane</td>
<td>The land here was too low to achieve LOS and would also have resulted on less premises being covered</td>
</tr>
</tbody>
</table>
In addition, and notwithstanding the National Park status of the land, in looking at the suitability of any location due regard has been had to any amenity, planning, heritage and environmental designations. The most pertinent of which can be seen below.

4.16 In terms of both providing coverage to Hutton le Hole and getting LOS, to get the signal back into the MNOs networks, then it became very obvious that only some land would be able to achieve both these objectives i.e. the higher land surrounding the village.

4.17 Therefore, the application site has been selected as meeting the operational requirements of the MIP. The radio plot in the accompanying Technical Justification Statement shows how the not spot will benefit from mobile coverage. In addition, the site fulfils the other operational requirements and importantly also, strikes the best balance between the technical and environmental considerations that apply in this case. We amplify upon this in the next sections.

4.18 As part of the MIP process, the MNOs have approved the site and hence we are able to make this planning application.
5. COMPLIANCE WITH PLANNING POLICY

5.1 The relevant planning policy framework that has been taken into account and in part already alluded to is found principally within:

- The Development Plan, which comprises the North York Moors National Park Core Strategy and Development Policies.
- National Planning Policy Framework (NPPF);

5.2 From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development.

The General Policy Background

5.3 The general national planning policy background found now within the NPPF can be summarised as follows:

- Government policy is to support high quality communications infrastructure and systems, as essential for sustainable economic growth;
- Government policy is to keep the inevitable environmental impact associated with electronic communications development to the minimum;
- The key way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites;
- The starting point for planning new networks or the expansion of existing networks is, therefore, to use existing electronic communications sites owned by other operators or radio site management companies, such as Arqiva;
• Great weight should be given to conserving landscape and scenic beauty in certain specified designated landscapes, e.g. National Parks, Areas of Outstanding Natural Beauty, Conservation Areas, etc.;

• The emphasis on minimising environmental impact is greater according to the sensitivity of the site. The emphasis on exploring and utilising site sharing opportunities is consequently higher in these circumstances;

• Best practice encourages a consultative approach and one that seeks to minimise potential visual impact.

5.4. The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. The NPPF recognises that this is especially relevant where a development might have other significantly important benefits such as being essential to meet, for example, sustainable economic growth or a national need which can include new infrastructure.

5.5 The MIP itself is clearly an important material planning consideration as it is precisely the type of new digital infrastructure that the NPPF is seeking to support. This is a Government sponsored project established with the specific purpose of eradicating not spot areas by providing communications services to local communities and business currently without access to such services. The financial and timing limits of the MIP are also material planning considerations, because any undue delays or issues associated with a project are likely to lead to its abandonment, with the opportunity to eradicate the not spot area being lost, in all probability forever.

5.6 Hence, it is important to reflect on some key points within the NPPF which are relevant to the very important development at enter description of the site and the general planning principles that should apply when determining the merits of the application:
a. Paragraph 14 advises that authorities should:

- positively seek opportunities to meet the development needs of their area [as part of plan making];
- meet objectively assessed needs unless the adverse effects would “significantly and demonstrably outweigh the benefits”;

b. Paragraph 17 advises that planning should “proactively drive and support sustainable development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs” [my emphasis];

c. Paragraph 19 states that “planning should operate to encourage and not act as an impediment to sustainable growth … significant weight should be placed on the need to support economic growth through the planning system”;

d. Paragraph 187, on “decision-taking” states that authorities should “look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible”.

5.7 Paragraph 14 of the NPPF further states that the presumption in favour of sustainable development lies at the heart of the planning system and, in respect of decision-taking, this means that development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully will all relevant Development Plan policies and, therefore, permission should be granted for the development.

Supporting Advanced Communications Infrastructure of the NPPF

5.8 The proposal is also supported by, and accords with, the guidance in Section 5 of the NPPF, which provides further guidance on the Government’s objective of supporting the provision high quality communications networks such as the MIP in England.
5.9 The NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this has to include an understanding of the associated special problems and technical needs of developing communications networks such as the MIP.

**Landscape Protection**

5.10 Section 11 ‘Conserving and enhancing the natural environment’ sets out the Government’s planning policies for the protection of a range of landscapes and habitats. Paragraph 115 of the NPPF requires that great weight should be given to the objective conserving landscape and scenic beauty in National Parks, as one of the three specified areas that enjoy the highest level of landscape protection in England.

