

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Staincliffe Road DNS 2	Site Address:	Existing Mast Staincliffe Road Dewsbury WF13 4RA
National Grid Reference:	E:422878 N:422973		
Site Ref Number:	EE_74773_MBNL_KKS200_3UK_WF0304	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		No
If no explain why: Upgrade of existing electronic telecommunications base station.		
Were industry site databases checked for suitable sites by the operator:		No
If no explain why: Upgrade of existing electronic telecommunications base station.		

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation	10.05.2019
Was there pre-application contact	No
Date of pre-application contact	
Name of contact	
Summary of outcome/Main issues raised: Letters and plans were emailed to the LPA informing them of the proposal on 10.05.2019. No site-specific comments received.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model	Amber
Outline of consultation carried out: Prior to the submission of this application the applicant initiated pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues. Letters and plans were emailed to the Ward Councillors (Dewsbury East and Batley West) and local MP Tracey Babin informing them of the proposal on 10.05.2019 and 14.05.2019).	

¹ Macro or Micro

Summary of outcome/main issues raised:

Cllrs Lukic, Pandoor and Hussain in emails dated 12.05.2019 and 14.05.2019 raised concerns regarding visual amenity and the potential for the pole to dominate neighbouring residences visually.

In response, it is acknowledged that the proposed equipment is slightly larger than that in situ, however it needs to be as set out below:

The growth of digital connectivity over the last few decades has transformed all aspects of life within the UK. It has provided the opportunity to work differently, to socialise and interact differently, to bring the world closer and to offer new commercial opportunities. The internet and mobile connectivity rely upon the deployment of new fibre networks. Utilising these fibre networks allows each mobile base station to link back into the wider core network, however, the requirements in the future are for ubiquitous coverage and this will mean the more complex, more remote locations throughout the country will need further new installations. In addition, 5G offers download speeds far in excess of what can be achieved today, even by fixed line broadband. Such increased speeds and low latency provides the potential for far greater opportunities.

Examples of this new world that will emerge from ubiquitous 5G coverage involves such things as connected and autonomous vehicles, traffic management, smart manufacturing with heterogeneous autonomous machines, direct machine to machine communication, advanced medical devices, automated agriculture, far greater security provision, more stable and reliable connectivity and advances in further application development with uses not yet identified. All of the above provides an insight into the future development of connectivity in our modern world and also provides a further insight into the expected minimum eight-fold increase in data usage by each mobile operator over the next 5-6 years.

“Getting 5G deployment right will be critical in a future where connectivity is becoming integral to almost all parts of the economy, and the UK will put its future growth and competitiveness at risk if it falls behind”.

‘Connected Future’ National Infrastructure Commission 2016

The initial rollout of equipment will be concentrated on a macro level, that being the upgrading of main hub sites but also coupled with new standalone sites. 5G has to be deployed smoothly and effectively and as such many existing rooftops and stand-alone greenfield towers will need to be upgraded and redeveloped to accommodate the new equipment and antennas.

Notably, 5G operates across multiple spectrums and therefore requires additional antennas and new equipment cabinets. The higher frequencies that 5G will use can provide more bandwidth and thus greater capacity but the signal will not travel as far as those of previous generations. The implications to the built environment will be that more infrastructure needs to be deployed with the added significant increase in capital required. In order to meet future demands for connectivity the new installations will have to be designed to optimise the network and thus provide a public benefit in addition to the existing telecoms generations and frequencies used. Additional structures and ancillary equipment on existing sites will also be complemented by new sites and it is anticipated that in high demand areas such as city centres further new installations will be required.

In order for the UK to benefit from the huge potential of 5G Local Planning Authorities will have to weigh the Public Benefits of such connectivity with the requirements to instruct and manage the built environment. Central Government understands that this may present concerns with the various design solutions proposed but it is important that all Local Planning Authorities understand the technical needs of 5G and better understands the wider advantages of such new technology. This is further emphasised within the National Infrastructure Commission’s report in 2016, where National Digital Strategy will be directed through the Economy and Industrial Strategy Cabinet Committee in order to:

“Support and challenge local government in their plans to enable the delivery of digital infrastructure; both in terms of ensuring that these plans help the UK to meet its national

objectives, and that local authorities develop consistent approaches to support the deployment of mobile infrastructure across the country”.

‘Connected Future’, National Infrastructure Commission 2016

School/College

Location of site in relation to school/college (*include name of school/college*):

- *Staincliffe C of E Junior School (circa 500m north)*

Given the distance between the application site and this educational establishment no pre-application consultation was undertaken.

Outline of consultation carried out with school/college (*include evidence of consultation*):

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 Full Planning Application.		

Developer's Notice

Copy of Developer's Notice enclosed?		No
Date served:	N/A Full Planning Application.	

3. Proposed Development

The proposed site:

The application site is host to an existing 15.0m monopole within the built-up area of Dewsbury, where there is a very high demand for mobile services.

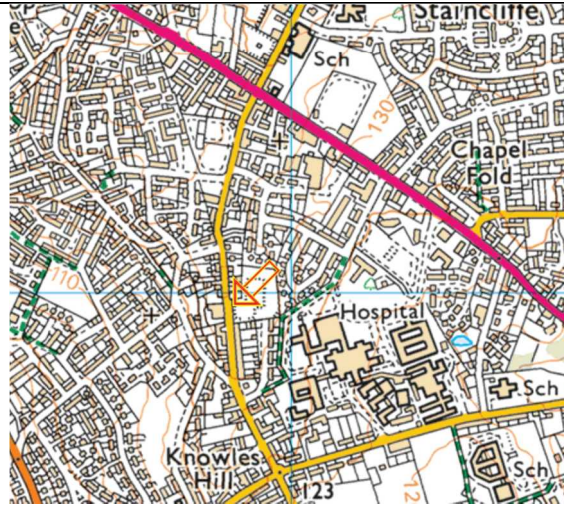


Fig 1: The existing site is located on the eastern side of Staincliffe Road



Fig 2: Bird's eye view looking north, illustrates that the site and surrounding area are primarily residential in nature with a covered reservoir being located immediately to the east of the application site

The site has been chosen as this is the most suitable option, where the principle of development has already been accepted by the Council (2016/91869) and has become part of the established streetscene.

