SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Halifax Road	Site Address:	Halifax Road DNS Halifax Road Dewsbury Yorkshire WF17 7BA
NGR:	E: 423356, N: 423345		
Site Ref Number:	68802	Site Type: Macro	NTQ (Notice to Quit Replacement)

2. Pre Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why: After a phone call to the LPA it was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Annual roll out consultation with LPA

Date of last annual rollout information/submission:	This information can be emailed to the LPA on request
Name of Contact:	This information can be emailed to the LPA on request
Summary of outcome/Main issues raised:	This information can be emailed to the LPA on request

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	11th April 2016
Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	The Director of Planning

Summary of outcome/Main issues raised: At the time of preparing this submission, and despite our attempt to engage in pre-application dialogue with the LPA, no comments had been received in respect to the proposals.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green		
Prior to the submission of this application the applicant initiate pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues.			
Summary of outcome/Main issues raised: No response has been received at the time of submission.			

School/College

Location of site in relation to school/college: There are no schools is in close proximity to the site.
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?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	25th April 2016 & 12th September 2016	

3. Proposed Development

The proposed site:

PLEASE NOTE THAT THIS IS A RESUBMISSION OF THE APPROVED APPLICATION 2016/53/91348/E APPROVED BYKIRKLEES ON 20/6/2016.

The approved site cannot be constructed due to underground service issues and thus a new application has been submitted to alleviate this issue. The equipment has been marginally moved to re-locate the equipment away from the gas main, this is the only change to the previously approved proposal.

It is imperative to consider that this is not a new additional site but a replacement for the exiting installation at Dewsbury Hospital. The DSA (Designated Search Area) covers a small area in Dewsbury, a town in West Yorkshire. The NTQ (Notice to Quit) site is Dewsbury Hospital (Cell: 68802) who have confirmed the building housing the existing site is to be demolished. This proposal is to locate a permanent solution for the existing NTQ site.

The search area mainly consists of hospital grounds and a small residential area. The hospital have confirmed that they are not interested in relocating the site so a new installation beyond the confines of the hospital is imperative. The proposed site has been located to the side of Staincliffe Sports and Social Club on the adopted pavement of Halifax Road. To the rear of the proposed site there are a number of advertising boards which shield the lower reaches of the installation.

Fig. 1 – Location Plan (Cell Survey Area – taken from DSA Form as issued – WF13 4HS)

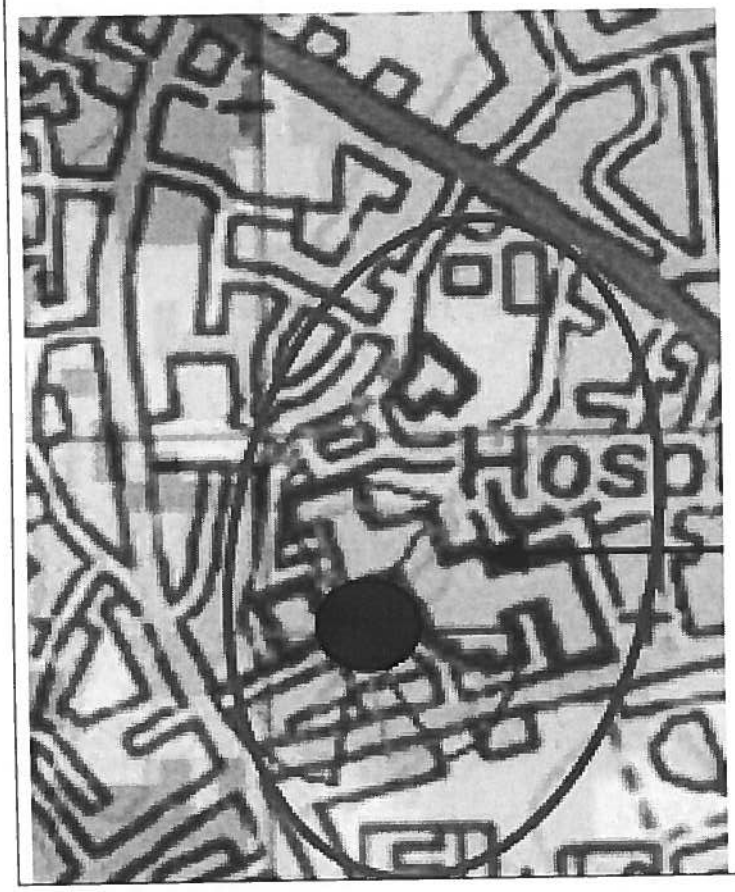


Fig.2 – Historic England Map extract (for reference purposes only)

