SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Grouse Hill Caravan Park	Site Address:	Land at Grouse Hill Caravan Park,
NGR:	E: 492960 N: 500428		Blacksmith Hill, Whitby, North Yorkshire, YO22 4QH
Site Ref Number:	17071/6848/na	Site Type:1	Macro

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Site Selection

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Was an LPA mast register used to check for suitable sites by the operator or the LPA?	No	
If no explain why:		
The existing Vodafone site has been chosen to be upgraded, following proconsultation with the LPA	e-applicatio	on
Was the industry site database checked for suitable sites by the operator:	No	
If no explain why:		
As above		

Annual roll out consultation with LPA

Date of last annual rollout	19 October 2010
information/submission:	
Name of Contact:	Head of Planning
Summary of outcome/Main issues raised:	None known
*	

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	31 March 2011
Was there pre-application contact:	Yes
Date of pre-application contact:	6 April 2011
Name of contact:	Mrs Hilary Saunders

¹ Macro or Micro



Summary of outcome/Main issues raised:

The LPA officer made the following comments in her email reply of 6 April:

"I have studied the attached plans and would advise you that in my opinion, the proposed upgrade to the mast would not be visually intrusive in the immediate or wider landscape and therefore would not be detrimental to the character of the area. In view of this an application for the proposal outlined would be likely to receive favourable consideration.

You have noted others that you have consulted at this stage, and this would seem to be appropriate at this stage. I am unable to suggest who else you might consult."

No contrary comments were made by the officer in relation to the proposed traffic light rating of Green.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green
Rating of Site under Traine Light Woder.	Olocii

Outline Consultation carried out:

Consultation letters were sent to the following on 8 March 2011, as agreed appropriate with the LPA officer.

- Cllr Jane Mortimer and Cllr Helen Swiers, as local Ward Councillors for the Fylingdales District Ward;
- Mr Patrick Newton, Clerk to Fylingdales Parish Council;
- Mr Robert Goodwill, MP

Summary of outcome/Main issues raised:

No responses received to date

School/College

Location of site in relation to school/college:

There are no schools/colleges within 250 metres of the application site.

Outline of consultation carried out with school/college:

N/A

Summary of outcome/Main issues raised:

N/A

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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?	No
Has the Civil Aviation Authority/Secretary of State for	No
Defence/Aerodrome Operator been notified?	
Details of response:	
N/A	

Developer's Notice

Copy of Developer's Notice enclosed?	NYMNIDA	Yes
Date served:	1	11 April 2011
3. Proposed Development	1 5 APR 2011	

The proposed site:

Vodafone has an existing operational radio base station located at the application site at Grouse Hill Caravan Park, Blacksmith Hill, Whitby. The immediate area is a mix of predominantly open moorland and rural farm land, together with the caravan park site at Grouse Hill where the site is actually housed. Generally, and in the wider context, the area is within the boundaries of the North York Moors National Park.

The existing Vodafone site comprises a slim-line lattice tower with 2no 2G antennas at the top of the tower to a height of 15.75m to the top of the antennas, together with associated equipment housed inside a self contained ground based equipment cabin.

The proposed development is required to upgrade the existing Vodafone installation to enable Vodafone to provide enhanced 2G/3G services to the surrounding locality.

The development itself comprises removing the 2no existing 2G antennas and replacing these with 2no dual band 2G/3G antennas located in similar positions at the top of the slim-line lattice tower, with no overall increase in the height to the top of the new antennas at 15.75m. In addition, Vodafone will install 1no equipment cabinet and ancillary development thereto, with the additional cabinet being housed within the existing equipment cabin. As such, and as noted in the opinion of the LPA officer, the proposed development would not be visually intrusive in the immediate or wider landscape and therefore would not be detrimental to the character of the area.

Enclose map showing the cell centre:

Attached with the application are 3G coverage plots showing the cell centre, and Vodafone's existing and proposed 3G coverage. The first coverage plot shows there is presently no 3G coverage, as the existing site provides 2G coverage only. The second coverage plot shows that the minimal and non-intrusive equipment changes required to facilitate the proposed development will provide a significant level of 3G coverage to the local area. This proposed 3G coverage will allow Vodafone's customers to access High Speed Data levels on portable mobile equipment, in line with Vodafone's license obligations.

Type of Structure:

Description:

The existing Vodafone site comprises a slim-line lattice tower with 2no 2G antennas at the top of the tower to a height of 15.75m to the top of the antennas, together with associated equipment housed inside a self contained ground based equipment cabin.