The application site is situated to the rear of the pavement on the eastern side of Staincliffe Road, adjacent to Squirrel Hill Covered Reservoir. Immediately adjacent to the site is boundary wall and 3m high palisade fencing associated with the reservoir. Streetlighting columns and telegraph poles line Staincliffe Road at regular intervals. The existing monopole integrates well with this existing

streetfurniture and covered reservoir with associated paraphernalia which form a backdrop to the existing installation.



Figure 3: Street view looking south down Staincliffe Road of existing pole in the context of existing streetfurniture and Dewsbury Hospital chimney

Staincliffe Road is a busy north south route linking the B6117 and A638, which is primarily residential in nature with pockets of commercial uses.



Figure 4: Birdseye view looking east towards Dewsbury Hospital

Full consideration has been given to alternative sites and existing masts. However, the proposed location and design are considered to be the optimum solution in this instance. As this proposal is an upgrade to the existing radio base station with minimal alterations to the overall appearance of the equipment currently in situ, no other alternative options have been considered. Notably, Staincliffe

Road streetworks was a replacement for a previous site at Dewsbury Hospital following a Notice to Quit at Dewsbury Hospital. The proposal is therefore to upgrade the existing radio base station with minimal alterations subject to technical constraints

It is not considered that the design and appearance of this replacement proposal would be detrimental to the character and appearance of the locality.

Type of Structure: Phase 7 Monopole

Description:

The replacement of an existing 15.0m monopole with a 20.0m high monopole supporting 12 no antenna apertures, together with the installation of ground-based equipment cabinets and ancillary development thereto.

Tower Details: -

20.0m Phase 7 Monopole

Material: Steel

Colour: Goosewing Grey

Cabinet Details: -

1 x Diplexer Cabinet

Dimensions: 1600 X 600 X 1600

Material: Steel

Colour: Grey

1 x HW Cabinet

Dimensions: 600 X 480 X 1900

Material: Steel

Colour: Grey

4 x HW Cabinet

Dimensions: 600 X 480 X 1800

Material: Steel

Colour: Grey

1 x Wiltshire Cabinet

Dimensions: 2000 X 750 X 1850

Material: Steel

Colour: Grey

1 x MK5 Link AC Cabinet

Dimensions: 1200 X 500 X 1700

Material: Steel

Colour: Grey

Overall Height:	20.0m
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Height of existing building (<i>where applicable</i>):	N/A
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Equipment Housing:

Length:	See plans
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Width:	See plans
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Height:	See plans
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Materials (*as applicable*):

Tower/mast etc – type of material and external colour:	Phase 7 Monopole Material: Steel Colour: Grey
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Equipment housing – type of material and external colour:	Material: Steel Colour: Grey
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Reasons for choice of design, making reference to pre-application responses:

Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (Paragraph 124) National Planning Policy Framework (Revised). It states:

'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'.

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 surrounding environment.

The choice of design has been heavily influenced by technical constraints as well as the existing base station's siting and appearance, the technologies it currently supports, as well as the added emphasis to cater for future 5G coverage and capacity requirements. It is also noted that the application site is not found within Article 2(3) land.

Notably, there are 3 main elements to a radio base station; the cabin or cabinets contain the equipment used to generate the radio signals(s), the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with the necessary amplifier or receiver units). Other elements necessary for the base station to function are a power source, feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as *'development ancillary to'* the base station.

In order for the base station to effectively provide coverage to the desired areas and fit in with the established network pattern, specific antenna orientations and heights, determined by network radio planners, must be achieved. Features of the surrounding area such as existing buildings and trees referred to as 'clutter' must be cleared so the antenna can 'see over' any obstructions in order that they do not block the signals from the antennas. There are also limitations on how from the antennas the equipment housing can be placed, as the quality of signal deteriorates as the length of feeder cables linking them increases.

In this case to achieve EE and H3G's upgrade requirements, a taller and wider design solution is proposed, together with additional cabinets.

In this regard is of note that the design put forward in this case, necessitates the need for a formal planning application by virtue of The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 2) Order 2016 which has introduced a one third ruling (A.1.(l)(d)(ii)).

The replacement tower will resemble the existing mast as closely as possible subject to technical constraints. To this end, the operators have opted for a monopole which is capable of meeting future demands for 5G connectivity. The height of the new column will be increased to 20.0m above ground level with the antenna apertures being located in an open stacked formation at the top of the pole. This open stacked formation is the least intrusive and efficient way of providing 5G connectivity to Dewsbury. Shrouding the antennas would lead to unwarranted inefficiencies and reduce the ability of this site to maximise the opportunity of providing the necessary 5G coverage to the target coverage area.

The pole has been relocated to the north of the existing pole, this will enable existing 2G/3G/4G services to be maintained to the area when the new pole is built and integrated into the network. When the new site is fully integrated into the network the existing site will be decommissioned and removed.

The proposed upgrade proposal involves the installation of an additional 8 no equipment cabinets. The equipment cabinets are each less than 2.5m³ and can therefore be installed under the operators permitted development rights as set out in the Town and Country Planning (General Permitted

Development) (England) Order 2015 (as amended) in Part 16 Schedule 2 of Class A. They have only been included on the plans and in the description in order to remain fully transparent.

