SITE SUPPLEMENTARY INFORMATION

1. Site Details

Site Name	Wheatley Hill Farm	Site Address	WHEATLEY HILL FARM, CLAYTON WEST, HUDDERSFIELD, HD8 9LG
NGR	E425252 N410245		
Site Ref Number	KIR0002	Site Type[1]	Macro

2. Pre- Application Check List

Site Selection (for New Sites only)
(would not generally apply to upgrades/alterations to existing sites)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	~~Yes~~	No
If no explain why: The Ofcom database was not used as the proposal is for an upgrade to local nearby cells which are able to be consolidated on to the new Icon Tower mast in due course.		
Were industry site databases checked for suitable sites by the operator:	~~Yes~~	No
If no explain why: The Industry databases were not used as the proposal is for an upgrade to local nearby cells which are able to be consolidated on to the new Icon Tower mast in due course.		

Pre-application consultation with local planning authority

Date of written offer of pre-application submission:	N/A	
Was there pre-application contact:	N/A	
Date of pre-application contact (meeting / response / e mail):	N/A	
Name of contact:	N/A	
N/A		

[1] Macro or micro

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	~~Red~~	~~Amber~~	Green
Outline Consultation carried out: In accordance with the Code of Best Practice this site has been given a rating of Green. Existing installations which are being removed as part of this development in the same area, therefore the principle of telecommunications equipment has been established in this area. The proposal is consolidating equipment on to one single shareable mast, a relatively short distance away from the existing site(s).			
Summary of outcome/Main issues raised: N/A			

School/College

Location of site in relation to school/college: The proposal is more than 200m away from any nurseries, schools and colleges.
Summary of outcome/Main issues raised: N/A

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

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

Developer's Notice

Copy of Developer's Notice enclosed	Yes	~~No~~

3. Proposed Development

The proposed site:

About Icon Tower Infrastructure Ltd (Icon Tower)

Icon Tower is a UK based company, headquartered in Lichfield, Staffordshire who provide independent wireless infrastructure sites and equipment and also benefit from being an official Electronic Communications Code ('Code') Operator. It develops infrastructure for all networks to use on an open and non-discriminatory basis. Icon Tower is backed by infrastructure investors and has major plans to invest in digital infrastructure to improve mobile and wireless connectivity in both urban and rural areas. On this basis it provides local communities with the most efficient means to improve connectivity whilst minimising duplicative infrastructure deployments in the future. Icon Tower expects that other mobile operators, rural wireless broadband and other essential networks may also use the mast.

Icon Tower does not operate a retail mobile network of its own and instead gathers Lease Premiums to develop its portfolio of infrastructure for the sole purpose of providing access to all wireless network operators on a shared basis. This is undertaken by Icon Tower Ltd's parent company, AP Wireless. AP Wireless' Investment Portfolio comprises thousands of sites across Europe, Asia, Australia and North and South America.

The four MNOs in the UK, together with over 100 other smaller networks, use Icon Towers infrastructure to deliver a wide variety of services ranging 2G, 3G, 4G and 5G mobile through to fixed wireless broadband, emergency radio services, broadcast and local wireless services.

Icon Tower is committed to the responsible development of wireless infrastructure. Alternative locations are assessed based on strict Town Planning criteria (visual amenity, impact on the local community), balanced against the physical requirements of the mast (radio plan coverage, backhaul line of sight, power and road access). We operate in accordance with the Code of Best Practice on Mobile Network Development (Nov. 2016).

International consultancy Ernst & Young highlighted in a recent report that the independent sector "*can play a valuable role in promoting effective infrastructure use – enabling lower costs, increased coverage for remote areas, and increased retail competition for mobile services*". Ernst & Young further noted that the sector has "*a proven track-record in sharing towers with multiple network operators*" and referenced evidence that independent towers enable 2-3x more connectivity than towers deployed by traditional network operators. (Report on the economic contribution of the European tower sector" March 2015).

Supporting this application will therefore not only secure investment in a high-quality infrastructure asset for the community but also ensure that the mast is deployed by a Code Operator focussed on maximising the use of that infrastructure to enable ongoing improvements to connectivity over the long term.

UK Government Policy on Mobile Infrastructure Deployment.

Mobile telecoms networks are now ubiquitous throughout the UK. It is an expectation that an individual can connect and use their mobile phone whenever and wherever they so require. With the advent of new technology, further advances are proposed, and central government has seen the telecoms industry, and 5G, to be at the forefront of economic development.

The expectations are that future telecom's technology will support government policy regarding digital inclusion; improvements in health and social care; assisting in local economic growth; advancing the development of Smart Cities and supporting innovative uses throughout the transport sector for both personal and public travel.