The development itself comprises removing the 2no existing 2G antennas and replacing these with 2no dual band 2G/3G antennas located in similar positions at the top of the slimline lattice tower, with no overall increase in the height to the top of the new antennas at 15.75m. In addition, Vodafone will install 1no equipment cabinet and ancillary development thereto, with the additional cabinet being housed within the existing equipment cabin.

As such, changes to the existing structure and associated equipment will be nominal and can be achieved without any visual detriment to the immediate or wider landscape and the character of the area.

15.75 metres
15.75 metres

Equipment Housing:

Existing Vodafone Outdoor Equipment Cabin. The proposed new cabinet will be installed inside the existing outdoor equipment cabin. The dimensions of the proposed additional cabinet are set out below but for the avoidance of doubt this equipment will be internal.

Length:		0.600 Metres
Width:		0.600 Metres
Height:		1.650 Metres
Tower/mast etc – type of material and external colour:	As existing	
Equipment housing – type of material and external colour:	As existing	NP

Reasons for choice of design:

Given the make up of the area within the National Park, the obvious lack of alternative sites and the equally obvious suitability of the application site, it is considered upgrading the existing site is clearly the best option in terms of siting.

The design itself has been kept as simple as possible with a straight swap out of 2no 2G only antennas, which are being replaced by 2no 2G/3G antennas of similar size and appearance. The smallest antennas available have been selected so as not to increase the overall height of the structure, and so that the existing appearance of the site is maintained. The proposed equipment cabinet will be installed internally and will not be visible.

In light of Vodafone's efforts to design the best solution for this particular site so as to minimise the impact of the development on the National Park, the appearance of the antennas and the associated equipment installation has been designed to be as small as possible so that the proposals would not seriously impact on the visual amenity of the area, nor would it form an obtrusive feature within the immediate or wider landscape.

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In summary, the appearance of the proposal takes a form which is sympathetic within the context of its immediate environment and having regard to the prevailing status of the existing radio base station site. Using existing structures and deploying simple and unfussy designs is acknowledged in the Code of Best Practice on Mobile Network Development to be less likely to dominate and be in discord with the landscape and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area. This design is considered to be an appropriate solution and shows the applicants efforts to help mitigate the proposals impact on the visual amenity, whilst also ensuring that proliferation of masts are reduced by the sharing of existing structures as outlined within PPG8

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical coverage requirements for the site.

4. Technical Information

ICNIRP Declaration attached	Yes	
ICNIRP public compliance is 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 the site are taken into account.		

Frequency:	3G 2100Mhz
Modulation characteristics ²	QPSK
Power output (expressed in EIRP in dBW per carrier)	32 dBW
In order to minimise interference within its own network and with other radio networks, Vodafone Ltd 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 Vodafone Ltd's network, the radio base station that is the	
subject of this application will be configured to operate in this way	
Height of antenna (m above ground level)	15.75m (to top)

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² The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase modulation

The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation

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5. Technical Justification

Enclose predictive coverage plots.

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

PPG8 states that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support (paragraph 6). However, paragraph 5 of PPG8 highlights that in making an application for telecommunications development operators may be expected to provide evidence regarding the need for the proposed installation.

As explained earlier in this submission, the proposed installation is needed to provide 3G coverage to the local area around the application site.

The coverage plots and technical justification, enclosed with this application, provide an explanation of the operation of the network and the technical constraints on siting. Vodafone has identified a new 3G coverage requirement within this area and in which the coverage plots provide an indication of the projected radio coverage that will provided once the site is upgraded to support 3G. It can be seen from the plots that there is no existing 3G coverage and therefore a solution is required to fill the gap in coverage. The plots also clearly show how the proposed installation would fill the coverage gap to enable 3G service provision.

Further detail regarding the general operation of the telecommunications network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the planning authority in understanding any technical constraints on the location of the proposed development.

6. Site Selection Process – alternative sites considered and not chosen (Enclose map highlighting all alternatives that have been considered by the operator)

Site Name and address	NGR	Reason for not choosing
		2 00
		15 8
		12 45
	Site Name and address	Site Name and address NGR

If no alternative site options have been investigated, please explain why:

As explained in the pre-application consultation process, a search for suitable alternative sites within this area of the National Park highly impractical.

