Town Planning Statement

5G Electronic Communications Base Station

At the Existing Cellnex Site

Land at Ardsley House Hotel Site
Doncaster Road
Barnsley
South Yorkshire
S71 5EH

Site Reference 225309

CELLNEX AND MBNL

30th March 2022

1. INTRODUCTION

1.1 This statement is submitted in support of an application for prior approval for a 5G mobile base station for the mobile network operators (MNOs) EE Ltd and Hutchison 3G UK Ltd, in conjunction with Mobile Broadband Network Limited (MBNL). The application site is operated by Cellnex, a radio site infrastructure provider.

1.2 The application includes:

- A description of the site and surrounding area
- A description of the proposal
- A statement of community engagement
- A review of planning policy considerations
- A review of design and access considerations

1.3 A number of other accompanying documents have been submitted in support of the application and these are referred to and should be read in conjunction with this statement.

2. THE SITE AND SURROUNDING AREA

2.1 The proposal relates to the upgrading of an existing 22m greenfield monopole with an open antenna headframe above (antenna centre line height 2.4m) and associated ancillary equipment housed within a compound within the site of the former Ardesley House Hotel to the south of Squires Gardens. The proposed upgrade will involve the removal of the existing monopole to be replaced with an upgraded 25m monopole with open antenna headframes (top height 25.2m). In addition to being the sequentially preferable solution, the upgrading of an existing site will fit in within the existing network configuration thereby eliminating the need to introduce additional base stations within the cell search area.

2.2 The existing site has been selected in a position surrounded by commercial development to the north, south and west, capable of providing the required coverage whilst being situated as far away as technically possible from the views of residential properties. The visual effects of the upgraded replacement tower and antenna headframe will be minor and will be a significantly less visually intrusive coverage solution than introducing a new and entirely separate ground-based installation within the locale.

3. THE PROPOSAL

3.1 The development proposed is shown in detail in the drawings submitted and is for a new 5G electronic communications base station. The deployment of 5G will utilise the MNO's existing 3G and 4G networks such as the base station already existing at the application site. As such, the application site is likely to carry different mobile connectivity services in parallel, with high data uses operating through the new 5G higher capacity network apparatus subject of this application.

3.2 Unlike earlier generations of mobile connectivity, 5G has more significant technical and operational requirements and this has implications on the amount, height, position and design of the new base station. To help explain this important detail, we have set this out in the accompanying "**5G Technical Support"** document, which must be read in conjunction with this planning statement.

3.3 The principal elements of the proposed development at the application site reflect these various siting and design factors within the technical support document as illustrated on the supplied drawings**:**

- **Replacement of the existing 22m monopole and open antenna headframe with a new shared 25m monopole with open antenna headframes**
- **The installation of upgraded sector antennas along with ancillary antenna support apparatus**
- **The installation of upgraded replacement transmission dishes along with ancillary support apparatus**
- **The upgrading of existing ground-based radio housing equipment within an existing cabin**
- **The installation of cabling and associated development**

3.4 As necessary, any uncontaminated earth and materials excavated will be reused for fill and levelling.

3.5 The radio equipment housing will need to be mechanically ventilated to avoid overheating of equipment. The ventilation equipment is only likely to operate during

the day during hot weather. If it is considered specific noise attenuation measures to be necessary, we would be pleased to discuss practicable solutions.

3.6 Section 6 of the Code of Best Practice on Mobile Network Development in England, published in November 2016, explains how mobile networks operate. In the annual network rollout information supplied, the operators will have explained their network requirements for 5G and the anticipated use of existing sites, including those owned by site infrastructure providers like Cellnex.

3.7 The application site has been selected by the operator as this will provide the required level of 5G network coverage while properly meeting national town planning policy objectives for the shared use of existing electronic communications masts and sites, in this case operated by Cellnex.

4. PRIOR ENGAGEMENT

4.1 The recently revised National Planning Policy Framework (NPPF) and the Code of Best Practice on Mobile Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received an amber rating when assessed against the traffic light rating model (see Appendix B of the Code of Best Practice).

4.2 The pre-application consultation in relation to the application site was undertaken with your Authority and Ward Councillors (Andrew Gillis, Janine Bowler and Karen Dyson). At the time of submission there has been no response to this pre-application consultation and accordingly we would be pleased to address any necessary matters within the determination period of the application.

5. PLANNING POLICY

5.1 The relevant planning policy and best practice framework is found principally within:

- National Policy, especially the National Planning Policy Framework (NPPF)
- The local policy framework set out in the adopted Development Plan;
- The Code of Best Practice on Mobile Network Development in England.