At the beginning of March 2017 the Department of Culture, Media and Sport (DCMS) issued an updated UK Digital Strategy (UK Digital Strategy) with the goal of ensuring that the UK delivers a *"world-leading digital economy that works for everyone"*. The strategy focuses on seven key strands:

- Building world-class digital infrastructure for the UK
- Giving everyone access to the digital skills they need
- Making the UK the best place to start and grow a digital business
- Helping every British business become a digital business
- Making the UK the safest place in the world to live and work online
- Maintaining the UK government as a world leader in serving its citizens online
- Unlocking the power of data in the UK economy and improving public confidence in its use

The government has noted within the Digital Strategy that the UK lags other similar nations in the delivery of fast, reliable, consistent connectivity for its population, wherever they are in the Kingdom. In conjunction with the new Electronic Communications Code (2018), the DCMS wishes to make it easier for operators to upgrade and share their equipment with other operators to help increase coverage. The DCMS also sees new technology and improved connectivity and coverage as key to the future growth, both socially and economically, of the UK.

Icon Tower is committed to following through on the Government's aims and to responsible development of wireless infrastructure. This submission forms part of private new investment where there is a specific requirement for an upgrade to the existing radio base station at this location to enhance coverage in the area.

Description of the Site

The site is located on a redundant Orange mast base which is located within an agricultural field to the east of Lower Common Lane in the Scissett area. Surrounding the site are agricultural fields which are bound by hedging and semi-mature trees. The areas to the north and west are predominantly residential with more rural areas to the east and south.

Proposed Development

The installation of a new sharable 30m lattice mast which is collocated with an existing mast to the south of the site. The site used has previously been used by orange to operate a mast, so it has been seen to be best practice to reuse an existing telecoms site. The proposed new mast supports 12no. antennas over 2 headframes, 4no. 600mm diameter transmission link dishes, 6no.equipment cabinets, 2.4m high perimeter fence and ancillary development thereto). This is required to facilitate enhanced network coverage for the Mobile Network Operators. This multiuser structure with secure compound

and upgraded power supply will enable a consolidation of equipment and in time lead to the removal of unused infrastructure from the wider site and cell area.

Type of Structure: Lattice Frame	
Height:	30m
Antenna	12no. and light grey in colour
Equipment Housing	6no. cabinets are part of this proposal
Equipment Housing Colours	RAL7035 (Can be changed to alternative RAL colour on request by LPA).
Column/mast etc:	Galvanised
Fencing	2.4m high fencing galvanised finish (alternative RAL colours can be sought on request of LPA)

Reasons for choice of design:

The proposed mast is the lowest height in which the Operators can continue to provide the required level of coverage to the target area. Further options such as a monopole mast were explored, however lattice masts tend to be better suited to more open areas and are capable of supporting multiple operators equipment, helping to reduce the likelihood of additional masts in the future. Icon Tower has subsequently deemed that a lattice structure will be better suited to the site. The proposed mast is suggested to remain galvanised in order to assimilate the typical sky colour in the UK, however the Applicant is open to suggestions from the LPA if they feel that there are any other suitable RAL colours to paint the mast.

For the base station to effectively provide coverage to the target area in line with the established network pattern, specific antenna orientations and heights, determined by Network Radio Planners, must be achieved. The mast height is determined by features of the surrounding area such as existing buildings and trees, the antenna must be able to 'see over' any obstructions in order that they do not block the signals from the antennas. To achieve operator's upgrade requirements the maximum height of the proposed antennae on the mast will be 30m. The size is determined by the technological requirements by the Operator, in order to provide the reliable signal with greater capacity, reliability and lower latency. The antennae are to be finished in the standard light grey finish, which matches the existing antennae on the installation and help reduce prominence when viewed against the sky.

This proposal, coupled with the ability to consolidate nearby existing masts to the site will make an improvement to visual amenity in the area by condensing the potential number of telecommunications sites to one single mast which is much more shareable and future-proofed in comparison to the parvas masts, helping to avoid the proliferation of additional masts in the locality. The applicant is a neutral party which allows other operators to install their equipment on to the proposed to future-proof the site.

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

the site to deliver the capability for an enhanced service for multiple operators from a single network installation.

4. Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) *. 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. 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.	Yes

5. Technical Justification

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

Reason(s) why site required e.g. coverage, upgrade, capacity:
The existing masts cannot support the necessary upgrades. To prevent the proliferation of mast Icon Tower has decided to relocate all existing equipment to one new mast which has the capability for upgrades and the ability to host new and antenna systems and preparing the site for future innovations in telecommunication equipment.