As with the existing installation, the proposed column will be viewed against the backdrop of the covered reservoir and associated palisade fence and Dewsbury Hospital chimney and within the context of other linear features including streetlighting columns and telegraph poles and therefore the development will not appear unduly prominent when viewed from within the immediate vicinity or the wider surrounding area, given its siting, scale and design.

The height of the proposed tower is minimum capable of providing the technological improvements sought and the satisfying ICNIRP requirements. Whilst it is acknowledged that there is a significant increase in the scale of telecommunications development on the site, it should be noted that the technical requirements of mobile communication operators such as the applicant are acknowledged in the National Planning Policy Framework which states that local planning authorities should support the expansion of electronic communications networks, including telecommunications and high-speed broadband.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design of this replacement installation represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site. Taking all matters into account it is considered that this proposal to deliver the capability for a new 5G network and replacement 2G/3G/4G services for two competing operators from a single network installation, would not appear out of place within the local or wider area.

4.0 Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)*	Yes	
International Commission on Non-Ionizing Radiation Protection 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 or near to the site are taken into account.		
In order to minimise interference within its own network and with other radio networks, EE UK Ltd and H3G UK Ltd's network 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 UK Ltd and H3G UK Ltd's 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, who are 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.		

5.0 Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

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

The National Planning Policy Framework clearly states that authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

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

The NPPF states at Paragraph 112:

'Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections'.

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. So, if a person is on the move, the network will transfer their calls from one site to the next. The size and shape of each cell area is determined by the features of the surrounding area, such as buildings, trees and hills which can block signals.

Mobile connectivity is becoming ubiquitous and the expectation is that it should be available throughout the country. From the first generation of analogue phones to modern 4G enabled smart phones, people have embraced the benefits provided by increased connectivity and the applications that smart phones can control. As digital systems and mobile telephony develop it has become apparent that the mere requirement to make a telephone call is secondary to the overall advantages and opportunities that modern smart phones and increased data speeds can offer.

"We will build a Britain that lives on the digital frontier, with full-fibre broadband, new 5G networks and smart technologies"

BEIS Industrial Strategy – Building a Britain fit for the Future 2017

It is anticipated that the next generation of smart phones will be only a small part of wider mobile connectivity. The first generation provided voice calls, the second generation allowed basic data such as texting and the third generation offered internet access and the development of apps. Since then the smart phone has developed further and the fourth generation has brought video and much faster data speeds allowing the integration of the smart phone into wider use.

In a letter dated 07 March 2019 'Collaborating for digital connectivity', Ministers from the DCMS and MHLG wrote to the CEOs of all Local Planning Authorities in England asking them to support the investment necessary to make the United Kingdom world leader in 5G, with the majority of the population covered by 5G signal by 2027.

The importance of mobile technology in the UK, and its contribution to social and economic development is highlighted in series of annual 'Connected Nations' reports by Ofcom.

In the Ofcom Infrastructure Report - Connected Nations 2016, the report notes that *'the United Kingdom depends on various infrastructures, and one of the most important is the nation's communications. It goes on to state that 'fast, reliable communications enable businesses to generate prosperity and employment, and our countries to compete. They empower every citizen to take a full part in society and benefit from life's opportunities. Communications also save lives, bind families and friends together, and keep us entertained'.*

The report acknowledges that 'part of Ofcom's role is to make sure that, as far as possible, we can make the calls we want to, where we need to, and that we can use the internet at acceptable speeds.

The key findings of the report are set out in the Concise Summary Connected Nations 2016. It found that people are consuming more data as fixed and mobile services become increasingly woven in to the fabric of their daily lives and work (para 2.1).

However, paragraph 2.2 of the Concise Summary report notes that for a significant number of consumers, and in many parts of the country, fixed broadband speeds are slow and mobile coverage is poor or indeed non-existent. Ofcom is therefore continuing to work with the industry, the UK Government and the devolved administrations to explore ways to improve the availability and performance of these vital communications services.

On 15 December 2017 Ofcom published Connected Nations 2017. The report acknowledges that as communications play an increasingly critical role in our lives, the supporting infrastructure must keep pace with the needs of people and businesses. Part of Ofcom's role is to help ensure that people across the UK can access a decent internet service, and make phone calls where and when they need to.

The Connected Nations Report 2017 found that since the report was first published in 2011 coverage has grown and people and businesses are better connected. However, it notes that in too many areas coverage is still poor, broadband speeds are slow and mobile services are unreliable or not available.

Connected Nations 2018, states *'people now rely on being connected through calls and online services more than ever. So, it is important they have access to reliable, good quality mobile communications, to help them keep in touch with friends and family, shop and pay bills online, or stream the latest must-see TV series.*

In 2018, 82% of England's landmass has good 4G coverage from all four mobile operators. Voice services cover from all 4 operators cover 91% of England's landmass. Individual operator coverage for 4G is higher, at between 89% and 95% of England's landmass. 78% of homes and businesses have good indoor coverage from all 4 operators.

The benefits to commerce, industry and public in general are well recognised. The proposed upgraded installation will form an essential part of EE and H3G's 5G networks.

The growth of digital connectivity over the last few decades has transformed all aspects of life within the UK. It has provided the opportunity to work differently, to socialise and interact differently, to bring the world closer and to offer new commercial opportunities. The internet and mobile connectivity rely upon the deployment of new fibre networks. Utilising these fibre networks allows each mobile base station to link back into the wider core network, however, the requirements in the future are for ubiquitous coverage and this will mean the more complex, more remote locations throughout the country will need further new installations. In addition, 5G offers download speeds far in excess of what can be achieved today, even by fixed line broadband. Such increased speeds and low latency provides the potential for far greater opportunities.

