

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name	North Side Forestry Commission 2	Site Address	North Side Forestry Commission 2, Langdale End, Scarborough, North Yorkshire YO13 0BW
NGR	E:492538, N:492669		
Site Ref Number	EAS 1021B	Site Type ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

(would not generally apply to upgrades/alterations to existing sites)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why: The Ofcom database was used to search for existing sites in the area which is the most up to date source of information.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: N/A		

Annual Area Wide information to local planning authority

Date of information submission to local planning authority	The Home office met with North York Moors NPA.
Name of Contact	Mark Hill
Summary of any issues raised:	This installation forms part a new roll out of the Home Office (HO) led Emergency Services Network (ESN). The local planning authority are receptive to the programme and its aims and seek to be involved.

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	27/7/2017
Was there pre-application contact:	Yes No
Date of pre-application contact:	16/8/2017
Name of contact:	Mark Hill
Summary of outcome/Main issues raised: <ul style="list-style-type: none"> • The site is well selected; • A dark grey colour is preferred. 	

¹ Macro or micro

NYMNPA 28/03/2018

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline Consultation carried out: The local planning authority indicated at pre-application stage that the community has been well briefed regarding the EAS and no further pre-application community engagement is required.			
Summary of outcome/Main issues raised: Not applicable			

School/College

Location of site in relation to school/college: No schools in close proximity.
Outline of consultation carried out with school/college: N/A
Summary of outcome/Main issues raised: N/A

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed	Yes	No
Date served:	28/3/2018	

3. Proposed Development

The proposed site:
<p>Background</p> <p>The Emergency Services Mobile Communications Programme (ESMCP) is the Home Office led programme responsible for replacing Airwave. It aims to provide an integrated voice and broadband data communications service for the Emergency Services (3ES: Police, Fire & Rescue and Ambulance Services). This Emergency Services Network (ESN) has initially been deployed by enhancing an existing commercial network configured to give the 3ES priority over other users. This proposal, as a component of the ESN, is for the Extended Area Services (EAS) which is to provide additional infrastructure to extend the ESN into primarily remote and commercially unviable areas where little or</p>

no mobile network coverage exists.

Description of the Site

The site is located within forested area to the north west of the village of Langdale End. Birch Hall Scout Campsite is located to the south east of the site off the same access road. It is a remote rural area. The site is accessed from a gated forestry track.

Proposed Development

The proposals relate to the installation of a 30m lattice mast on a concrete base with 3 no. pole mounted antennas, 2 no. 0.6m transmission dishes, 1 no. 1.2m satellite dish, ground based foul weather enclosure, a generator and meter cabinet within a 2.4m close boarded fenced compound and ancillary development thereto.

Type of Structure: Lattice Mast

Overall Height:	31.3m
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Equipment Housing:

X1 Foul Weather Enclosure Width x Depth x Height:	2.7m x 2.5m x 2.5m
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X1 Meter Cabinet Width x Depth x Height:	1.2m x 0.7m x 1.3m
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X1 Generator Width x Depth x Height:	2.2m x 1m x 1.2m
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Materials:

Column/mast etc. – type of material and external colour:	Dark Grey
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Equipment housing –external colour:	Green RAL 6009
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Reasons for choice of design:

The new installation is required for the Extended Area Service to extend the new Emergency Services network site. It is the minimalist solution available provide the necessary coverage whilst proposing a design to minimise the impact of the development on the environment.

The lattice mast design is chosen as the open lattice design is considered appropriate in rural areas particularly in this forested location providing views through the open structure rather than a solid pole. Further, a lattice structure can be easily shared in the future and is a climbable structure and does not rely upon a cherry picker being utilised for repair to the antennas which is particularly important for the Emergency services Network to ensure that repairs are not delayed.

It is considered that the appearance of the mast and equipment cabinets would not seriously impact on the visual amenity of the area; the site has been carefully chosen as less sensitive than others to meet the coverage requirements in this cell area. It is set back from the road and is well screened at the lower level by the forested area. It will be possible to see the headframe of the mast above the trees but this is unlikely to be detrimental to the area set within a forested area.

It is therefore considered that the proposal strikes a good balance between environmental impact and operational considerations to provide the technology for EAS.

4. Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)*	Yes
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International Commission on Non-Ionizing Radiation Protection Declaration attached	
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International Commission on Non-Ionizing Radiation Protection public compliance is	
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determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.

When determining compliance, the emissions from all mobile phone network operators on or near the site are considered.

In order to minimise interference within its own network and with other radio networks, the EAS operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.

As part of the EAS network, the radio base station that is the subject of this application will be configured to operate in this way.

All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, which is responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.

The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.

5. Technical Justification

Enclose predictive coverage plots if appropriate e.g. to show coverage improvement.

Reason(s) why site required e.g. coverage, upgrade, capacity:

The National Planning Policy Framework clearly states that authorities should not question the need for the service. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site, given its intended use for the Emergency Services.

A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. In certain areas, however, there will be gaps between these cells, resulting in a loss of coverage which can be due to topography or buildings which block the path of the signal.