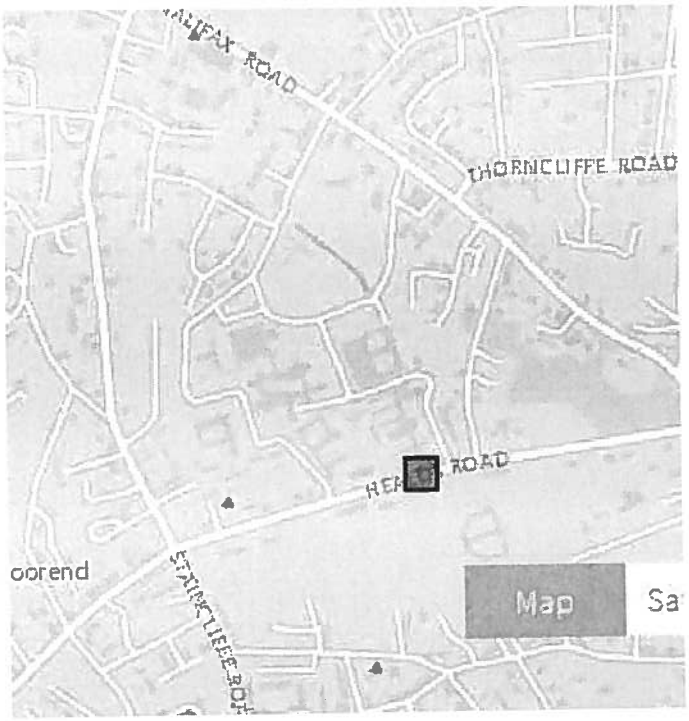
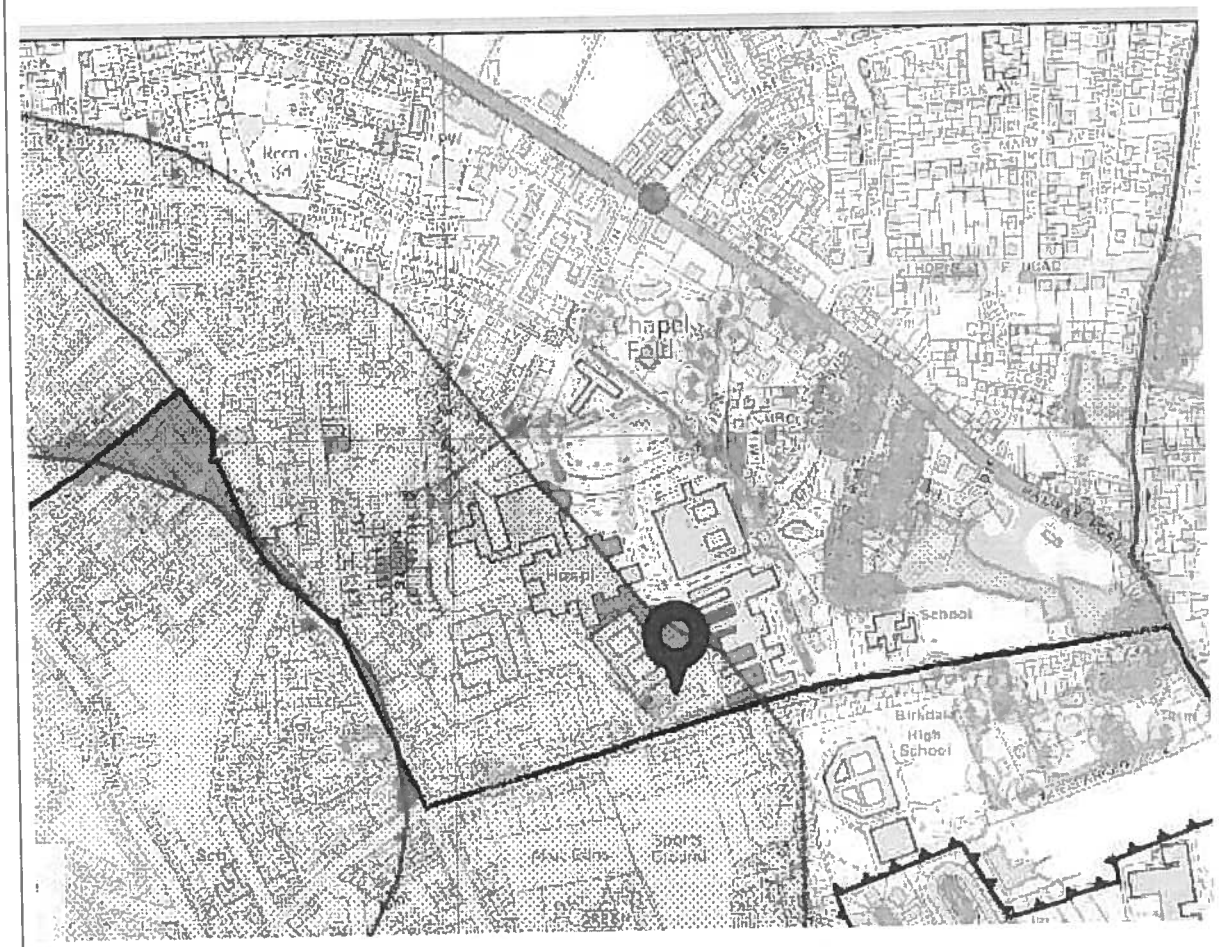