5.2 From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development. As planning authority, you will be familiar with this framework and so in the interests of brevity, we do not rehearse it back to you in detail but address instead the principal themes to demonstrate that the application accords with them.

National Support for Modern Communications

5.3 There is significant UK Government support for the delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. Our accompanying document of national policy '***National Policy - Delivering Ultra-Fast Broadband Mobile Connectivity'*** sets out how 5G mobile connectivity will underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. To deliver improvements to existing services and supporting future mobile technologies, it is essential that the planning system looks to support and facilitate new 5G base station installations such as that proposed to meet the Government's Digital Strategy. In addition, modern connectivity, such as 5G, will be essential to help the Government meet its wider sustainability and climate change targets and we explain this in more detail in our accompanying document '***5G – Helping tackle climate change'***.

Balancing operational and environmental considerations

5.4 The special operational and technical factors that require specific siting of a 5G base station should be balanced by the need to minimise environmental and visual impact.

5.5 However, paragraphs 3.2 – 3.3 of the Code of Best Practice explain that there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs for 5G, the Code of Best Practice emphasises that the NPPF now applies a reduced policy test compared to previous guidance. This helps to clarify that an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.

5.6 In balancing these requirements, the starting point for the 5G networks or the expansion of existing networks is to use existing electronic communications sites owned by other operators or radio site management companies such as Cellnex. This policy objective is backed with the statutory obligation placed upon operators to share apparatus, where practicable out under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.

5.7 A replacement mast is required in this instance as the existing mast design is structurally incapable of supporting more radio apparatus for 5G. The development entails the use of an existing site owned or managed by Cellnex which is in operational use and where a mast is already an established feature of the site and wider landscape. Within this context the replacement mast will be seen as an acceptable and justified use, reflecting all of the considerations within paragraphs 114 - 118 of the NPPF and:

- The 5G base station is required as part of a national mobile communications network, necessary to extend and improve mobile connectivity to the local area;
- The target coverage area has been explained and consequently the special operational and technical requirements necessitate siting of a mast within it;
- All reasonable steps have been taken, through careful siting at an existing Cellnex communications site, to moderate the visual impact of the

development, having regard to technical and operational factors. In this case, the replacement of an existing mast now an established and accepted feature within the landscape;

- The proposal to share this existing communication site, through the installation of a replacement, looks to strike the optimum solution, particularly when compared with the alternative of erecting a new base station elsewhere and the development of an associated compound on a site nearby and with it the associated additional resources in developing a new site.

5.8 The replacement mast requires prior approval, as the operational needs and associated design of the mast means that it falls outside the relevant width and height limitations of outright permitted development pursuant to the Town and Country Planning (General Permitted Development) (England) Order 2015 (the 'GPDO'), as amended most recently on the 24th November 2016. However, the relaxation of permitted development rights within the Amendment Order clearly reflects the Government's strong emphasis towards the reuse and redevelopment of existing electronic communications installations to minimise the need for further structures elsewhere and this proposal clearly follows the emphasis within that particular guidance. The availability of permitted development rights to replace the existing structure must be a material consideration in the determination of the application (and as a 'fall-back' consideration).

5.8 As a matter of principle, the development proposed is in accordance with the relevant policy framework and should therefore be acceptable. In the next section, the Design Considerations are reviewed to demonstrate that the detail of the development is also acceptable and that in accordance with the presumption in favour, planning permission should be granted.

Local Policy Considerations

5.9 At local level, the proposal has been considered against the Barnsley Local Plan (Adopted January 2019) Policy D1 High Quality Design and Place Making and Policy GD1 General Development.

Policy D1 High Quality Design and Place Making states:

Design Principles:

Development is expected to be of high quality design and will be expected to respect, take advantage of and reinforce the distinctive, local character and features of Barnsley, including:

Landscape character, topography, green infrastructure assets, important habitats, woodlands and other natural features;

Views and vistas to key buildings, landmarks, skylines and gateways; and

Heritage and townscape character including the scale, layout, building styles and materials of the built form in the locality.