This component of the ESN is the Extended Area Services (EAS) which is to provide additional infrastructure to extend the ESN into primarily remote and commercially unviable areas where little or no mobile network operator coverage exists. These are referred to as 'not spots'.

The Technical Justification document submitted in support of the application shows the existing gap in coverage to the Minor Roads (as defined by the ESN) of the North Yorkshire Moors National Park in the area of Langdale End, Bickley and to Crosscliff along the B6255 (classed as a major road for the ESN) along with the predicted coverage with the proposed installation.

This proposal forms part of a programme which will provide the emergency services with nationwide 4G voice and data services and forms part of the nation's Critical National Infrastructure.

The new 4G network which this proposal forms part of, will significantly improve the efficiency of the Emergency Services by giving them access to the latest type of data and applications for example the

ability for an ambulance crew to send vital patient data on to the hospital to allow staff to make the best preparations in advance of a patient's arrival for example.

6. Site Selection Process – alternative sites considered and not chosen

The proposed siting of the mast was decided upon after analysing the requirements to provide the EAS in this rural area. Several potential options (listed below) were investigated by a surveyor, radio engineer, town planner and site providers. To ensure the efficient operation of the network, alternative sites must be within a short radius of the cell search area. Sites should be at relatively high points to ensure the antennas can transmit and receive over the proposed cell area. Furthermore, placing sites on high points enables the overall mast height to be minimised. Sites also had to have the following characteristics:

- They must be environmentally suitable i.e. where any inevitable and associated impacts are 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.

During the site search stage, alternate options were investigated; these are listed below. Site providers (owners) of each site were asked for an expression of interest, in principle, to hosting the proposed development if considered technically feasible. Listed below in the table a National Grid Reference for each site and the reasons why the alternate sites were assessed as being unsuitable and/or unavailable.

Paragraph 43 of the NPPF states that LPAs should aim to keep the number of radio and telecommunications masts sites to a minimum consistent with the efficient operation of the network.

The document states that existing masts, buildings and other structures should be used, unless the need for a new site has been justified. During the alternative sites assessment, there were no suitable structures or masts identified which would can provide both the required transmission links and the level of coverage required in this instance.

The methodology employed in the site search process in accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF) is as follows:

- a) Mast and Site Sharing
- b) Existing Buildings/Structures
- c) Ground Based installations

Site	Site Name and address	National Grid Reference	Reason for not choosing
D1	Birch Hall Cottage	E:492717 N:492567	We were unable to make contact with the site provider.

Additional relevant information (planning policy and material considerations)

National Planning Policy Framework (March 2012)

The governments National Planning Policy Framework (NPPF) was published on 27 March 2012. The Government's latest thinking strongly supports communications infrastructure. Paragraph 42 of the

framework document sets out the objectives of the Communications Infrastructure. It states that *'advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services'*.

Paragraph 43 states that *'Local Planning Authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband'*. It goes on to acknowledge that the numbers of radio and telecommunications masts and the sites for such installations should be kept to the minimum consistent with the efficient operation of the network. Paragraph 44 indicates that local planning authorities should not impose a ban on new telecommunications development.

NPPF paragraph 46 sets out a clear message to local planning authorities on health issues and the need for telecommunications systems. It states that *'local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure'*.

Throughout the NPPF there is strong support for sustainable development which is summed up in paragraph 14 which states *'At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be a golden thread running through both plan making and decision taking.*

Paragraph 115 states that *"Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads."*

Code of Best Practice on Mobile Phone Network Development in England (November 2016)

The Code of Best Practice provides guidance primarily to mobile network operators, their agents and contractors and to local planning authorities in England.

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure is achieved in a timely manner, but in a way that also minimises the potential impact that can be associated with such development. It provides clear and practical advice to ensure the delivery of significantly better and more effective communication and consultation between operators, local authorities and residents.

The Code highlights that the mobile telecommunications network is a key element of national infrastructure in both economic and social terms and a crucial component of everyday life. It states that *"coverage in rural area is recognised as a vital component for maintaining economic activity and social inclusion"*. It acknowledges that the pressure on networks to upgrade and improve networks through changes to existing sites and the development of new sites is constant. With the ever-increasing demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity.

Concerning the erection of new ground based masts; The Code provides examples of where the environmental and visual impact of the mast can be greatly reduced.

- *Placing the mast near similar structures. For example, industrial and commercial premises, road signs and lamp posts;*
- *Placing a mast within or adjacent to an existing group of trees*
- *Using simple and unfussy designs. Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts; and*

- *Appropriate colouring. Masts seen against the sky, for example, are best left in their galvanised state or painted pale grey. Against a wooded backdrop a matt green or brown colour scheme would be more applicable.*

It acknowledges that Operators should bear in mind that there are certain locations where sensitive siting and design are of increased importance. These include National Parks; AONBs and Sites of Special Scientific Interest. It states that in these areas, attention will need to be paid to the nature of the proposals, the significance of the location, the impact that the proposals could have and the need to reduce any adverse impact. It goes on that operators may sometimes be able to avoid a specific site (e.g. a Listed Building) but not an entire protected area (e.g. a National Park) in which case they should seek to minimise the impact through sensitive design and appropriate siting of the proposals.