Fig.3 – LP Map extract (for reference purposes only)

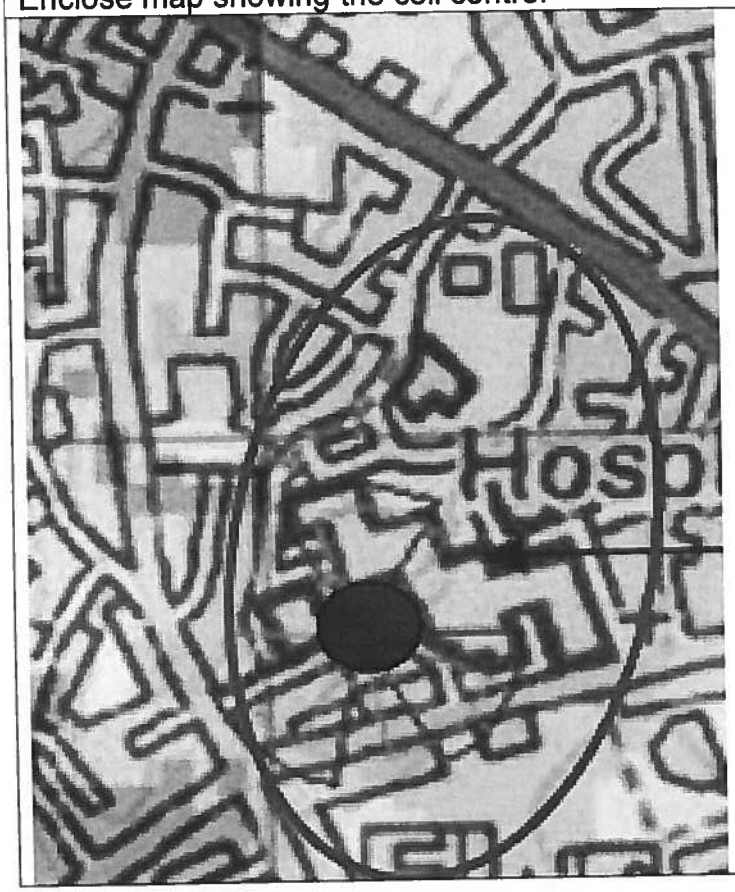


NOTES (identified planning constraints):
Listed Buildings – Various (See Historic England extract above (Fig. 2)) – LB's are identified by blue triangles)
Green Belt – NONE
Statutory Ecological Designations – NONE
Conservation Areas / Heritage Assets – NO

Central Government attaches great importance to the design of the built environment and outlines this within Section 7 (para. 56) of the National Planning Policy Framework. It states: "Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people".