Examples of this new world that will emerge from ubiquitous 5G coverage involves such things as connected and autonomous vehicles, traffic management, smart manufacturing with heterogenous

autonomous machines, direct machine to machine communication, advanced medical devices, automated agriculture, far greater security provision, more stable and reliable connectivity and advances in further application development with uses not yet identified. All of the above provides an insight into the future development of connectivity in our modern world and also provides a further insight into the expected minimum eight-fold increase in data usage by each mobile operator over the next 5-6 years.

6. Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator).

In accordance with the licence obligations and advice in the National Planning Policy Framework and the Code of Best Practice in England the applicant's network rollout team investigated the following siting and design options using this sequential approach to site selection:

- **Upgrading their own existing base stations;**
- Using existing telecommunications structures belonging to another communications operator. i.e. Mast and/ or site sharing, co-location;
- Installations on existing high buildings or structures including National Grid pylons;
- Using small scale equipment; and finally
- Erecting a new ground-based mast site – (1st) Camouflaging or disguising equipment. (2nd) A conventional installation e.g. a lattice mast and compound.

Site	Site Name and address	National Grid Reference	Reason for not choosing
N/A	N/A	N/A	N/A

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

N/A

Notably, as previously stated Paragraph 113 states '*The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate*'.

Additional relevant information

From the outset, it should be appreciated that irrespective of the proposed installation's use as a telecommunications base station, any change in form in the streetscene will always be, to some degree, a noticeable alteration to those residents and regular passers-by found closest. However, it should be recognised that visibility or a development's siting and appearance, does not automatically result in an overwhelming adverse harm.

In light of the above it is considered that the planning assessment of this case should concentrate on whether the effect of the proposed installation in terms of its siting and appearance, when compared to the existing scheme (in situ) would cause harm on the streetscene and whether any harm caused is outweighed by the need for the proposal when balanced against the development plan and other material considerations.

The following assessment of this proposal is based on a comparison of the existing scheme and proposed scheme rather than considering the latest proposal afresh.

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

The Kirklees Local Plan was adopted on 27th February 2019. The Local Plan is now the statutory development plan for Kirklees and supersedes the Kirklees Unitary Development Plan (adopted March 1999). Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.

The Vision for Kirklees includes: *'In 2031, Kirklees will be a great place to live, work and invest in, delivered through an integrated approach to housing and employment. Development will have taken place in a sustainable way (balancing economic, social and environmental priorities) and by making efficient and effective use of land and buildings supported by necessary infrastructure and with minimal effect on the environment. Health inequalities will have been reduced, enabling higher standards of health and well-being resulting from improved access to training and job opportunities, a decent and affordable home, access to services and green spaces and opportunities for physical activity and a healthy lifestyle'.*

This proposal has followed a sequential approach to development and has identified an existing site for a 5G upgrade, rather than a new site is fully in accordance with NPPF. Moreover, Paragraph 38 of the NPPF requires Local planning authorities to work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.

The introduction of 5G technologies to the area will demonstrably improve the social and economic condition of the local area, without unduly compromising the environmental context.

Policy PLP 4 relates to *'Providing infrastructure'*. The policy states *'The council will work with partners to bring forward the necessary and proportionate essential infrastructure that is required in order to deliver the spatial strategy as set out in the local plan. Where new infrastructure is needed to support new development, the essential infrastructure must be operational no later than the appropriate phase of development for which it is needed. Where new infrastructure is needed, the council will expect phasing plans to be submitted as part of planning applications and where appropriate, will link the construction and occupation of that development to infrastructure provision. New development should contribute to the provision of infrastructure, taking account of local and strategic needs and financial viability. This may be achieved on-site or off-site through planning conditions or legal agreements and/or through contributions to the Community Infrastructure Levy (CIL)'.*

Central Government has expressed a support for new telecoms installations and the deployment of new technology. It is seen as essential for the country to develop and exploit the advantages of such new technology to the direct benefit of the public and the economy. It is seen that Local Government is key to the effective deployment of new technology and the upgrading of existing technology. Support and understanding from Local Government is needed to process Planning Applications, to offer the

use of publicly owned assets to locate new equipment and to liaise with Mobile Network Operators in creating the infrastructure required. This is supported by the encouragement the National Infrastructure Commission has indicated in their Connected Future report 2016:

“Local government should actively facilitate the deployment of mobile telecoms infrastructure”.

Connected Future, National Infrastructure Commission 2016

It is suggested that Local Government will directly benefit from new and improved connectivity which will directly improve the local economy, social interaction, improved services, higher productivity and the reduction of social exclusion. The introduction of new infrastructure is required for all of the reasons above but also to prepare the UK for wider and greater advances benefiting from ubiquitous coverage and improved connectivity.

Policy PLP 24 relates to ‘Design’ and states ‘good design should be at the core of all proposals in the district and should be considered at the outset of the development process. Proposals should promote high levels of sustainability through’.

Paragraph 11.7 of the supporting text for policy PLP 24 states *‘All telecommunications infrastructure should be capable of accommodating changes in technological requirements, without having a negative impact on the streetscene’.*

The replacement column will resemble the existing column as closely as possible, subject to technical constraints. These changes are essential to provide the technology upgrade for EE and H3G to ensure that the latest 5G technologies can be provided to this cell area.

The upgraded installation will meet the aspirations of the NPPF which encourages the use of sympathetic design to minimise the impact of the development on the environment as well as the utilisation of existing masts. The proposals have been designed to resemble as closely as possible the existing telecommunications mast already in situ as well as the other linear structures which populate the immediate area.