Whilst the Park Authority recognises that improved coverage is desirable, it is also recognised that it is unlikely that 100% coverage of the National Park will be possible. Therefore, as would be expected, there is only a relatively small number of existing telecommunications installations within the National Park that could be deployed generally and none within this

³ ETS – Existing Telecomm site, ES – Existing Structure, RT – Roof Top, GF – Greenfield

⁴ SP – Site Provider, RD – Redevelopment Not Possible, T – Technical Difficulties, P – Planning, O - Other

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locality. In this regard, Development Policy 25, 10.22 states that consideration should be given to utilising existing structures such as masts and pylons, and that apparatus should blend into the landscape. Further, the local Development Policy states there should be no unacceptable adverse visual impact upon the character of the locality and the wider landscape, and that siting makes use of the least environmentally intrusive option available.

Based on these criteria and the scarcity of alternative sites, the optimum solution is therefore the upgrade of the existing site. This is particularly so, as only a small change is required to the antenna and internal equipment to enhance and improve the technical service offering, yet the change will have no adverse visual impact.

As such, it is considered that alternative sites are not appropriate in this instance.

Additional relevant information:



Siting:

In the wider context, the site is located within the North York Moors National Park. In the more immediate context, the general landscape of the local area surrounding the site is a mix of open moorland, rural farmland and the Grouse Hill Caravan Park within which the site is actually located.

The existing installation comprises a 15 metre high lightweight slim-line lattice tower, with 2no 2G antennas above, to a height of 15.75 metres to the top of the antennas. In addition, Vodafone has a ground based equipment cabin near the base of the tower. This scheme was granted full planning consent by the National Park Authority on 13 August 1998 under application number 40290485.

The proposed development would see the retention of the 15 metre lightweight slim-line lattice tower and the equipment cabin. The development would comprise the removal of the 2no 2G only antennas and the replacement of these antennas with 2no 2G/3G antennas at the top of the lattice, the replacement antennas retaining an overall height of 15.75 metres to the top of the antennas. In addition, one extra equipment cabinet would be located inside the existing Vodafone cabin.

The siting takes advantage of the existing approved structure. It is considered that upgrading the existing structure is the optimum solution and one which fully balances the environmental impact considerations with the operational requirements. As such, the proposed development is in accordance with national and local policies, as set out below.

The proposal will retain existing access arrangements via the Grouse Hill Caravan Park and therefore will not have any additional impact on the existing highway network. Existing power supplies will also be used. Once the antennas are replaced, the site will continue to be visited infrequently for maintenance purposes only.

Visual appearance:

Vodafone recognises the need to minimise the visual impact of any new proposal on the site, and the importance of retaining the character of the locality and the wider landscape. Bearing this in mind, the changes required to facilitate the proposed development have been kept to an absolute minimum.

A direct antenna swap at the top of the tower is proposed, showing no overall increase in the number of antennas present or the overall height of the antennas. It is therefore considered that the proposed antenna changes would not be visually intrusive in the immediate or wider landscape and would not be detrimental to the character of the area.

The additional equipment cabinet required would be housed internally inside the existing equipment cabin, and would not be visible at all to the public. As such, the proposed cabinet addition would have no impact, adverse or otherwise, other than of course to provide additional 3G services.

In light of the operator's efforts to design the best solution for this particular site so as to minimise the impact of development on the environment, it is considered that the proposals represent the optimum solution to balance the needs to protect the National Park environment whilst at the same time providing enhanced services within the Park.

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National Planning Guidance

Planning policy is provided at the national level by Planning Policy Guidance Notes [PPGs] and Planning Policy Statements [PPSs]. The relevant national planning Policy Guidance is contained in PPG8, PPG7, PPS5 and PPS1.

It is not necessary to quote extensively from these documents but the following points are highlighted.

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PPG8 – Telecommunications (2001)

PPG8 'Telecommunications is the national planning document offering guidance to local authorities in the formulation of local plan policy and evaluation of telecommunications developments.

The overall aim of PPG8 is to allow for the growth of new and existing telecommunications networks in conjunction with environmental considerations. Paragraph 1 of PPG8 emphasises the Governments' generally positive approach to telecommunications: - "The Government's policy is to facilitate the growth of new and existing telecommunications systems whilst keeping the environmental impact to a minimum. The Government also has a responsibility for protecting public health." Paragraph 1, PPG8, 22 August 2001

PPG8 goes further and states that "The aim of telecommunications policy is to ensure that people have a choice as to who provides their telecommunication service, a wider range of services from which to choose and equitable access to the latest technologies". Paragraph 2, PPG8, 22 August 2001

Paragraph 7, advises that each telecommunications system have different antenna types, siting needs and other characteristics. "Planning Authorities should have regard to any technical constraints on the location and proposed development."

