

Planning Statement
In Support of the Application
for an
Electronic Communications Base Station
Existing Arqiva Site
Arqiva Transmitting Station, The Howe, Danby Low Moor,
Castleton, North Yorkshire YO21 2NF

Site Reference 188035

CTIL & EE



Arqiva Ltd

1. INTRODUCTION

1.1 This statement is submitted in support of an application for planning permission and includes:

- A description of the site and surrounding area
- A description of the proposal
- A statement of community engagement
- A review of planning policy considerations
- A review of design and access considerations

1.2 A number of other accompanying documents have been submitted in support of the application and these are referred to.

NYMADA
03 APR 2017

2. DESCRIPTION OF THE SITE AND SURROUNDING AREA

2.1 The proposed site is about 15 miles south-east of Middlesbrough, to the east of Castleton, the north west of Fryup and the south west of Ainthope and Danby. Ainthope Lane is to the north east, Howe Bank and Church Street to the north, Ashfield Road is to the west and Wandels Lane to the south. The site is surrounded mostly by farm land and some residential properties. The centre of the village is approximately 750m to the north east.

The site is located at one of the highest points of the hill at The Howe, Danby Low Moor. The existing monopole structure has a height of 15m and cannot be seen from the adjoining roads on the east, south or west. Only from the centre of the village can the existing installation be seen. There have been no community objections for this site that we have identified so by changing the type of structure and increasing the height by 2.5m is not believed to have a severe visual impact.

2.2 NYM/2016/0626/TN- on the 17/10/2016, EE and Hutchison 3G added two ground based equipment cabinets to the Arqiva Transmitting Station. No other relevant planning applications have been submitted relevant to this location.

NYM/2016/0626/TN-
03.03.2017

3. DESCRIPTION OF THE PROPOSAL

3.1 The development proposed is shown in detail in the drawings submitted and is for an electronic communications base station. The principal elements of this beneficial proposal are as follows:

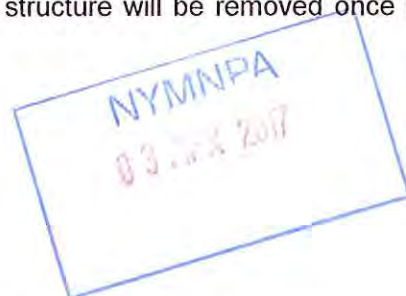
- Replacement of the 15 metre existing mast with a new shared radio mast at 17.5 metres high of lattice construction to be newly used by CTIL and the continued use by EE.
- The proposal consists of the installation of:

CTIL – 3 x Kathrein Antennas at 17.5m mean, 1 x SHF 0.6m transmission dish, 3 x RRU's to be mounted to the rear of the Antennas on the new structure. 1 x Meter cabinet, 1 x TSC cabinet and 1 no RBS 6102 cabinet all located at ground level on the proposed tower base.

EE – 2 x OMNI Antennas to be removed and replaced with 6 x Commscope Antennas at 13m mean on the new structure. 1 x 0.3m transmission dish to be relocated onto new structure at 3.3m mean. 1 x 0.6m transmission dish to be installed at 3m mean. 1x Furo outdoor cabinet, 2 x BTS3900A outdoor cabinets & 1 x Link AC outdoor cabinet to be installed on proposed tower base.

Arqiva – DSO UKH 4L Unshrouded Cardioid Antenna at 18.2m to be relocated onto new structure. DSO UHF Log Periodic Antenna at 10m to be relocated onto new structure.

- The installation of cabling and associated development.
- For the avoidance of doubt the existing structure will be removed once the new tower is operational.





- 3.2 As necessary, any uncontaminated earth and materials excavated will be reused for fill and levelling.
- 3.3 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.