It is therefore considered that the proposal is fully in accordance with policies PLP4 and PLP24 of the Local Plan.

Other Material Considerations

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The NPPF is pro – development with a **‘presumption in favour of sustainable development’** being seen as a golden thread, running through both plan making and decision taking’.

The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

It is not necessary to quote extensively from this document but the following points are highlighted.

National Planning Policy Framework (February 2019)

The governments National Planning Policy Framework (NPPF) was published on 19 February 2019 and consolidates the majority of planning policy documents into a single circular (including PPG8, and PPS1).

Paragraph 9 of the NPPF confirms that sustainable development is at the heart of the Framework.

Paragraph 11 states:

For decision taking this means:

- approving development proposals that accord with an up-to-date development plan without delay; or
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

The upgraded installation proposed will enable the operators to maintain 2G, 3G and 4G services to area while also providing new 5G services to the surrounding area, forming part of a network of high technology. These services allow home working and working on the move and can reduce the need to travel, thus contributing to the sustainability agenda.

The Government's latest thinking strongly supports communications infrastructure. Section 10 relates to 'Supporting high quality telecommunication'. Paragraph 112 of the framework document sets out the objectives of the Communications Infrastructure. It states that '*advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being*'. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.

The proposed development accords with all these aspects of the NPPF in that it will provide EE and H3G with improved network provision within the WF13 area of Dewsbury bringing a range of associated economic and technical benefits.

Paragraph 113 states 'The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate'.

The proposed upgraded installation is a shared installation and therefore reduces the overall number of installations in the area.

Paragraph 114 states '*Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:*
a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and
b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.

Paragraph 115 states 'Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- a) 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, technical site or military explosives storage area; and
- b) 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 guidelines on non-ionising radiation protection; or
- c) 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.

These points are all covered in section 2 of this Supplementary Information document.

Paragraph 116 confirms that 'Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure'.

An ICNRP certificate forms part of the submittal pack.

Section 12 of the Framework relates to 'Achieving well-designed places'.

Paragraph 124 states 'The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process'.

The design of the upgraded installation is entirely suitable given the context of the site.

Public benefits are defined within the NPPG and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

In order for the UK to benefit from the huge potential of 5G Local Planning Authorities will have to weigh the Public Benefits of such connectivity with the requirements to instruct and manage the built environment. Central Government understands that this may present concerns with the various design solutions proposed but it is important that all Local Planning Authorities understand the technical needs of 5G and better understands the wider advantages of such new technology. This is further emphasised within the National Infrastructure Commission's report in 2016, where National Digital Strategy will be directed through the Economy and Industrial Strategy Cabinet Committee in order to:

"Support and challenge local government in their plans to enable the delivery of digital infrastructure; both in terms of ensuring that these plans help the UK to meet its national objectives, and that local authorities develop consistent approaches to support the deployment of mobile infrastructure across the country". 'Connected Future', National Infrastructure Commission 2016.

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

The Code of Best Practice has been fully revised in 2016 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information super highway no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2013).

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. The Code also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

Section 2 of the Code highlights the Government's Communications Policy and Planning Policy. It acknowledges that the continued expansion and development of mobile networks is a key element of the National Infrastructure Delivery Plan 2016 – 2021. This recognises that digital communications are now a crucial component of everyday life, with improvements in connectivity being key to a vibrant economy (para 2.1).

The proposal will introduce new 5G services to the area. Notably, 5G also integrates the previous generations of mobile telephony through either utilising the existing radio spectrum and/or combining the advantages of previous generations and using multiple platforms to manage coverage and capacity. It is estimated that 5G will directly contribute to an additional £7 Billion a year to the UK economy in just six years from roll-out. Although 5G will undoubtedly bring new opportunities and huge benefits to society, we cannot escape from the requirement that new structures, antennas and ancillary equipment will be needed. But to do so the network needs to be surveyed, designed and planning approval obtained. It has been acknowledged by Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks.

Paragraph 2.2 goes on to state that consumers, businesses and public bodies increasingly rely on mobile communications and expect to receive a signal wherever they are. The Code indicates that recent changes in planning policy [and regulation] are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed.

Section 2 of this Code also reiterates NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth.

Section 3 of this Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time due to changes in technology and associated changes in demand. The Code acknowledges that there remains a reliance on radio masts to provide the main umbrella of coverage. Paragraph 3.1 explains that radio signals operate like light and must “see” over the target coverage area, they cannot be hidden and so there will always be a degree of visual impact.

Paragraph 3.2 clearly indicates that in assessing the visual impact, greater emphasis than previously should now be placed on the radio planning requirements to achieve mobile coverage (as shown in the recent changes to permitted development rights, at the end of November 2016, and the reduced test in the most recent NPPF).

Paragraph 3.3 goes on to highlight that the [operator systems tend to be demand-led or to fulfil coverage obligations. With the ever-increasing demand for data hungry applications available to a range of connected devices, such as smart phones and tablets, the requirement to upgrade and improve networks through changes to existing sites and the development of new sites is constant. As most parts of the country move on to a superfast highway, so the need to bring coverage to ‘not spots’ (i.e. areas where there is no mobile coverage from any operator) and improve coverage in ‘partial not spots’ (i.e. where there is some coverage but not from all operators) intensifies.

Paragraph 3.4 of The Code provides advice to local Planning authorities who are concerned about proposals, stating that they should not ‘look for problems’ but should work proactively with the Mobile Network Operators to find solutions, in line with paragraph 187 of the NPPF.

Section 4 of the Code sets out the evolution of mobile networks from 2G voice calls and text to 4G superfast mobile broadband which are now approximately the same speeds as fixed broadband connection.