Paragraph 19 advises that 'in order to limit visual intrusion, the Government attaches considerable importance to keeping the number of radio and telecommunications masts, and of the site for such installations, to the minimum consistent with the efficient operation of the network'.

PPG8 strongly encourages the sharing of masts and sites where that represents the optimum environmental solution in a particular case [para 20]. Paragraph 21 also states that 'use should be made of existing buildings and other structures, to site new antennas. Local planning authorities may reasonably expect applicants for new masts to show evidence that they have explored the possibility of erecting antennas on an existing building, mast or other structure'.

PPG8 also provides guidance on the design of telecommunications masts encouraging the use of sympathetic design and camouflage to minimise the impact of the development on the environment. Particularly in designated areas, the aim should be for apparatus to blend into the landscape.

PPG8 acknowledges the commercial pressures placed of mobile telecommunications systems and that basis of demand for such services, confirming that: - "These systems are demand-

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led. Increase in the use of mobile phones has meant that operators are continually expanding their networks to accommodate customer requirements of service and quality. The greatest need for base station sites is usually in built-up areas where there is the greatest density of mobile users, and within a mile or two of the main roads, where the demands on network capacity are greatest." Paragraph 22, PPG8, 22 August 2001

With reference to design PPG8 confirms that operators should be innovative in their design solutions and should attempt to find solutions that minimise potential amenity and intrusion issues, stating that: - "The telecommunications industry is encouraged to continue to develop innovative design solutions, in terms not only of the structure of masts and antennas but also the materials and colouring. A number of different design solutions are currently available. These include masts designed to look like trees or street furniture, and the redevelopment or restoration of existing properties to incorporate telecommunications apparatus. Authorities may wish to discuss with operators different design and camouflage options in connection with development proposals. Operators are encouraged to provide examples of different design solutions. It should be borne in mind that some designs may not be suitable for future sharing. Where it is agreed that a site is suitable for future mast sharing, it may be appropriate to install a mast specifically designed to facilitate its redevelopment for sharing." Paragraph 77, PPG8, August 2001.

Both Paragraph 16 and Paragraph 64 of PPG8 refer to National Parks and highlight that proposals should be designed sensitively, and further that applicants must demonstrate that there are no suitable alternative locations. The design and location in this instance, involving a nominal change to an established telecommunications installation in the National Park, fully meets these criteria.

PPS5: Planning and the Historic Environment (2010)

PPS5 sets out planning polices on the conservation of the historic environment. It states that those parts of the historic environment that have significance because of their historic, archaeological, architectural or artistic interest are called heritage assets. Heritage assets include conservation areas and listed buildings [para 5].

Paragraph 7 of PPS5 sets out the Government's overarching aim which is that the historic environment and its heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations. To achieve this, the Government has set out a number of objectives which include:

- Delivering sustainable development by ensuring that policies and decisions concerning the historic environment: recognise that heritage assets are a nonrenewable resource; take account of the wider social, cultural, economic and environmental benefits of heritage conservation; and recognise that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term.
- Ensure that decisions are based on the nature, extent and level of that significance, investigated to a degree proportionate to the importance of the heritage asset; wherever possible, heritage assets are put to an appropriate and viable use that is consistent with their conservation; the positive contribution of such heritage assets to local character and sense of place is recognised and valued and consideration of the historic environment is integrated into planning policies, promoting place shaping.

Policy HE7.4 of PPS5 states that Local Planning Authorities should take account of the

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desirability of sustaining and enhancing the significance of heritage assets, and utilising their positive role in place-shaping; and the positive contribution that conservation of heritage assets and the historic environment generally can make to the establishment and maintenance of sustainable communities and economic vitality.

Policy HE10.1 of PPS5 states that when considering applications for development that affect the setting of a heritage asset, local planning authorities should treat favourably applications that preserve those elements of the setting that make a positive contribution to better reveal the significance of the asset.

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PPS1: Delivering Sustainable Development (2005)

PPS1 sets out the overarching planning policies for the delivery of sustainable development through the planning system. It states [para 5] that 'planning should facilitate and promote sustainable and inclusive patterns of urban and rural development' by making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life.

PPS1 is committed to promoting high quality inclusive design in the layout of new development and individual buildings in terms of function and impact. Design which fails to take the opportunities available for improving the character and quality of an area should not be accepted [para 13iv].