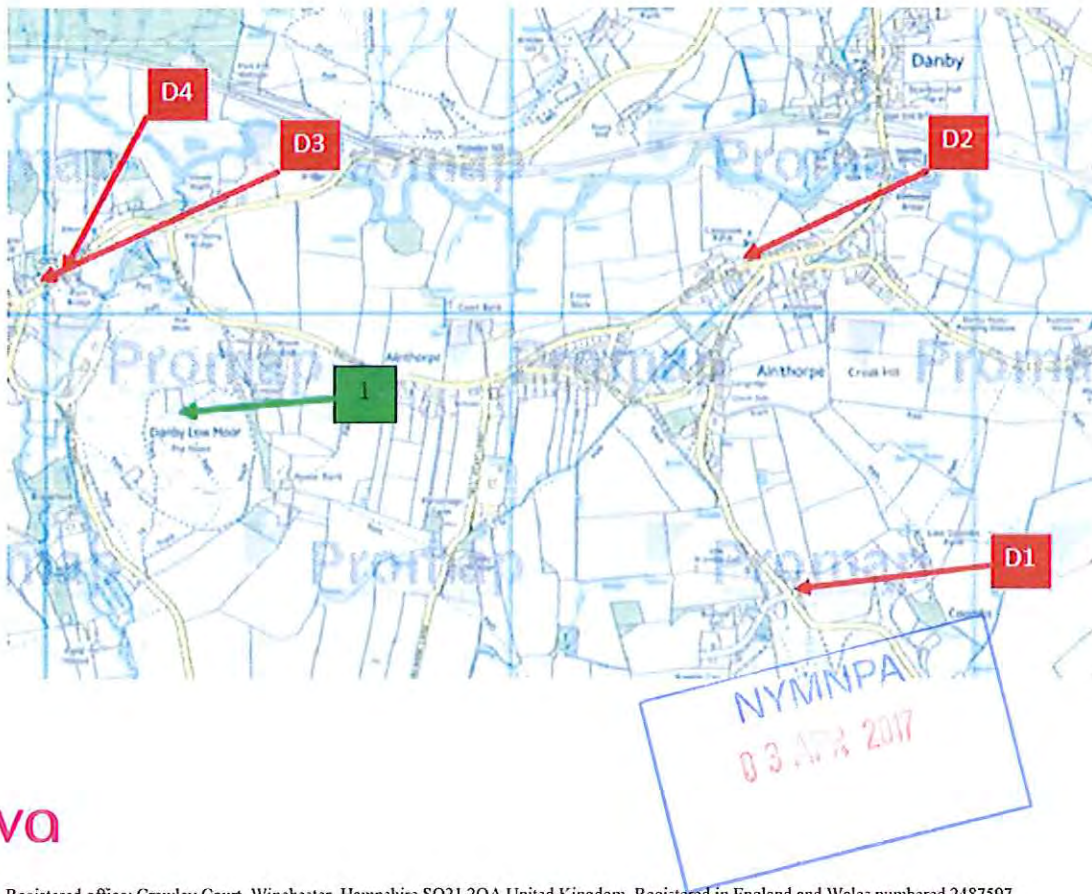
The Operators Network Requirements

- 3.4 Telefónica UK Limited has entered an agreement with Vodafone Limited pursuant to which the two companies plan to jointly operate and manage a single network grid across the UK. These arrangements will be overseen by Cornerstone Telecommunications Infrastructure Ltd (CTIL) which is a joint venture company owned by Telefónica UK Limited and Vodafone Limited.
- 3.5 This agreement allows both organisations to:
- Pool their basic network infrastructure while running two, independent, nationwide networks
 - Maximise opportunities to consolidate the number of base stations
 - Significantly reduce the environmental impact of network development
 - Aligns with longstanding national planning policy to minimise the proliferation of new communications infrastructure through sharing
- 3.6 Section 6 of the Code of Best Practice on Mobile Network Development in England, published in June 2016, explains how mobile networks operate. In the annual network rollout information supplied, Vodafone, Telefónica & EE will have explained its network requirements and the anticipated use of existing sites, including those owned by radio site management companies like Arqiva.
- 3.7 Although the operators' networks are mature, improvements, upgrades and new sites are required for their networks for a number of reasons. For example, to increase capacity in an area of high demand, to provide new or improved network

coverage in terms of quality as well as extent, or perhaps to provide coverage over a new development area such as a new housing estate or industrial park.