Paragraph 4.1 of the Code acknowledges that customer expectations have evolved with technology. The expectation is that they will always be connected and able to access services in exactly the same way as fixed broadband for personal, educational and business purposes.

Paragraph 4.2 acknowledges that data, i.e. using the internet, puts increased demand on capacity and therefore the need for additional base stations to keep abreast of customer demand. Also, 3G base stations, originally using higher frequencies didn’t travel as far and therefore each base station covered a smaller area. However, changes in working practices for the operators, in line with national guidance, streamlining networks, sharing base stations has reduced the overall amount of infrastructure required.

The Code goes on to acknowledge that operators maximise the use of their existing network infrastructure for the provision of 4G services and are similarly upgrading their 3G network infrastructure to improve capacity and coverage. However, the revised Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity needs to be enhanced in line with Government commitments and customer demand.

Similarly, some new sites will be required to replace existing sites that are lost, for example, through redevelopment of an existing building. Some masts may need to be redeveloped or replaced to enable an upgrade in services to take place.

Section 5 relates to mobile connectivity in the 21st Century, explaining that mobile phones and other devices are now everywhere. Mobile connectivity is not just making calls and texts but also mobile broadband. The majority of mobile phones in the UK are Internet-enabled smartphones and large numbers of people also now own tablet devices. People are increasingly choosing to access the internet using a mobile device even when they have fixed broadband connection available.

The Code acknowledges that by the second decade of the 21st Century, the greatest increase in traffic across mobile networks was in data i.e. internet use (para 5.3). Paragraph 5.4 states that in terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5% in the Gross Domestic Product per capita, while another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade.

Section 5 of the Code goes on to highlight that connectivity promotes social inclusion. In recent years, more people rely on a mobile phone than they rely on a landline. Furthermore, people on lower incomes are even more likely to live in a mobile only household, or to access the Internet using a mobile connection (para 5.5).

The Code illustrates that mobile connectivity helps in the delivery of public services e.g. to access Central and Local Government via online services, acknowledging that lives are more likely to be saved when a 999 call is made from a mobile than from a landline, Telehealth is becoming increasingly important and text message reminders also improve compliance with medication and keeping NHS appointments.

Good mobile connectivity also promotes sustainability e.g. it reduces the need to travel and thus carbon emissions (para 5.7). The Code continues to support mobile telecommunications network as it is seen as a crucial piece of national infrastructure in economic, community and social terms (para 5.8).

Paragraph 5.9 states that there is a need to continually upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely. This is driven by increasing consumer demand for data, improved connectivity and more capacity, together with Government aspirations for improving connectivity and coverage.

Section 7 of the Code sets out the need for all agencies to work together to deliver connectivity that is essential to the country's economy and society including Central Government which provides the overall strategy for connectivity, mobile operators to deliver the mobile network development through the planning system and helping to identify land and structures suitable for mobile infrastructure. Local Planning authorities can also ensure that the planning function works in tandem with other relevant departments and agencies such as their own economic development departments and appropriate digital connectivity teams in order to facilitate digital connectivity.

The Code provides guidance on siting and appearance principles at Appendix A. It sets out a number of design principles in respect of telecommunications development. However, the code acknowledges that the options for design used by an operator will be affected by site conditions including requirement to link the site to the network, landscape features and coverage and capacity requirements. The main options for the operator include:

- Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator);
- Installation on existing buildings and structures;
- Erecting new ground-based masts;
- Camouflaging or disguising equipment where appropriate;
- Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage).

The Code in Appendix A acknowledges that it has been a long-standing Government policy objective to support the sharing of masts and sites. Operators also aim to site share wherever viable. If

operators are able to share sites, and install more equipment on each site, this reduces the overall visual impact of network infrastructure, because even though shared sites will tend to be slightly bigger, it means that fewer sites are needed to improve coverage and capacity, infrastructure becomes more feasible, and is more cost-effective to deploy. In fact, sharing of sites is now the norm, and network operators now share much of their network infrastructure via joint venture commercial arrangements.

The Code also provides advice on more sensitive locations including conservation areas and listed buildings. It states that operators may be able to avoid specific locations such as listed buildings, but not an entire protected area. In such cases, they should seek to minimise the impact through sensitive design and appropriate siting of the proposals.

The proposed development is well designed. Moreover, the upgraded installation will enable access to new services in the wider public good which supports ways of working which deliver wider planning, sustainability and quality of life benefits, is therefore in complete compliance with the Code of Best Practice.

National Infrastructure Delivery Plan 2016 – 2021 (2016)

Central Government's Infrastructure and Projects Authority who report to HM Treasury and Cabinet Office have produced a national plan that aims to improve the planning and delivery of infrastructure-based projects and in turn will help to increase investment in the UK and accelerate achieving.

Chapter 7 relates to Digital Communications in which it is said in paragraph 7.1 that *"Digital communications are now a crucial component of everyday life. Technologies such as mobile phones and broadband have revolutionised the way we work, socialise and enjoy our leisure time. Improvements in connectivity mean the UK is rapidly embracing a vibrant digital economy, currently worth around £120 billion a year.¹ Over 30% of UK premises have taken up superfast broadband and there are more than 23 million 4G subscriptions."*

It then goes on to state in paragraph 7.2 that *"Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, open-up access to new markets and support more flexible working practices."*

It is also recognised in paragraph 7.4 that *"Demand for digital services and applications will continue to rise rapidly, with a consequent acceleration in the amount of data being carried over networks. Over the next decade we can expect the emergence of new services, applications and devices which will create additional demands on networks. To support this demand, the UK needs infrastructure that is high capacity, reliable, resilient, secure, affordable and fast."*

It is acknowledged in paragraph 7.10 that *"The government will work to provide greater freedoms and flexibilities for the deployment of mobile infrastructure, including reducing planning restrictions for existing telecoms infrastructure and allowing taller new ground-based masts to be built."*

The National Infrastructure Delivery Plan details key projects and programmes including voice coverage to 90% of the UK geographic area by the end of 2017. With regards 4G rollout it is said that by 2017, 98% of premises should have access to 4G mobile broadband.