5.11 It is for this reason that paragraph 116 of the Framework advises that planning permission for major developments in a National Park should be refused except in exceptional circumstances where it can be demonstrated that they are in the wider public interest. In considering this guidance, it should be noted that electronic communications installations are relatively small scale engineering operations and, therefore, cannot reasonably be considered to be major developments.

5.12 Notwithstanding this point, the proposed development does not offend any of the three criteria listed in paragraph 116:

- It forms part of the Government’s MIP network, a nationally important infrastructure project that aims to remove not spots by providing mobile coverage to the local area. As explained in the Site Selection section of this statement the application site has been chosen following a comprehensive
search and it strikes the best balance between technical, operational and
town planning considerations. If planning permission is refused for the
development then the opportunity to eradicate the not spot in this area will be
lost, in all probability forever;

- In this case, the required coverage area to remove the not spot falls entirely
within the North York Moors National Park and there is no site outside of the
National Park that can be used as an alternative;

- All reasonable steps have been taken, through careful siting and design, to
moderate the visual impact of the development, having regard to technical
and operational factors. The comprehensive search undertaken, and the pre-
application consultation advice received, demonstrates that there is no
preferable alternative to the application proposal.

**Local Policy Considerations**

5.13 The Development Plan comprises the North York Moors National Park Core
Strategy and Development Policies.

5.14 Other than its location within the National Park is not affected by any
landscape/habitat designation or land use proposal.

5.15 Strategic and local planning policy guidance is found in Development Policy 25
‘Telecommunications’ of the Development Plan. It provides detailed criteria
based guidance and states that:

*The provision of infrastructure for telecommunications and information
technology will be supported where it is of a scale and design appropriate to the
National Park and helps meet the needs of local communities. Proposals for the
errection of telecommunications masts and equipment and any associated
development will be permitted where:*
1 There are no suitable alternative means of provision.

2 There is no unacceptable adverse visual impact upon the character of the locality and the wider landscape.

3 The siting of the installation makes use of the least environmentally intrusive option available.

4 The proposal is part of a co-ordinated, long term strategy for the provision of telecommunications technology.

5 Provision is made for the removal of the equipment when it is redundant

5.16 The development complies fully with this policy:

- In respect of criteria (1 and 4), the shared base station is required as part of the nationally important MIP communications network that seeks to remove not spot areas by providing mobile coverage where none currently exists, and will provide significant socio-economic benefits. The role that the proposed base station will play within the network is illustrated by the submitted coverage plots. As will be ascertained from elsewhere in this statement, there is no other means to provide this mobile coverage as the installation is non-commercial and so very unlikely to be provided under any other circumstances.

- In respect of criteria (2 and 3), all reasonable steps have been taken to minimise the impact of development on local amenity and the National Park through careful siting and design, having regard to technical and operational factors. The principal technical and operational constraints affecting the development are explained elsewhere in this statement, not least the need to develop a mast with sufficient structural capacity to be shared by all four MNOs. Given these constraints, the proposal is the best practicable environmental option.
6. DESIGN CONSIDERATIONS

6.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. However to assist your determination this section provides a description of the process adopted in the design of the proposals and explains the access considerations. The significant contribution such development makes towards sustainable development objectives has already been outlined earlier.

Physical Context

6.2 As discussed above, the technical considerations of the proposal have led to the proposed location. It sits high above the village of Hutton le Hole in agricultural land. This land, part of Riccal Heads is the boundary of the more rolling agricultural lands to the south and the iconic heath moors to the north. There are a number of tree banks on the land mostly on the steep land falling away to the north. These do provide some vertical context for the proposed mast.

Amount, Design, Layout and Scale of the Development

6.3 The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide an acceptable level of coverage to the local area, having regard to the need to minimise visual impact, which have been explained in detail in Sections 2 and 4 of this statement.

6.4 For example, the numbers of antennas and dishes, and their size, is the minimum amount of development required to provide coverage and to link this site into the wider MIP and MNO networks. As explained earlier, the antennas and transmission dishes must be free from obstruction from hills, buildings, trees or large moving objects which can block signals, resulting in a reduction in network coverage or the loss of communication with adjoining sites in the MIP and MNO networks. These factors, together with the need to take account of the
curvature of the earth and differing atmospheric conditions, affect the siting and height requirements of the radio dishes, in particular.