3.8 In this case, Vodafone, Telefónica & EE have identified a need to develop a replacement mast at this site to provide network improvements as explained in more detail in the accompanying document Supporting Operational and Technical Justification. There is a specific need to provide 4G coverage and additional capacity to its 2G and 3G networks in accordance with its Ofcom network obligations. EE have at the same time planned to upgrade and replace their equipment at the site as part of their continued coverage to the area. Please refer to the drawings for more detail on this.

3.9 The application site has been selected by EE, Vodafone and Telefónica as this will provide the required level of network coverage while properly meeting national town planning policy objectives for the shared use of existing telecommunications masts and sites, in this case owned / operated by Arqiva. Alternative options were explored and discounted as follows:



Site ³	Site Name and address	NGR	Reason for not choosing ⁴	Option
GF - Greenfield	Name	Tennis Courts	T - Technical Difficulties Site is too far away from the target area and would require a substantial mast to reach the intended target area.	D1
	Line 1	39 Brick Lane		
	Line 2			
	Town	Whitby		
	County	North Yorkshire		
	Postcode	YO21		
ES - Existing Structure	Name	Fire Station	P - Planning Located within the village of Danby and any location here would likely draw negative feedback from the local community and National Park. Discounted on this basis.	D2
	Line 1	30 Ainthorpe Lane		
	Line 2			
	Town	Whitby		
	County	North Yorkshire		
	Postcode	YO21		
GF - Greenfield	Name	BT	P - Planning Located within the village of Castleton and likely to receive a large amount of negative feedback. Unlikely to obtain planning permission.	D3
	Line 1	Castle Close		
	Line 2			
	Town	Whitby		
	County	North Yorkshire		
	Postcode	YO21		
ES - Existing Structure	Name	St Michaels Church	P - Planning A substantial tower would be required to clear the surrounding trees around the church. Likely to be refused at planning.	D4
	Line 1	23 Church Street		
	Line 2	Castletown		
	Town	Whitby		
	County	North Yorkshire		
	Postcode	YO21		



4. STATEMENT OF COMMUNITY ENGAGEMENT

- 4.1 The National Planning Policy Framework (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 Amber score when assessed against the traffic light rating model (see Appendix B of the Code of Best Practice) and pre-application consultation was undertaken with you on 07/12/2016. 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.
- 4.2 The pre-application consultation advice received has been considered very carefully and it was noted that the feedback to the proposal was positive. The following consultation was carried out:

North Yorks Moors National Park Authority –



Consulted 12/10/2016.

Response received 07/12/2016:

"I have now had the opportunity to look at the details of your proposal, in relation to what is on site already. I would advise you that the proposed installation of a 17.5m high lattice tower in place of the existing timber pole is likely to be considered acceptable, but I would suggest that it should be mid-grey colour to reduce its impact on the sky-line. I trust that the above advice is of assistance, but if you have any further queries, please don't hesitate to contact me again at the above address."

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

Councillor Clive Pearson-

Danby Parish Council-

- Danby Group Parish Council response:

"I hope you will be pleased to learn that unless there are some drastic last minute changes to the plans, the Parish Council will wholeheartedly be in support of the proposed development in anticipation that some of the problems with mobile telecommunications in the area will be solved."

Natural England-

Following response received:

"In addition, Natural England is satisfied that the proposed development being carried out in strict accordance with the details of the application, as submitted, will not damage or destroy the interest features for which the North York Moors SSSI has been notified. We therefore advise your authority that this SSSI does not represent a constraint in determining this application. Should the details off this application change, Natural England draws your attention to Section 28(I) of the

NYMNOA
03.12.2016

NYMINDA
03.03.2018

Wildlife and Countryside Act 1981 (as amended), requiring your authority to re-consult Natural England.”

No other responses were received from any other stakeholders or parties.