PPS1 advocates the need for good design which should contribute positively to making places better for people. High quality and inclusive design should create well-mixed and integrated developments, ensuring a place will function well and add to the overall character and quality of the area, not just for the short term but for the lifetime of the development. Design which is inappropriate in its context, or which fails to take opportunities available for improving the character and quality of an area and the way it functions, should not be accepted [para 33-35].

Paragraph 35 goes on to state that good design goes beyond aesthetic considerations and should include being integrated into the existing urban form and the natural and built environments.

The Government is committed to developing strong, vibrant and sustainable communities and to promoting community cohesion in urban and rural areas. This means meeting the diverse needs of all people in existing and future communities, promoting personnel well being, social cohesion and inclusion and creating equal opportunities for all citizens [para 14].

Code of Best Practice on Mobile Phone Network Development

The Code of Best Practice was published in November 2002 and produced jointly by all Mobile Phone Operators, and representatives of Central and Local Government. It provides clear and practical advice to ensure that delivery of significantly better and more effective communication and consultation between operators, local authorities and local residents.

Paragraphs 140 - 145 identify general design principles in which camouflaging or disguising equipment is considered materially appropriate. In reducing the environmental and visual impact of the installation the Code of Best Practice promotes the use of simple and uncomplicated designs. Paragraph 148 recognises that "Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts." In this regard, the proposed nominal changes to an existing approved design will

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ensure that the environmental and visual impact of the equipment remains low.

Environment Act 1995

S61 and S62 of the Environment Act 1995 places a duty on relevant authorities, including "statutory undertakers" (which term is for the purposes of this submission deemed to include Vodafone as the applicant) to have regard to National Park purposes as set out below.

"The provisions of this part of the [Environment] Act shall have effect for the purpose -

- (a) of conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified in the next following subsection; and
- (b) of promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public."

An extract from s62 is included herein, explaining those duties in more detail.

s62 - Duty of certain bodies and persons to have regard to the purposes for which National Parks are designated.

- "(1) A National Park authority, in pursuing in relation to the National Park the purposes specified in subsection (1) of section five of the [National Parks and Access to the Countryside] Act [1949 National Parks], shall seek to foster the economic and social well-being of local communities within the National Park, but without incurring significant expenditure in doing so, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the National Park.
- (2) In exercising or performing any functions in relation to, or so as to affect, land in a National Park, any relevant authority shall have regard to the purposes specified in subsection (1) of section five of the 1949 Act and, if it appears that there is a conflict between those purposes, shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park."

In relation to this legislation, both the issue of potential conflict and the relevant weight of the initial proposal to install the site, measured against the purposes of a National Park, were fully considered in the original planning application process in 1998, when the site was granted consent. These matters have been re-considered by the applicant during the present process for the proposed upgrade development, and it is considered that there is no conflict between the proposed development and the purposes of the National Park.

In particular, it is not considered that there is any detrimental affect to the conservation of the natural beauty, wildlife and cultural heritage of the National Park. Indeed, it is considered the availability of enhanced services and communications to the area may provide opportunity to promote the understanding and enjoyment of the special qualities of the National Park to the public benefit.

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the

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planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise"

The development plan as defined by the Planning and Compulsory Purchase Act 2004 comprises The Yorkshire and Humber Plan Regional Spatial Strategy to 2026 and the North York Moors National Park Authority Local Development Framework, Core Strategy and Development Policies.

The Yorkshire and Humber Plan Regional Spatial Strategy to 2026

There are no specific policies relevant to the application in this document.

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

The North York Moors Local Plan (2003) was automatically saved on commencement of the Planning and Compulsory Purchase Act 2004 for 3 years i.e. until September 2007. The Secretary of State subsequently issued a direction to save specified policies beyond this 3 year period. The policies in the North York Moors Local Plan (2003) were replaced by the above, when the policies above were adopted on 13th November 2008. As such, these policies will continue to form the basis on which planning decisions are made until they are replaced by new policies in the Local Development Framework.

Development Policy 25 - Telecommunications

Development Policy 25 (DP25) Telecommunications (which replaced Policy U1 Telecommunications from the former Local Plan) is the extant relevant local telecommunications policy. Additionally, applicants are referred to the national telecommunications policies in PPG8. DP25 states as follows:

"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 purpose of the proposed development is to enable the applicant to provide both 2G and 3G services, in accordance with Vodafone's licence obligations, to the areas of the National Park centred around the existing Vodafone radio base station at Grouse Hill Caravan Park. At present, only 2G services are available.