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

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible. New sites are only developed where there are no viable or accessible alternatives. The feasibility of the build and maintenance of the site also needs to be considered. Improvements in telecommunications technology has led to the existing sites nearby becoming unsuitable for Icon Tower, as existing structures cannot support the required upgrades to the existing telecommunications systems. To allow for these upgrades as well as future proofing the site for other potential telecommunication innovations Icon Tower has deemed it necessary to construct a new mast with additional capacity. The 30m in height is required to ensure none of the existing operators lose coverage as the antennas have to be relocated on to two new headframes on the proposed mast. The proposed height is also required to "see over" nearby trees and built form which are particularly problematic when broadcasting signal. As the proposed development is intended to in time replace existing telecommunication installations which are already established feature in the area, the applicant has kept the proposed new telecommunications

mast at a point whereby a wide coverage area can be achieved by operators, while being located in an area which has already been compromised by the development of the quarries and is not pristine. As a result of this an option for a new 30m mast was deemed the best option. As the surrounding area is of rural character a lattice frame mast was considered best practice as it permits views through the structure limiting visual impact.

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

As referred to above, the applicant has taken a sequential approach. It is considered that developing a multi-user, sharable lattice tower is preferable to developing multiple, single user sites in more sensitive areas around Chipping Ongar.

It should be noted that the proposed development is proposing to in time replace existing installations on existing masts which is in full accordance with the Code of Best Practice for Mobile Phone Network Development in England (2022).

Additional relevant information (planning policy and material considerations)

National Planning Policy Framework (2021)

The latest version of the government's National Planning Policy Framework (NPPF) was published in 2021. The Government's policy strongly supports communications infrastructure. Paragraph 114 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. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).*"

It goes on to acknowledge that the numbers of radio and telecommunications masts and the sites for such installations should be kept to the minimum consistent with the efficient operation of the network. Paragraph 116 indicates that local planning authorities should not impose a ban on new telecommunications development.

NPPF paragraph 118 sets out a clear message to local planning authorities on health issues and the need for telecommunications systems. It states that *"Local planning authorities must determine applications on planning grounds 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* ".

Throughout the NPPF there is strong support for sustainable development which is summed up in paragraph 10 which states '*At the heart of the Framework is a presumption in favour of sustainable development*'.

Code of Best Practice on Mobile Phone Network Development in England (2022)

The Code of Best Practice provides guidance primarily to mobile network operators, their agents and contractors and to local planning authorities in England. It is also useful guidance in Northern Ireland, Scotland and Wales too.

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

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

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

- *Placing the mast near similar structures. For example, industrial and commercial premises, road signs and lamp posts*;
- *Placing a mast within or adjacent to an existing group of trees*
- *Using simple and unfussy designs. Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts; and*
- *Appropriate colouring. Masts seen against the sky, for example, are best left in their galvanised state or painted pale grey. Against a wooded backdrop a matt green or brown colour scheme would be more applicable.*

The proposed mast completely supports the National Policies of all four UK Nations by allowing numerous future operators to share one single site, keeping the network to a minimum. The proposed mast has been sited on the land which is in a relative industrial use. The proposed mast is co-located to overhead electricity transmission poles and the proposal has a simple, unclutter design. The proposed mast has been intentionally sited near trees which offer a great level of screening, particularly at the base and lower portion of the mast.

UK government policy on mobile infrastructure deployment

The UK government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks.

"The Government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile devices anywhere they go". DCMS, May 2016.

The last few years have seen a number of UK-wide initiatives to improve coverage including:

- Coverage commitments in the 4G LTE spectrum awarded to Telefonica O_2 (February 2013) to deliver mobile broadband with 98% indoor premises coverage by the end of 2017

- National commitment by all four MNOs (December 2014) to deliver 90% geographic coverage by 2017
- Mobile Infrastructure Project (MIP) – investment by DCMS of up to £150m (to March 2016) in towers to deliver connectivity in complete mobile not-spots.
- Changes to the Permitted Development rights afforded to communications code operators (such as Icon Tower) to allow new networks to be rolled out more efficiently.
- Changes to the Electronic Communications to Code (December 2017) to allow mobile operators to more easily roll-out new communications infrastructure.

Local Policy

The Adopted Development Plan is the Kirklees Local Plan, 2019. There are no specific telecommunication places contained within the plan. The following Policy is relevant to the proposal

Policy LP24

Design

Good design should be at the core of all proposals in the district and should be considered at the outset of the development process, ensuring that design forms part of pre-application consultation of a proposal. Development briefs, design codes and masterplans should be used to secure high quality, green, accessible, inclusive and safe design, where applicable. Where appropriate and in agreement with the developer schemes will be submitted for design review.