5. PLANNING POLICY CONSIDERATIONS

5.1 The relevant planning policy and best practice framework is found principally within:

- The local policy framework set out in the adopted Development Plan;
- National Planning Policy Framework (NPPF);
- The Code of Best Practice on Mobile Network Development in England;
- The Joint Accord between the mobile network operators and the Association of National Park Authorities and the National Association of Areas of Outstanding Natural Beauty;

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. As planning authority, you will be familiar with this framework and so in the interests of brevity, we do not rehearse it back to you in detail, but address instead the principal themes to demonstrate that the application accords with them.

National Support for Modern Communications

5.3 The policy support for high quality communications infrastructure and systems, exists because they are essential for sustainable economic growth and the NPPF applies a clear presumption in favour of sustainable development. The need for high quality mobile services in rural areas, including in designated areas is now well

recognised. Indeed, the poor quality coverage and lesser standard of services still prevalent in many such areas is seen by most local communities as a major issue. The accompanying document the Benefits of Mobile Connectivity explain the major contribution towards sustainability and help illustrate why.

- 5.4 In the accompanying document, the Supporting Operational and Technical Justification, the way in which mobile networks operate is explained, including the constraint imposed by the mobile devices, which must be able to communicate with the base stations. Cell areas are now much smaller than with earlier systems. This means greater limitations on siting within designated areas, which are very widely drawn. Although in many areas mast height requirements have reduced over successive mobile generations, the difficult topography often found in designated areas, means this benefit is unfortunately muted.

The Need to Protect the Special Qualities of Designated Areas

- 5.5 The special operational and technical factors that require specific siting of base stations should be balanced by the need to minimise environmental and visual impact, and the special qualities of nationally important landscapes such as National Parks and Areas of Outstanding Natural Beauty.
- 5.6 However, paragraphs 3.2 – 3.3 of the Code of Best Practice explain that there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs, the Code of Best Practice emphasises that the NPPF now applies a reduced policy test compared to previous guidance. This helps clarify that an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.

NVMNPA
03/03/2017



- 5.7 In balancing these requirements, the starting point for planning new networks or the expansion of existing networks is to use existing electronic communications sites owned by other operators or radio site management companies, such as Arqiva. This policy objective is backed with the statutory obligation placed upon operators to share apparatus, where practicable out under General Condition 3 (4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.
- 5.8 Although a replacement structure is required in this instance, as the existing mast is structurally incapable of supporting more radio apparatus at the height required, it will be at an existing site owned or managed by Arqiva which is in operational use and where a mast is already an established feature of the site and wider landscape.
- 5.9 Although the mast proposed is not major development, it is relevant that it nonetheless satisfies the criteria that apply to such greater development under paragraph 116 of the NPPF. This 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. Having regard to the three criteria listed:
- The base station is required as part of a national mobile communications network, necessary to extend and improve mobile connectivity to the local area;
 - As explained, the target coverage area falls within the designated area and the special operational and technical requirements necessitate siting a mast within it;
 - All reasonable steps have been taken, through careful siting at an existing Arqiva communications site, to moderate the visual impact of the development, having regard to technical and operational factors. In this case, the replacement and upgrading of an existing mast and equipment now an established and accepted feature within the landscape;

- The proposal to share this existing communication site by CTIL and EE, through the installation of a replacement mast, looks to strike the optimum solution, particularly when compared with the alternative of erecting a new base station and the development of an associated compound on a site nearby and with it the associated additional resources in developing a new site within the designated area.

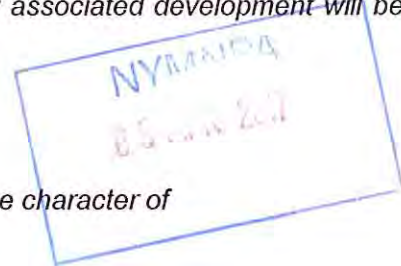
5.10 As a matter of principle, the development proposed is in accordance with the relevant policy framework and should be therefore be acceptable. In the next section, the Design Considerations are reviewed to demonstrate that the detail of the development is also acceptable and that in accordance with the presumption in favour, planning permission should be granted.

Local Policy Considerations

5.11 At local level, the proposal has been considered against The Core Strategy and Development Policies (2008) sets out the policies which guide where new development will take place in the National Park and to determine planning applications. The main area of focus on the Core Strategy and Development Policies, is Development Policy 25- Telecommunications.