In relation to paragraph 1 of DP25, the cell centre is the existing established radio base station at Grouse Hill Caravan Park, which integrates into the Vodafone network. As such, there is very limited scope to provide an alternative means of provision, other than the existing

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Vodafone site. Hypothetically, were alternative means of provision available, it should be noted this could result in the presence of two radio base station sites in the locality, one to carry the existing 2G services and the other to carry the proposed 3G service capability. As such, it is evident that by upgrading the existing Vodafone facility to enable both 2G and 3G services to be provided, this is the optimum solution available.

Paragraph 2 of DP25 requires that there is no unacceptable adverse visual impact upon the character of the locality and the wider landscape. The chosen design maintains the core slimline lightweight lattice tower structure, but replaces the 2G only antennas at the top of the tower with combined 2G/3G antennas that are of a similar size and appearance, and which do not require any height increase to the top of the antennas. An additional equipment cabinet is also be installed internally within the Vodafone equipment cabinet, and this will not be visible to the general public. The overall design is as minimal as possible, and sensitive to the special considerations within the National Park. The design is such that there will be no adverse visual impact upon the character of the locality and the wider landscape, and is therefore fully compliant with paragraph 2 of DP25.

Paragraph 3 of DP25 requires the use of the least environmentally intrusive option available. By using the existing approved and well established installation, and making very minimal changes thereto, the proposed development ensures the use of the least environmentally intrusive option. As such, the proposal is fully compliant with paragraph 3 of DP25.

Paragraph 4 of DP25 requires that the proposal is part of a co-ordinated, long term strategy for the provision of telecommunications technology. In this regard, the development is required to provide enhanced service and coverage to the locality, by delivering 3G services to overlay and complement the existing 2G only service provision. As such, the proposed upgrade represents a planned and co-ordinated strategy to deliver long term technology benefits to the locality and system users. The proposal is therefore fully compliant with paragraph 4 of DP25.

Paragraph 5 of DP25 requires the removal of redundant equipment. It is the intention that the existing 2G antennas will be removed to be replaced by the upgraded 2G/3G antennas. In the longer term, and in line with the main thrust of paragraph 5, should the overall site ever become redundant then the equipment could be removed. This can be conditioned, as required, by the planning authority as part of the decision process.

Summary

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

- With specific regard to telecommunications development, the proposal accords fully with PPG8; the Code of Best Practice; and local policy DP25;
- Site selection was progressed in accordance with the applicants licence obligations, advice in PPG8, the Code of Best Practice and DP25, and represents the least environmentally intrusive, technically suitable, available option;
- The design has been kept to an absolute minimum to ensure there is no visual intrusion, at the same time allowing the applicant to upgrade the site to provide enhanced services;
- The applicant has opted to retain connecting the site into the national network via an underground link rather than rely on a transmission dish, which Vodafone judged might affect the linear nature of the design and increase its prominence;

- The proposals would not constitute a proliferation of telecommunications installations as advocated by PPG8; and
- The significance of the proposal in the development of the Vodafone network is a material consideration and this site is required in order to contribute towards the obligation to provide coverage to 80% of the population.

Contact Details

Name: (Agent)	Paul Lapatrie	Telephone:	0161 242 8054	
		Fax No:	0161 228 7354	
Operator:	Vodafone Ltd			
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Signed:	Vagabre	Date:	14/04/2011	
Position:	Paul Lapatrie Director	Company: (Agent) (on behalf of Vodafone Ltd as a duly authorised agent of Clarke Telecom Ltd)	Lambert Smith Hampton	

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<u>APPENDIX A – TECHNICAL JUSTIFICATION AND CELL PLOTS</u>

THE REMOVAL OF 2NO. VODAFONE 2G ANTENNAS AT THE TOP OF THE EXISTING SLIM-LINE LATTICE TOWER AND THE REPLACEMENT THEREOF WITH 2NO. 2G/3G ANTENNAS AT THE TOP OF THE EXISTING SLIM-LINE LATTICE TOWER TOGETHER WITH THE INSTALLATION OF 1NO. EQUIPMENT CABINET INSIDE THE EXISTING GROUND BASED EQUIPMENT CABIN AND ANCILLARY DEVELOPMENT THERETO ALL AT GROUSE HILL CARAVAN PARK, BLACKSMITH HILL, WHITBY, NORTH YORKSHIRE, YO22 4QH.

As indicated in the supporting statement Appendix A contains coverage plots illustrating the operational affect of and the technical requirement for the proposed installation.