Through its layout and design development should:

Contribute to place making and be of high quality, that contributes to a healthy, safe and sustainable environment;

Complement and enhance the character and setting of distinctive places, including Barnsley Town Centre, Penistone, rural villages and Conservation Areas;

Help to transform the character of physical environments that have become run down and are lacking in distinctiveness;

Provide an accessible and inclusive environment for the users of individual buildings and surrounding spaces;

Provide clear and obvious connections to the surrounding street and pedestrian network;

Ensure ease of movement and legibility for all users, ensure overlooking of streets, spaces and pedestrian routes through the arrangement and orientation of buildings and the location of entrances;

Promote safe, secure environments and access routes with priority for pedestrians and cyclists;

Create clear distinctions between public and private spaces;

Display architectural quality and express proposed uses through its composition, scale, form, proportions and arrangement of materials, colours and details;

Make the best use of high quality materials;

Include a comprehensive and high quality scheme for hard and soft landscaping; and

Provide high quality public realm

In terms of place making development should make a positive contribution to achieving qualities of a successful place such as character, legibility, permeability and vitality.

Policy GD1 General Development states:

Proposals for development will be approved if:

There will be no significant adverse effect on the living conditions and residential amenity of existing and future residents;

They are compatible with neighbouring land and will not significantly prejudice the current or future use of the neighbouring land;

They will not adversely affect the potential development of a wider area of land which could otherwise be available for development and safeguards access to adjacent land;

They include landscaping to provide a high quality setting for buildings, incorporating existing landscape features and ensuring that plant species and the way they are planted, hard surfaces, boundary treatments and other features appropriately reflect, protect and improve the character of the local landscape;

Any adverse impact on the environment, natural resources, waste and pollution is minimised and mitigated;

Adequate access and internal road layouts are provided to allow the complete development of the entire site for residential purposes, and to provide appropriate vehicular and pedestrian links throughout the site and into adjacent areas;

Any drains, culverts and other surface water bodies that may cross the site are considered;

Appropriate landscaped boundaries are provided where sites are adjacent to open countryside;

Any pylons are considered in the layout; and Existing trees that are to remain on site are considered in the layout in order to avoid overshadowing.

5.10 In accordance with the relevant Barnsley Local Plan Policies, the proposal is for the upgrading of an existing shared base station thereby eliminating the need for new and entirely separate installations to provide the required essential 5G coverage and improved 2G / 3G / 4G coverage and capacity. In line with the requirements of the policies detailed above, it is considered that the proposed upgrade of a shared facility will not overly intrude into the locality and any associated visual impact will not outweigh the continued need and future demands to provide coverage to the surrounding area.

5.11 The provision of upgraded 2G / 3G / 4G and new 5G coverage accords with the importance the Barnsley Local Plan places on Economic Infrastructure. The introduction of a 5G network will provide key infrastructure that will enable this area to be adaptive to modern day business requirements thereby helping to ensure the businesses and communities within are provided with the essential communications infrastructure to remain sustainable and secure economic growth.

5.12 In accordance with the requirements of Policy D1 Design Principles and GD1 general Development seeking to minimise the visual impacts associated with development the upgrading of the existing installation will be a considerably less visually intrusive coverage solution than introducing a new separate ground based or rooftop base station. The visual effects have been further reduced by keeping the height and bulk of the replacement monopole down to the absolute minimum capable of achieving the required coverage. It is also worth stating that the ancillary equipment enclosure upgrades will be out of sight at ground level within the existing equipment cabin.

5.13 The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operators and minimising environmental impact.

6. DESIGN CONSIDERATIONS

6.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended. However, to assist your consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations. Due regard has been given to the factors listed in Appendix A of the Code of Best Practice.

Physical Context

6.2 The proposed upgrade site has been carefully selected in a position benefitting from the screening effects associated with a block of woodland extending to the south and east. It should also be noted that the upgrading of a shared existing facility has eliminated the need to provide two new and entirely separate additional base stations within the target coverage area.

6.3 The upgrade will require the removal of the existing 20m monopole to be replaced by an upgraded 25m monopole and open antenna headframes to a top height of 25.2m. Whilst it is acknowledged that there are residential properties within the vicinity the upgrading of an existing site set against a screening backdrop of mature tree planting represents the least visually intrusive option available within the cell search area. It should also be noted that the proposed coverage solution involving the upgrading of an existing, established telecommunications installation will be a considerably less intrusive solution than introducing an entirely new and separate base station within the locale.

6.4 Whilst it is acknowledged that the upgrade will require a replacement monopole and antenna headframe, the height and bulk of the proposed upgraded equipment has been kept down to the absolute minimum capable of providing the required improved coverage.

Amount, Design, Layout and Scale of the Development

6.3 The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide coverage to the local area, having regard to the need to minimise visual impact, already referred to above

explained in detail in the ***'5G Technical Support'*** document. With regard to the main component elements of the development proposed:

- The design of the proposed upgrade to the existing mast has been led by operational and technical factors associated with the provision of 5G coverage. In addition to being the sequentially preferable solution the upgrading of an existing facility will fit in within the existing network configuration thereby eliminating the need to introduce additional base stations within the cell search area.