“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 erection 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.*

The development complies fully with this policy. In respect of each criteria we note the following:

1. As per the discounted options above the only means of fully targeting the coverage area is the replacement of the existing mast.
2. The structure size and height has been designed to the lowest available specification whilst ensuring the mast is structurally capable of accommodating the equipment and providing the required coverage.
3. As per the above this option was seen as the least visually obtrusive in a sensitive area
4. Given that mast sharing will be in effect this is a long term solution for all operators and complies with local and national policy.
5. A condition to the decision can be attached detailing this.

5.12 The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operators and minimising environmental impact whilst complying with local policy



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 consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations. Due regard has been given to the factors listed in Appendix A of the Code of Best Practice.

Physical Context

6.2 The site has been chosen as it negates the need for finding a new site that could disturb the natural look of the landscape with a large structure. The height at the top of the hill ensures that coverage will be at its maximum range to the many users currently experiencing problems with their 2G/3G/4G and voice calls. The lattice design is considered the optimum design for this location as long distance observers can look through the permeable structure allowing it blend in with the surrounding landscape.

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 coverage to the local area, having regard to the need to minimise visual impact, already referred to above explained in detail in the Supporting Operational and Technical Justification. With regard to the main component elements of the development proposed:

Mast design

- The design of the proposed mast is led by operational and technical factors, although the choice of mast design does reflect insofar as practicable observations made during the pre –consultation process. Whilst the lattice



structure proposed will be evident from any near views, the latticework will help ameliorate presence over distance, especially from views where there is a background or foreground of vegetation.

- 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. Compared to other forms of vertical infrastructure also found in designated areas 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.
- 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 around 5 metres. In this location, such a structure would be more prominent and incongruous in the wider landscape.

Antenna Array

- The numbers of antennas and dishes and their size has been kept to the minimum necessary to provide coverage for both CTIL and EE and to link this site back into the operator's network. The design of these features is very much driven by operational and technical factors.

Equipment Cabinets

- The number of radio equipment cabinets and their size has been limited to what is required to meet the operator's current and foreseeable network requirements. The location and design of the equipment cabinets, and the electronic communications equipment housed within them, reflects their functionality and 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

- 6.4 Access to the site will be provided from the existing access track from the unnamed road off Howe Bank.
- 6.5 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.
- 6.6 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

- 6.7 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.
- 6.8 At ground level, the compound will be set amongst existing natural screening that will minimise its visual impact. For this reason, additional landscaping is not considered appropriate and has not been included within the scheme.

Appearance

- 6.9 The sensitive approach to siting and design should minimise the appearance of the development proposed. In addition, as indicated above 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. SUMMARY AND CONCLUSIONS

- 7.1. In summary, the application is in respect of electronic communications base station necessary to improve a vital network that provides public services.
- 7.2. The service provided by the operator's is in the public interest and is in very high demand. In the UK there are now more than 91 million subscriptions to mobile networks and mobile services now exceed fixed landlines in terms of customer numbers and usage.
- 7.3. The public interest of the system is clear from the considerable benefits that will flow and it makes a significant and major contribution towards sustainable objectives.
- 7.4. The operator's requirement is in the context of network needs associated with a cellular system. These impose particular locational and siting requirements. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.
- 7.5. The operator(s) has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to protect the special qualities of designated areas. This has included:
 - Network planning based upon existing sites, including those controlled by Radio Site Management companies like Arqiva.
 - Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
 - Consultation in accordance with the Code of Best Practice procedures.
 - An examination of design options to try and minimise potential visual impact.





- The replacement of an existing radio mast, compared with the alternative of erecting a new mast and the development of an associated compound on a site nearby and with it the associated additional resources in developing a new site within the designated area.
- 7.6. 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.
- 7.7. This statement and the other accompanying material has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in the NPPF. In particular it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.
- 7.8. In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one which the presumption in favour of granting approval applies.

AMMUNITION
03.04.2017