Proposals should promote good design by ensuring:

a. the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape;

b. they provide a high standard of amenity for future and neighbouring occupiers; including maintaining appropriate distances between buildings and the creation of development-free buffer zones between housing and employment uses incorporating means of screening where necessary;

c. extensions are subservient to the original building, are in keeping with the existing buildings in terms of scale, materials and details and minimise impact on residential amenity of future and neighbouring occupiers;

d. high levels of sustainability, to a degree proportionate to the proposal, through:

i. The re-use and adaptation of existing buildings, where practicable;

viii. designing places that are adaptable and able to respond to change, with consideration given to accommodating services and infrastructure, access to high quality public transport facilities and offer flexibility to meet changing requirements of the resident / user

h. the risk of crime is minimised by enhanced security, and the promotion of well-defined routes, overlooked streets and places, high levels of activity, and well-designed security features;

i. the retention of valuable or important trees and where appropriate the planting of new trees and other landscaping to maximise visual amenity and environmental benefits; and

Planning Assessment Compliance with Planning Policy

The application site is host to an existing, well-established monopole telecommunications base station and is located within mature woodland which offers a good level of visual screening. There is a very high demand for mobile services in this area and as such is subject to the investment for an upgrade to provide enhanced provision. It has been demonstrated that the site has been chosen as the most suitable option utilising an existing base station site where the principle of development has already been accepted by the Council and has become part of the established landscape and is able to serve the surrounding area, including residents, businesses and visitors to this area, Huddersfield.

The NPPF and the recent correspondence from Government minsters to local authorities clearly highlights the government's positive stance regarding telecommunications and broadband development whilst noting the substantial environmental and social benefits telecommunications can provide. We acknowledge that the authority accepts the importance of telecommunications infrastructure and the NPPF guidance on the this is particularly relevant. The mast is marginally taller and is no hardly any wider than the existing mast, which is already an established feature in the landscape. This is an important consideration in balancing the importance of the telecommunications infrastructure, against visual impact in line with local and national policy. Visual impact will be minimal, particularly as the existing mast is so tall and well screened from public areas such as the nearby road network. The proposed works will not require any increase in the footprint of the compound, therefore there will be no loss of greenspace or wildlife.

Application summary

The development has been designed to be compliant with local policies. The proposal is further justified as the local plan recognises that improvements to allow for a site to have the ability to grow/improve. Additionally, the development is also complemented the proposed development has reduced the possibility of criminal damage such as vandalism has been reduced by the erection of a 2.4m high fence, limiting the ability for anti-social behaviour giving the site a better sense of safety therefore reducing the fear of crime within the locality.

Size, scale, massing, orientation, materials and appearance have all been considered during the design process. The applicant is also allowing the LPA to suggest any alternative RAL colours of the mast structure, fencing and cabinets. The 30m height is required in order to provide coverage to the required cell area. A lattice design was selected as lattice frames allow views through the structure and they are recognised as best practise in rural locations. Visual impact has also been reduced by the choice of colours and materials for this development for example the galvanised finish helps the lattice frame to blend with the sky and reduces its visual prominence where it does break the skyline. The proposed mast has been intentionally sited adjacent to existing semi mature and mature vegetation, offering a good level of screening.

There is a very high demand for mobile services in this area and as such is subject to the investment for an upgrade to provide enhanced provision from a single site. It has been demonstrated that the site has been chosen as the most suitable option, in time, allowing the consolidation of existing equipment on one single mast near to where the principle of development has already been accepted by the Council and has become part of the established landscape and is able to serve the surrounding area, including residents, businesses and visitors to this area.

The National Policy and the recent correspondence from Government ministers to local authorities clearly highlights the government's positive stance regarding telecommunications and broadband development whilst noting the substantial environmental and social benefits telecommunications can provide. We acknowledge that the authority accepts the importance of telecommunications infrastructure and the NPPF guidance. The proposal upgrades telecommunication allowing more and better services to be provided from this tower. This is an important consideration in balancing the importance of the telecommunications infrastructure, against visual impact in line with local and national policy. Visual impact will be minimal, particularly when viewed in the context of what is currently in-situ at the site.

Summary

Taking into consideration all the relevant factors set out above, it is considered that this proposal is the optimum solution in terms of enhanced provision from a single site for multiple operators, minimising any adverse impacts on local amenity. The maximum height of the proposed antennas at 30 metres is the absolute operational minimum to clear the immediate environment and provide coverage.

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

- With specific regard to telecommunications development, the proposal is fully compliant with National Policy the Code of Best Practise on Mobile Phone Development, and Local Policy.
- Site selection was progressed in accordance with advice in National Policy and the Code of Best Practice and represents the least environmentally intrusive, technically suitable, available option;
- The operator's site selection strategy is to keep the overall environmental impact to a minimum where the operator will choose a site with the least impact upon the character of the area utilising an existing site is considered preferable;
- The site is submitted as a Prior Notification, in line with the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2022 which allows up to 30m high ground-based masts to be assessed using the Prior Notification route.
- In this instance, this site is considered to have the least impact upon the character of the local area;
- The proposal fully accords with National and Local Policy and should, therefore, it is respectfully requested that it be approved.

Contact Details

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