- The required upgraded equipment cannot be hidden within the existing mast structure / compound, but any impacts on the landscape and visual amenity will be limited and moderated by confining height to what is required for operational reasons. Compared to other forms of vertical infrastructure also found in the landscape, the visual effects of proposed removal and replacement of an existing monopole and additional antenna headframe will be relatively minor: the existing and proposed replacement monopoles are much lower than the television broadcast masts owned and operated by Arqiva; it is lower and does not form a string of structures that march across the countryside like pylons; and it does not move like wind turbines, which are typically higher and are usually developed in clusters.

- Alternative designs like shareable tree masts have been considered, but they cannot accommodate the amount of apparatus necessary to support 5G. Even if a tree mast could be designed to support such apparatus, it would still amount to an engineering solution unlikely to replicate the natural features and character of a tree and would appear as a prominent and incongruous feature in the wider landscape.

Antenna Array

- The numbers of antennas and dishes and their size has been kept to the minimum necessary to provide coverage and to link this site back into the operator's 5G network. The design of these features is very much driven by operational and technical factors.

Equipment Cabinets

- The number of radio equipment cabinets and their size has been limited to what is required to meet the operator's current and foreseeable

network requirements. The location and design of the equipment cabinets, and the electronic communications equipment housed within them, reflects their functionality and the technical and operational requirement to be in reasonable proximity to the antenna systems and dishes that they support. This avoids exceptionally large runs of feeder cables and associated supporting trays, and the subsequent loss of signals.

Access Considerations

6.4 Access to the site will be provided from the existing access route and the site benefits from off street parking in close proximity to the compound. The existing installation has been sited away from the highway and pavement area in a position that will avoid impeding pedestrian flow or the safety of passing motorists.

6.5 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.

6.6 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Landscaping

6.7 The proposed siting of the development has been very carefully chosen to minimise environmental impact. Any potential impact of the development is principally associated with radio mast, which is the most visible component of the base station, and which cannot be fully screened for operational reasons. The height of the mast means that any attempt to screen it in its entirety would be unrealistic in any event.

6.8 Views towards the existing site are well screened from the south and east by surrounding tree planting which will mitigate its impact in views from public vantage points nearby.

At ground level, the compound will be set amongst existing natural screening that will minimise its visual impact. For this reason, additional landscaping is not considered appropriate and has not been included within the scheme.

Appearance

6.9 The sensitive approach to siting and design should minimise the appearance of the development proposed. In addition, as indicated above the local topography and natural features should help minimise views. Insofar as the mast and compound may be visible, they should look straight forward in appearance and reflect their function. To that extent they should in time become accepted features of the local environment as with other forms of communications networks and essentially public utility infrastructure, such as roads and railways.

7. HEALTH AND SAFETY

7.1 In support of the application, we include a separate document called ***'5G Health and Safety'*** which sets out in more detail the associated health and safety considerations. Every installation on a site owned or managed by Cellnex will be compliant with international standards adopted by the UK Government. A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.

7.2 The ICNIRP guidelines seek to protect against the well-known thermal effects of radio emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.

7.3 National planning policy remains clear, provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines through the refusal of planning permission.

8. SUMMARY AND CONCLUSIONS

8.1. In summary, the application is in respect of electronic communications base station necessary to improve a vital network that provides public services.

8.2. The service provided by the operator is in the public interest and is in very high demand with 5G being the next and highly significant advancement in mobile connectivity. In the UK there are now more than 92.5 million subscriptions to mobile networks and mobile services now exceed fixed landlines in terms of customer numbers and usage.

8.3. The public interest of the system is clear from the considerable benefits that will flow and it makes a significant and major contribution towards sustainable objectives.

8.4. The operator's requirement is in the context of network needs associated with a 5G cellular system. These impose particular locational and siting requirements which are even greater with 5G. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.

8.5. The operator has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:

- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Cellnex.
- Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
- Engagement in accordance with the Code of Best Practice procedures.
- An examination of design options to try and minimise potential visual impact.
- The replacement of an existing radio mast compared with the alternative of erecting a new mast and the development of an associated compound on a site nearby and with it the associated additional resources in developing a new site.

8.6. The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.

8.7. This statement and the other accompanying material has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in particular within the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.

8.8. In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one which the presumption in favour of granting approval applies.