In keeping with the National Planning Policy Framework (NPPF). guidelines of using: "high quality communications infrastructure", the proposed street works monopole design has been selected to minimise visual impact upon the street scene by integrating with the existing street furniture, having similar vertical lines and overall appearance to the street lighting columns that are common feature in the built environment.

Enclose map showing the cell centre.



Type of Structure

Description:

Tower Details:

15m Phase 5 Streetworks Tower with GRP Shrouded Headframe mounted on root foundation
Colour: Galvanised

Cabinet Details:

Cabinet Ref: FLEXI Units and UCU within FREDO Cabinet on root cast in concrete base
Dimensions: 900 x 800 x 1260 High
Material: Steel
Colour: Grey

MK4 Link/AC Cabinet on root cast in concrete base.
Dimensions: 600 x 500 x 1520 High
Material: Steel
Colour: Grey

BTS3900A on 200 plinth on side by side root foundation
Dimensions: 2No. 600 x 480 x 900 High
Material: Steel
Colour: Grey

KOMODO Cabinet on root foundation
Dimensions: 1230 x 400 x 1524 High
Material: Steel
Colour: Grey

Proposed 300 DIA Transmission Dish

Overall Height: 15.0m AGL	
Height of existing building	N/A
Equipment Housing:	
Length:	
Width:	
Height:	
Materials	
Tower/mast etc – type of material and external colour:	
Equipment housing – type of material and external colour:	

Reasons for choice of design:

Central Government attaches great importance to the design of the built environment and outlines this within Section 7 (para. 56) of the National Planning Policy Framework. It states "Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people".

The proposed installation is an EE LTD Phase 5 Street work Pole which will house both

Orange and T-Mobile. The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF In keeping with the National Planning Policy Framework (NPPF). guidelines of using "high quality communications infrastructure", the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing street furniture, having similar vertical lines and overall appearance to the numerous street lighting columns (approx. 8m in height) running along the length of Halifax Road.

4. Technical Information

ICNIRP Declaration attached 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.	Yes	

Frequency:	This information can be emailed to the LPA on request
Modulation characteristics[1]	As above
Power output (expressed in EIRP in dBW per carrier) In order to minimise interference within its own network and with other radio networks, (EE 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 (EE LTD)'s network, the radio base station that is the subject of this application will be configured to operate in this way.	As above
Height of antenna (m above ground level)	15m

5. Technical Justification

Reason(s) why site required
The National Planning Policy Framework clearly states that authorities should not question the

[1] 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

need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.

Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.

The site is required to provide new replacement 3G and 4G coverage for EE LTD in order to improve and maintain coverage in the WF17 area of Dewsbury. The cell search areas for 3G and 4G are extremely constrained with a typical cell radius of approximately 250m meaning that it would not be feasible to site the column outside of this locale.

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

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

Discounted Options

In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF) following search criteria have been utilised. Firstly consideration is always given to sharing any existing telecommunication structures in the area, secondly consideration is then given to utilising any suitable existing structures or buildings and thirdly sites for freestanding ground based installations are investigated.

This sequential approach is outlined below:

a) Mast and Site Sharing
b) Existing Buildings Structures
c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPPF all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Ofcom Site Finder mast register is always examined prior to the submission of an application.

D1 – Mid Yorkshire Hospital NHS Trust – GF – NGR: E 423236 N 422931 -
Site discounted due to SP not being interested in relocating site.

D2 – Dewsbury Pharmacy – GF – NGR: E 423122 N 422664
Site discounted due to SP not being interested. Also due to close residential buildings site would not get planning.

D3 – Healds Road DNS – SW – NGR: E 423048 N 422659 –

Site discounted due to tree clutter. Also due to the close residential buildings site would not get planning.