DCMS & MHCLG 'Collaborating for digital connectivity' (March 2019)

Ministers from the DCMS and MHCLG wrote to all CEOs of Council's in England setting out its position in respect of supporting investment in high-quality, reliable digital connectivity. The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion. Ministers state:

'It is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. As outlined in the Future Telecoms Infrastructure Review, the Government would like to see nationwide full fibre coverage by 2033. We would also like the UK to be a world leader in 5G, with the majority of the population covered by a 5G signal by 2027. We are writing to ask for your help in supporting the investment necessary to achieve these objectives.'

Recent years have seen substantial investment in mobile and fixed digital infrastructure across the UK.

While mobile coverage across the UK has been significantly improving, there are still too many areas where coverage is poor. The UK has now achieved 95% superfast broadband coverage but still only 6% full fibre coverage.

We need to create the market and policy conditions necessary to support the large-scale commercial investment required to extend and future-proof digital connectivity. A key part of this is making it easier for operators to deploy infrastructure. To help to achieve this, the Government recently reformed the Electronic Communications Code - the statutory framework which underpins agreements between communications network providers and those in both the private and public sector who can provide sites for the installation of network equipment. The purpose of the reforms was to make it easier and more cost effective for communications network providers to deploy and maintain digital infrastructure. Local authorities have an essential role to play as site providers. As Chief Executives, you can support investment in digital communications infrastructure by ensuring your organisations have policies and procedures in place that promote effective engagement with the digital communications industry and minimise barriers to deployment’.

DCMS ‘Connected Growth: A Manual for Places Working to Boost their Digital, Cultural and Social Connectivity’

Digital Infrastructure underpins the digital, cultural and social infrastructures to develop places where people want to live, work and visit. Over the next few decades our digital networks will be the enabling infrastructure that drives economic growth and productivity.

The Digital Infrastructure sector contributed £33bn to the UK economy in 2017 (1.8% of GVA), up by a third since 2010. A core contributor to connected growth in local areas, direct benefits from improved digital connectivity include large increases in download speeds leading to more productive economic activity. It is estimated that by subsidising upgraded infrastructure in certain postcodes £9bn of turnover was added to firms in those postcodes.

A range of evidence shows direct benefits from improved digital connectivity, including large increases in download speeds leading to more productive economic activity. Wider potential impacts are in areas such as remote healthcare, education, travel and transport, and wellbeing, including loneliness. Gigabit- capable technology will ensure future opportunities in these areas, plus technologies such as AI or the Internet of Things, will be available to everyone in every region.

Page 38 states:

‘Designing intervention

Public funding will be dependent on local areas having a clear plan to reduce and remove barriers to deployment and adopting best practice. You should work with providers to support commercial deployment of both broadband networks and mobile coverage infrastructure (in terms of conventional macro-level mast deployment and small-cell deployment at street-level):

- *The Digital Connectivity Portal provides guidance for local authorities and network operators on effective policies and processes to facilitate deployment of broadband and mobile networks.*
- *Introduction to Community-led schemes provides guidance on options’.*

Planning Assessment

The application site is host to an existing 15.0m monopole within the built-up area of Dewsbury, where there is a very high demand for mobile services. The application site is situated to the rear of the pavement on the eastern side of Staincliffe Road, adjacent to Squirrel Hill Covered Reservoir. Immediately adjacent to the site is a boundary wall and 3m high palisade fencing associated with the reservoir. Streetlighting columns and telegraph poles line Staincliffe Road at regular intervals. The existing monopole integrates well with this existing streetfurniture and covered reservoir with associated paraphernalia which form a backdrop to the existing installation. Staincliffe Road is a busy

north south route linking the B6117 and A638, which is primarily residential in nature with pockets of commercial uses.

The site has been chosen as this is the most suitable option, where the principle of development has already been accepted by the Council (2016/91869) and has become part of the established streetscene.

The requirement for the additional and new capacity and coverage for 5G services is urgently required and the operator is complying with the policy guidelines in that they are utilising an existing installation.

Full consideration has been given to alternative sites and existing masts. However, the proposed location and design are considered to be the optimum solution in this instance. As this proposal is an upgrade to the existing radio base station with minimal alterations to the overall appearance of the equipment currently in situ, no other alternative options have been considered. Notably, Staincliffe Road streetworks was a replacement for a previous site at Dewsbury Hospital following a Notice to Quit at Dewsbury Hospital.

The replacement column will resemble the existing mast as closely as possible subject to technical constraints. To this end, the operators have opted for a 20.0m slimline monopole. This open stacked formation is the least intrusive and efficient way of providing 5G connectivity to Dewsbury. Shrouding the antennas would lead to unwarranted inefficiencies and reduce the ability of this site to maximise the opportunity of providing the necessary 5G coverage to the target coverage area.

The upgraded installation will meet the aspirations of the NPPF which encourages the use of sympathetic design to minimise the impact of the development on the environment as well as the utilisation of existing masts. The proposals have been designed to resemble as closely as possible the existing telecommunications mast already in situ as well as the other linear structures which populate the immediate area. The replacement tower will be located to the north of the existing mast already in situ and which has become an established part of the street scene.

