



**SUPPLEMENTARY INFORMATION IN SUPPORT
OF
APPLICATION FOR PLANNING PERMISSION**

April 2019

**On behalf of
MBNL, EE (UK) Ltd and Three (UK) Ltd**

Site Ref. MBNL: BAR059, Fosters Bakery

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Fosters Bakery	Site Address:	Fosters Bakery Ltd, Towngate, Mapplewell, Barnsley, South Yorkshire, S75 6AS
NGR:	E 432765, N 410003		
Site Ref Number:	MBNL, BAR059	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	No
If no explain why: N/A		
Was the industry site database checked for suitable sites by the operator:	Yes	No
If no explain why: N/A		

Pre-application consultation with LPA

Was there pre-application contact:	Yes	No
Date of pre-application contact:	18/02/2019	
Name of contact:	N/A	

¹ Macro or Micro

Summary of outcome/Main issues raised:

A consultation letter and associated plans were sent to Barnsley Council on 18/01/2019.

A Planning Officer replied to the consultation on 18/02/2019. The Officer advised that the authority had concerns about the scale of the proposed mast and the resulting visual and residential impact.

In response to these comments, an alternative mast design is the subject of this application. The mast now proposed is considerably smaller in scale, particularly with respect to width.

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline Consultation carried out: The proposal was rated as Amber in accordance with guidelines set within the Code of Best on Mobile Network Development (published 2016). Accordingly, pre-application consultation was also undertaken with the Ward Members for Darton East.			
Summary of outcome/Main issues raised: At the time of writing, no consultation response had been received. Lines of communication will remain open throughout the application process.			

School/College

Location of site in relation to school/college: No schools were identified as being located near to the site.
Outline of consultation carried out with school/college: N/A
Summary of outcome/Main issues raised: N/A

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

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

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	15/04/2019	

3. Proposed Development

The proposed site:	
The application site is set within the grounds of a food processing and distribution site operated by Fosters Bakery. The site accommodates multiple operational buildings with associated plant and carpark areas. Surrounding land uses comprise a mixture of retail, residential and community facilities. The site presently accommodates multiple pieces of telecommunications apparatus within a fenced compound. This includes a 15m high lattice-tower accommodating radio antennas, and equipment housing cabinets at ground-level. Collectively this apparatus forms a base-station providing mobile communication services to customers on the Everything Everywhere and Three networks.	
Type of Structure:	
Description: Replacement of 15m high tower and 3No. equipment cabinets with a 20m high tower supporting radio equipment and 9No. equipment cabinets at ground-level, plus ancillary works.	
Overall Height:	
Height of existing building:	N/A
Equipment Housing:	
8No. equipment housing cabinets of modest size will be located behind proposed palisade fencing forming a modified site compound. Cabinets shown on proposed site plan.	
Materials:	
Tower/mast etc – type of material and external colour:	Mast to be galvanised-steel finish, same as existing.
Equipment housing – type of material and external colour:	Equipment cabinets would be coloured green or grey and would be located behind fencing.

Reasons for choice of design:

The replacement antennas are larger in size, weight and in number than the existing due to their higher technical capability. The existing mast does not have the capacity to accommodate the increase in equipment, hence the proposed replacement high-capacity structure. This has factored the increased structural loading caused by the replacement equipment.

In the same regard as the existing, the replacement antennas must be allowed to unrestrictedly emit a radio signal meaning they need to be sited at a high position to ensure the radio signal clears all other surrounding structures, such as buildings and trees, with the aim of avoiding signal interference. The larger size of the replacement antennas also necessitates the need for them to be elevated at a higher position.

In the short term, the replacement antennas will have improved capacity to more consistently provide 4G services to more people at the same time. This will include higher mobile down-load speeds and more reliable mobile phone connections. The support structure has also been designed to accommodate emerging 5G technology which will have ultra-fast mobile connectivity and will be capable of operating the 'Internet of Things'. The site is being future proofed.

The consequence of these improvements is that there is requirement for a structure which can accommodate a higher number of larger-scale antennas. Each of the operators (EE & Three) require 3No. antennas per service they provide, so therefore 3No. antennas X 2 services (4G & 5G) requires 6No. antennas. This equates to 12No. antennas accounting for both operators.

The higher spec antennas have a wider safety exclusion zone which necessitates elevating the antennas higher than the existing to ensure that surrounding buildings are not in the zone. The above factors have informed the scale of the proposed replacement mast which is the minimum height possible while still meeting structural, radio planning and public safety requirements.

The proposed equipment cabinets would be located within a modified fenced compound for increased security. The cabinets need to be sited reasonably close to the antennas that they will serve in order to avoid impractically long cable feeds and the associated electrical losses. The cabinets would be largely screened from view in the same regard as the existing.

Service personnel would continue to access the site via existing highways and there would be no need for additional carpark spaces.



Fig 1. Existing mast to be replaced.



Fig 2. View from edge of site compound towards housing.