D4 – Saint Josephs Catholic Primary School - RT – NGR: E 423429 N 422791
Site discounted due to no response from SP so assume not interested.

D5 – Cullingworth Street DNS - SW – NGR: E 423113 N 423097 -
Site discounted due to lack of space from maintenance works. Also due to the close residential buildings site would not get planning.

D6 – Stainecliffe Cricket Club – GF – NGR: E 423120 N 423350
Site discounted due to cricket club being council owned so unlikely to get planning approval.

D7 – Heckmondwike Service Station – GF – NGR: E 423252 N 423166
Site discounted due to no response from SP so assume not interested.

Map of discounted options:

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

N/A

7. Additional Relevant Information

Background to the Proposal

This specific proposal forms part of an integral requirement for EE LTD and H3G LTE to maintain and expand their respective 3G and 4G telecommunications network across Dewsbury specifically in this instance to enhance 3G and 4G coverage levels and network capacity within the WF17 area.

This partnership has resulted in the development and production of an array of "dual user" structures and cabinets, which have the ability to accommodate both operator's antenna systems and radio equipment.

Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using their mobiles in their homes and this means we need to position base stations in, or close to, residential areas.

A further limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However if this overlap is too great unacceptable interference is created between the two cells.

DEVELOPMENT PLAN POLICY.

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, it is stated that:

"Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise."

NATIONAL PLANNING POLICY

PPG8 and PPS1 have been replaced by the National Planning Policy Framework (NPPF) (March 2012). This document condenses the advice outlined previously although the broad principles of promoting the expansion of electronic communication networks remain the same:

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied at the Local level. It provides a framework within which local people

and their accountable Councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including;

- Economic Role – contributing to building strong, responsive and competitive economy;
- Social Role – Supporting strong vibrant and healthy communities; and
- Environmental Role – Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes.

Paragraph 19 states that "The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system".

It continues in Paragraph 20 to confirm Central Government advice that "To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century". The following paragraph states "Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure"

Section 4 of the NPPF (Paragraph 29) encourages the "smarter use of technologies" to reduce the need to travel and promote sustainable transport methods in accordance with the central sustainable development thread which travels through the Framework.

The most pertinent section of the NPPF to the proposed development is that contained within Section 5: Supporting High Quality Communications Infrastructure.

There is recognition from Central Government in Paragraph 42 that "Advanced, high quality communications infrastructure is essential for sustainable economic growth" which will in turn play a vital role in developing provisions within the local community of both facilities and services.

Paragraph 43 identifies the need to "keep the number of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network". In doing so, Central Government encourages the use of existing masts, buildings and other structures unless the need for a new site can be justified. Where such new sites are required, it is suggested that, where appropriate, equipment should be sympathetically designed and camouflaged.

Paragraph 45 defines the evidence that should be supplied to justify the proposed development. This should include:

- "The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a

school or college or within a statutory safeguarding zone surrounding an aerodrome or technical site; and

- for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission on non-ionising radiation protection guidelines; or

- for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met."

Confirmation that Local planning authorities must determine applications on planning grounds is also contained in Paragraph 46. In determining applications, it is the contention of Central Government that LPAs 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 (ICNIRP) guidelines for public exposure.

Central Government attaches great importance to the design of the built environment and outlines this within Section 7 (para. 56). It states "Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people".

In respect to good design, decision making should aim to ensure that any proposal deemed appropriate would "function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development" and "respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation".

In determining planning applications "great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area". Paragraph 63.

It is the intention of the NPPF that "Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits)". Paragraph 65.

Paragraph 66 clarifies that "Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably".

Conclusion

We consider that the development is complaint with the council's policy and that in accordance with Section 38 (6) of the Planning and Compensation Act 2004 permission should be granted for the installation.

We consider the development complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community while minimising visual impact.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

On the basis of a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the requirements of the National Planning Policy Framework and the Council's Local Plan Policies.

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Signed:		Date:	13th September 2016
Position:	Planning Manager	Company:	WHP
		(on behalf of above operator)	