The nearest residential property is to the south of the site at an oblique angle, approximately 30m away. To the west, the nearest dwellings are some 50m away on the west side of Staincliffe Road.

It is well understood by town planners there is no entitlement to a view across a third party's land – in this case a view of a slightly taller and wider pole across a wide grass highway verge and busy main road. Planning is carried out in the public interest and it is only when private and public interests coincide can a view across a third party's land, in this case the public highway, which is essentially a private property interest become a material planning consideration. As with views over any adjoining land, that the proposed radio base station may be visible from nearby properties does not equate with harm and cannot normally be regarded as a material planning consideration. It is only when the visual impact of adjoining development, in this case the proposed radio base station, from a principal living room of a nearby property becomes overbearing can it be considered as a material consideration. It is at this point that public and private interests will coincide.

This is normally most common and easiest to understand in relation to two-storey domestic extensions, where loss of view cannot normally be regarded as a material consideration. In particular a view from a first- floor bedroom window can only in exceptional circumstances be considered material, as it is not a principal living room in which residents would normally sit and relax for long periods. However, in situations where the visual impact of the proposed two-storey extension on the view when seen from the principal living room windows of an adjoining property will appear oppressive, for example, when there is serious overshadowing, loss of daylight and sunlight, or proximity of long lengths of two-storey blank flank wall along the common boundary between two properties, it will become a material consideration such as potentially to support other sustainable reasons for refusing permission for the development.

This is certainly not the case at the application site. The existing pole is a congruous feature within the streetscene. A view across a grass highway verge and busy main road, of a slightly taller and wider pole, cannot be said to be in any way overbearing or incongruous and could therefore not be a material planning issue in the determination of this full planning application to upgrade this existing communications site.

This position was confirmed at appeal for a shared radio base station in Barnet. In allowing the appeal for a 20m mast and 4 radio equipment cabinets in its own fenced compound for the operators Vodafone and O2 at Hadley Wood Station, Inspector Fort stated at paragraph 21 of his decision:

'The proposal may be visible from windows of residential properties. However, due to the separation distances achieved between it and the nearest dwellings and its relatively slim profile at higher level, it could not be said to constitute an overbearing structure that would be unduly harmful to outlook. In terms of the proposal's effects on private views, these are matters that the Courts have held can rarely be instrumental in planning decisions, and as such I only attach very limited weight to these considerations in arriving at my decision'.

The proposed development will therefore not appear unduly prominent when viewed from within the immediate vicinity or the wider surrounding area, given its siting, scale and design. Moreover, it is not considered that the increased height of the proposed installation will increase its visibility over and above the existing situation.

The proposed replacement telecommunications mast fully complies with national guidance contained within the NPPF and NPPG as well as policies PL4 and PLP24 of the Local Plan. Government guidance states that in order to limit visual intrusion the number of radio and telecommunication masts and the sites should be kept to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need of a new site has been justified.

The application site is an established telecommunications radio base station. Given that the proposal is to replace the existing site with one capable of allowing the operator to provide enhanced 2G, 3G, 4G services as well as new 5G services from the same site, then this is in accordance with the Local Plan, NPPF and the Code of Best Practice. This offers the best environmental solution, limiting the amount of new sites required in this area. For the avoidance of doubt, the existing column design would not be able to support all the technologies and their feeders as the existing monopole mast is not designed to fit all this equipment within the same structure.

The Government fully supports high quality communications infrastructure. NPPF states 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.

The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections". It is therefore clear that the Government places significant importance on reliable communications and as such the Planning Inspectorate gives significant weight to the public benefit arising from local service provision. The issue of benefits and planning balance is considered in Appeal Ref: APP/L1765/W/18/3197522 Land at junction of Andover Road and Athelsan Road, Winchester. The proposal related to the installation of a 17.5m streetworks pole and associated equipment cabinet at land at the junction of Andover Road and Athelstan Road, Winchester.

The Inspector found at Paragraph 9 *'The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections". In this instance, the proposal is not so much seeking to provide significantly higher standards but to maintain recent local provision of 2G, 3G and 4G services as a result of a notice to quit from a nearby site that was providing these services. The Council has commented that service provision would be 'adequate' without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision'.*

This upgrade fully meets the aspirations of NPPF and NPPG as it will improve the coverage and capacity in this area enabling users of their hand-held devices to be able to continue using their products whenever and wherever they are, enhancing the provision of local community facilities and services benefitting the life of local communities. The upgraded site will ensure that the expansion of the electronic communications network is facilitated and that high-quality communications infrastructure is provided to the immediate area allowing the latest superfast technologies to be provided in the form of 5G services.

The NPPF strongly supports sustainable development as does the Local Plan. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared.

The proposed installation conforms to current government planning guidelines regarding potential health effects arising from telecommunications development. The operator has attached a declaration that the site conforms to ICNIRP guidance. This is in full accordance with NPPF.

The publication of the National Planning Policy Framework continues to highlight the Governments view that the planning system is not the appropriate mechanism for determining health safeguards. It sends a clear message to local planning authorities stating that they 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'. This is reiterated in the Code of Best Practice.

Summary

We consider that the proposals are compliant with both national and local planning policy, whereby the underlying aim is to provide advanced, high quality and reliable communications infrastructure for the benefit of consumers whilst minimising visual impact.

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

The applicant considers that the effect of the proposed installation in terms of its siting and appearance when compared to the existing scheme (in situ) would not cause significant harm on the landscape and any harm caused would be outweighed by the need for the proposal when balanced against the development plan and other material considerations.

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

It has also been demonstrated that the proposed development will cause less than substantial harm, and that this less than substantial harm is far outweighed by the social and economic benefits of the proposal.

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