6.5 The choice of lattice mast design reflects the MIP requirement to develop a shared base station that can be used by all of the MNOs to provide mobile coverage to the local area. As a shared structure, the mast has to have sufficient structural stability to handle to load bearings of the antennas, dishes and other electronic communications apparatus, as well as taking into account environmental factors such as wind speeds. Below is the rationale for not choosing a tree mast design, a potential solution raised by the LPA at the pre-application stage.

MIP base stations must support all the MNOs, which requires a large amount of apparatus. However on a conventional mast, they can all be installed on a single head frame. To try and disguise those same antennas on a mast designed like a tree would require them to be vertically separated, which means the structure would have to be taller. As tree designs incorporate an artificial tree spread that extends about 5 metres above the antennas, the resultant structure could be up to 10 metres taller compared to a conventional structure. As the wind loading of such a structure would be very high, but must remain rigid, the artificial trunk would have to be very substantial. As a consequence such a structure would in almost every location look out of place and hence is not being deployed for MIP.

6.6 The mast required cannot be hidden, but any impacts on the landscape and visual amenity will be limited and moderated by confining height to what is required for operational reasons, here the lowest height of any MIP mast currently being proposed at 15m. Compared to other forms of vertical infrastructure also found in National Parks and AONBs the mast proposed is a benign structure: it is much lower than the television broadcast masts that Arqiva own and operate; it is lower and does not form a sting of structures that march across the countryside like pylons; and it does not move like wind turbines, which are typically higher and are usually developed in clusters.
6.7 As described above, alternative designs like shareable tree masts have been considered, but these would require vertically separated antenna arrangements and an artificial tree spread, which would increase overall height by as much as 10 metres. Such structures would also require an unusually thick trunk, with the resultant design being prominent and incongruous in the wider landscape, especially when divorced from groups of trees or woodland. The MIP designs are therefore an appropriate response in terms of minimising and moderating any detrimental effect on the environment.

6.8 The number of radio equipment cabinets and their size has been limited to what is required to meet the MIP’s and MNOs current and foreseeable network requirements. The location of the equipment cabinets, and the electronic communications equipment housed within them, reflects the technical and operational requirement to be in reasonable proximity to the antenna systems and dishes that they support. This avoids exceptionally large runs of feeder cables and associated supporting trays, and the subsequent loss of signals.

Access Considerations

6.9 Access to the site will be provided from the existing access into the field.

6.10 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.

6.11 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.
Landscaping

6.12 The proposed siting of the development has been very carefully chosen to minimise environmental impact. Any potential impact of the development is principally associated with radio mast, which is the most visible component of the base station, and which cannot be fully screened for operational reasons. The height of the mast means that any attempt to screen it in its entirety would be unrealistic in any event.

6.13 The mast is set amongst/against the backdrop of some trees in the foreground of most public views, which will mitigate its impact in views from public vantage points nearby. The use of a lattice tower, which is a relatively open and permeable structure, will give the impression of allowing views through the mast to the backdrop of trees and the sky, thereby minimising its visual impact. However, the LPA raised the potential for some relatively substantial tree planting around the base of the mast and this has been discussed an agreed with the landowner. Obviously this cannot be as tall as to disrupt the signal, however would allow the mast to sit within a grouping of trees and would screen the majority of the mast height. We would hope that an appropriate planting scheme could be suggested by the LPA during the course of the application at which point we could supply amended drawings so that this could be captured as part of any approval, rather than any suspensive condition, which bearing in mind the tight timescales of the project, could lead to critical loss of time for the build program.

Appearance

6.14 The sensitive approach to siting and design should minimise the appearance of the development proposed. In addition, the local topography and natural features should help minimise views. Insofar as the mast and compound may be visible they should look straight forward in appearance and reflect their function. To that extent they should in time become accepted features of the local environment as with other forms of communications networks and essentially public utility infrastructure, such as roads and railways.
7. **A CONSULTATIVE APPROACH**

7.1 The NPPF and the Code of Best Practice on Mobile Network Development require a consultative approach to network development and a process to reflect the sensitivities of any given site. In this case, the proposal received an amber score when assessed against the traffic light rating model (see Appendix C of the Code of Best Practice) and pre-application consultation was undertaken with North York Moors National Park. In our consultation letter we sought to agree with you the appropriate traffic light rating and associated consultation requirements, and obtain your comments on the siting and design of the development.