Regarding telecommunications in rural areas the Code indicates that the conservation of wildlife and cultural heritage are important considerations in all protected areas, and should be given great weight in National Parks whilst acknowledging that those who represent rural areas recognise that a modern telecommunications infrastructure network is vital for a modern economy and society, and is particularly important in preventing a rural/urban digital divide; while operators recognise the need to respect the environment, particularly in sensitive areas such as National Parks and in siting development in rural areas, operators will take these principles into account

A Joint Accord has been agreed between National Parks England and the Mobile Network Operators to complement this Code of Best Practice. The Accord aims to: help communities living in National Parks to benefit from consistent high-quality connectivity; protect the special qualities of the National Parks by minimising any adverse environmental impacts; and to support close working between operators and National Park Authorities to achieve these aims.

Local Policy

North York Moors National Park Authority, Core Strategy and Development Policies (2008)

The North York Moors National Park Authority, Core Strategy and Development Policies (2008) was adopted on 13th November 2008. The relevant policy for telecommunications development is Policy DP 25:

It states:

“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 supporting text to the policy acknowledges that *“good telecommunications are an increasingly important part of modern life. Government guidance clearly advocates that local authorities, including National Parks, should respond positively to telecommunications development proposals, whilst taking account of the need to protect the best and most sensitive environments. On this basis, the Authority seeks to help local communities to access communications technology but to also ensure that this is not at the expense of the environment of the Park. The development of the internet and broadband*

technologies provide opportunities to offset the physical transport challenges of the Park through the potential for working from home and internet shopping. However, the installations required can cause visual harm to the landscape and built environment if insensitively located. Operators will therefore be expected to show what consideration has been given to reducing such impacts through mechanisms such as mast sharing, the erection of antennae on existing structures (including electricity pylons) and the use of existing features, such as buildings or trees, for screening.”

Compliance with Planning Policy

The NPPF clearly highlights the government’s positive stance regarding telecommunications and broadband development and notes the environmental and social benefits telecommunications can provide.

The proposed telecommunications installation fully complies with the objectives of the NPPF. The proposal complies with Local Policy whereby the proposal has been designed to minimise the effect on the area whilst contributing to essential infrastructure improvements for a new telecommunications site for use by the Emergency Services as part of the EAS network. This has been accepted by the planning officer during pre-application discussions where he confirmed that after visiting the site he considers:

“that the site is well chosen and is likely to receive planning permission if applied for. It is likely that there would be a strong preference for the mast and aerials to be coloured a dark grey colour to maximise the screening effect when viewed from elevated mid and long-distance viewpoints.”

In response to this comment the mast is to be coloured dark grey which will help to absorb and assimilate the proposal within the environment. The overall height of the structure is 31.3m to ‘see’ above the existing environment in the immediate area, which would cause unacceptable interference if the pole was any lower in height.

In accordance with the NPPF and North York Moors NPA policies, care was taken with regards to the design of the proposed structure. The NPPF states at paragraph 43 that local planning authorities should support the expansion of electronic communications networks, including telecommunications and high-speed broadband. It acknowledges that high quality communications infrastructure is essential for sustainable economic growth. The NPPF also highlights that the development of high speed broadband technology also plays a vital role in enhancing the provision of local community facilities and services. As has been discussed the proposal has been sited and designed to minimise any adverse effect upon the National Park.

Taking all these factors into consideration, it is our opinion that the proposal meets all local policy requirements of the North York Moors NPA policy and national policy as set out in the NPPF.

Summary

Taking into consideration all the relevant factors set out above, it is considered that this proposal is the optimum solution in terms of providing the required technology coverage for the EAS for the emergency services, minimising any adverse impacts on local amenity and the National Park.

To summarise the case in favour of the proposal the following points are of relevance:

- With specific regard to telecommunications development, the proposal is fully compliant with the NPPF [par 14, 17, 43, 46, 56, 65] 115, 116 Code of Best Practise on Mobile Phone Development, and local policy.
- Site selection was progressed in accordance with the applicant’s licence obligations, advice in NPPF and the Code of Best Practice and represents the least environmentally intrusive, technically suitable, available option;

- The operator's site selection strategy is to keep the overall environmental impact to a minimum where the operator will choose a site with the least impact upon the character of the area whilst still being technically feasible in terms of providing signal coverage for the essential infrastructure improvement;
- In this instance, this site is considered to have the least impact upon the character of the local area, bearing in mind the site restrictions the operator is working under and other possible locations.
- This is now the only site option open to my client and this restriction is a material consideration in the determination of the planning application.

The height of the proposed mast (at 31.3 metres to the top) is the absolute operational minimum to clear the immediate environment and provide adequate, coverage and capacity for the operator.

Contact Details

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Signed	_____	Date	28/3/2018
Position	Planning Consultant	Company (on behalf of the above operator)	Entrust UK Ltd