7.2 The pre-application consultation advice received has been considered very carefully and the siting and design of the development has been modified to incorporate the local planning authority’s comments, in so far as this practicable. The tree main issues raised were:

- **Could the mast be located approx. 30m to the north east of the proposed location** – No, unfortunately this is not possible as the land falls under separate ownership and this landowner has indicated that they would not be willing to accommodate any MIP installation.

- **Could a tree design be used** – No, see para 6.5 above

- **Can landscaping and planting be provided** – Yes – see para 6.13 above.

7.3 In accordance with the advice received traffic light rating score, pre-application consultation has been undertaken with the following people and organisations.

- Ward Councillor – no response thus far

- Parish Council – no specific response due to timings of meetings
• Historic England – no immediate concerns

7.4 In addition a red-flag trial was carried out prior to the submission of the application which allowed stakeholders to view the likely impacts from the mast. This involved a temporary pole being erected with a high visibility top section set at the height of the proposed mast (15m). This allowed views to be taken from a number of local vantage points and we hope has been a great help in allowing stakeholders to understand more the physical nature of the proposal.
8. ICNIRP COMPLIANCE

8.1 A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application. Accordingly, as explained within the NPPF, it is not necessary to consider further the health aspects and concerns about them, which include the perception of risk.
9. SUMMARY AND CONCLUSIONS

9.1 In summary, the application is in respect of electronic communications apparatus necessary as part of the Mobile Infrastructure Project, a Government initiative to eradicate not spot areas. The development will, therefore result, in mobile coverage being supplied by all four mobile network operators in an area completely without effective coverage from any one of them.

9.2 The consequence of this major improvement will be to bring the many considerable and varied benefits of high speed wireless communications and so end the ever widening digital divide that disadvantages the local area. This should widen economic opportunity and improve the social well being of the local population. The public interest of the development is, therefore, clear and examples of the many benefits associated include:

- Mobile communications can save lives by enabling immediate contact with the emergency services;
- Mobile communications can be used to summon assistance from the breakdown services in the secure environment of a locked car. This is particularly important to the vulnerable;
- Mobile communications can help facilitate modern forms of working, including greater homeworking. This can bring about an improved balance between home and working life and reduce travel;
- Mobile communications can help minimise unnecessary journeys, so increasing productivity and reducing travel demands;
- Mobile communications can help extend business opportunities into peripheral areas;
- Mobile communications can help local businesses and service providers such as tradesmen, doctors and vets to provide a more flexible and responsive service;
• Mobile communications can help local hotels and restaurants and other service providers the means to reach potential customers and vice versa and help facilitate valuable bookings and reservations;
• Mobile communications can bring about far greater personal convenience and security.

9.3 The development proposed is in the context of wider network needs associated with the different cellular systems operated by the Mobile Network Operators. These impose particular locational and siting requirements. The technical justification included within this supporting statement clearly demonstrates the need for this apparatus proposed within the context of the operators surrounding networks and the MIP improvements.

9.4 The development proposed has been brought forward in accordance with national and local planning policy and best practice guidance in the siting and design of its apparatus. This has included:

• Network planning based upon existing sites, including those controlled by Arqiva;
• In the absence of any suitable or available electronic communications site, as in this case, finding a suitable alternative location, brought forward in accordance with policy and best practice advice;
• Consultation in accordance with the Code of Best Practice procedures;
• An examination of design options to try and minimise potential visual impact having particular regard to the context of the site.

9.5 As a consequence the development is in accordance with the Development Plan and specific policies relating to telecommunications development. The sensitive siting and design of the development will minimise potential visual impact and avoid any harm to the beauty of the AONB/special qualities of the National Park. Insofar as the development will be visible that factor is outweighed by the need
for the development in the wider public interest and the special operational and technical considerations.

9.6 The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.

9.7 In summary, this statement has explained the importance of the Mobile Infrastructure Project and the consequential need for the development proposed. It has also demonstrated that the proposal is in accordance with the Development Plan and national policy set out in the NPPF. In particular it is a form of development specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.

9.8 In conclusion, the application merits support and there are no material considerations that indicate otherwise.