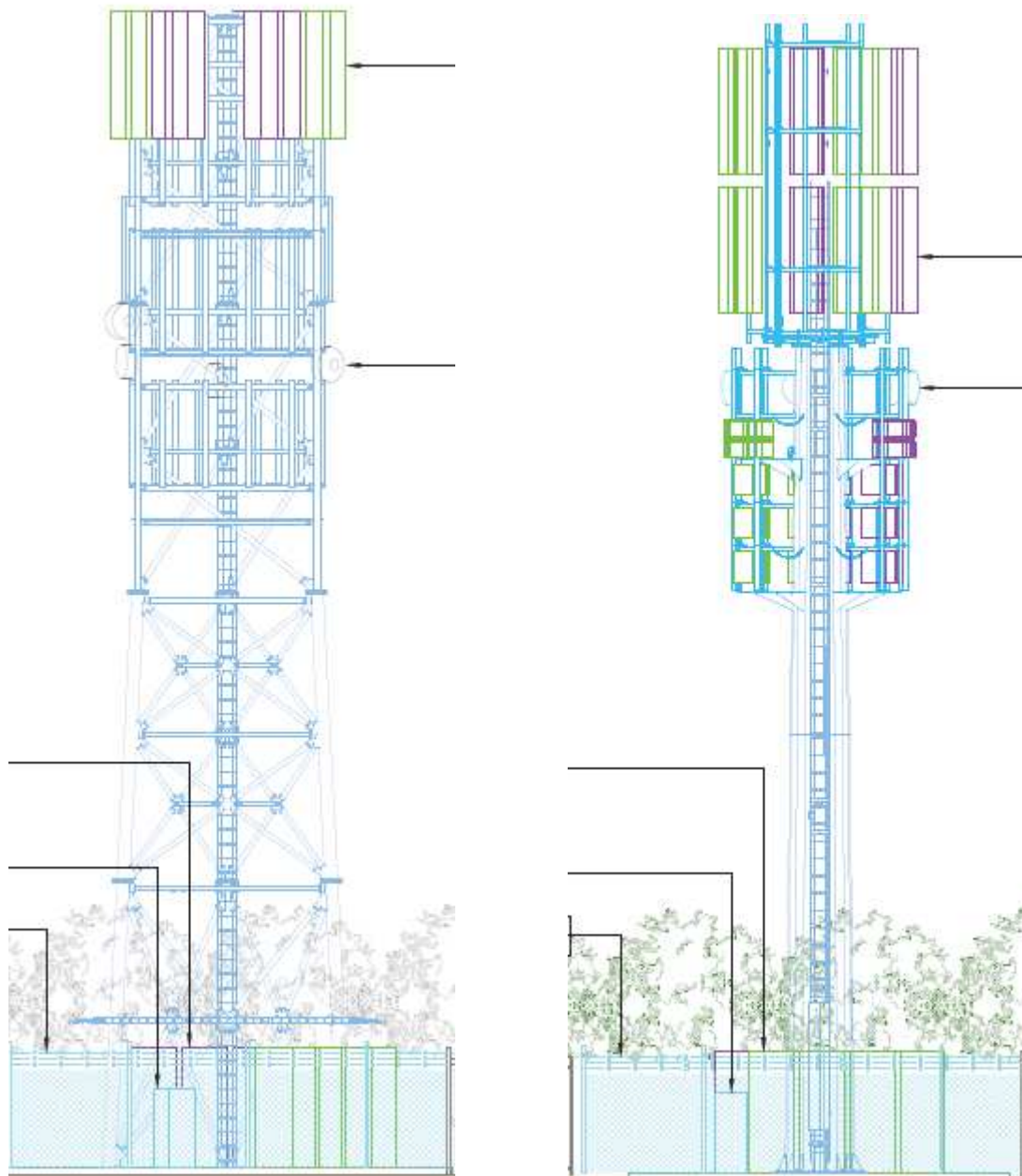


Fig 3. Comparison of originally proposed lattice tower vs. newly proposed monopole structure.

4. Technical Information

	Yes	No
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 Three (UK) Ltd operate their networks in such a way, that the radio frequency power outputs are kept to the lowest levels to commensurate with effective service provision. The proposed telecommunications infrastructure, which is 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. Technical Justification

Reason(s) why site required e.g. coverage, upgrade, capacity:
MBNL is a joint venture owned by EE (UK) Ltd and Three (UK) Ltd. MBNL undertakes the management and network deployment of telecommunications sites on behalf of both EE (UK) Ltd and Three (UK) Ltd. 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, under the banner of 5G, further advances are proposed and central government has seen the telecoms industry, and in particular 5G, to be at the forefront of economic development. The expectations are that future telecoms 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. In addition, EE (UK) Ltd will be supporting the communications requirements of Emergency Services where further rollout and improvements in the 4G signal is currently being progressed. 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 government has noted within the Digital Strategy that the UK lags behind 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 in order 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.

The proposed new installation and upgraded equipment provides the latest technology and the ability to prepare for new technology such as 5G. At the heart of the new legislation, and one of the Government's key aims, is to deliver on the public benefit of having access to a choice of high quality electronic communications services.

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

Relocating an operational mobile base-station to an alternative site is problematic. The mobile operators have invested considerable resource in securing the legal rights to install equipment at the current site. Likewise there has been a high level of investment in existing infrastructure that the upgraded base-station will connect to, such as electrical cabling and grid connection. This would call into question the viability of relocating.

The other significant obstacle is related to radio planning. A replacement site would need to be within 100m distance of the current site. This is because the operational base-station forms part of a nationwide radio network and establishing a replacement site beyond this radius would result in gaps in radio coverage i.e. coverage black spots.

When installing a new ground-based mast, there is a set of criteria that a site must be assessed against to ensure effective operation, this includes:

- Sufficient size plot of land to accommodate apparatus and compound;
- Apparatus not causing highway safety issues;
- Viable option for a grid connection to receive power;
- Presence of underground services preventing ground excavation;
- Potential for nearby trees and high-buildings to corrupt radio signal;
- Protection of visual and residential amenity

The small size of the search area, coupled with the fact the wider area has predominantly residential land use, means that there is no obvious alternative sites that would be more preferable to the existing.

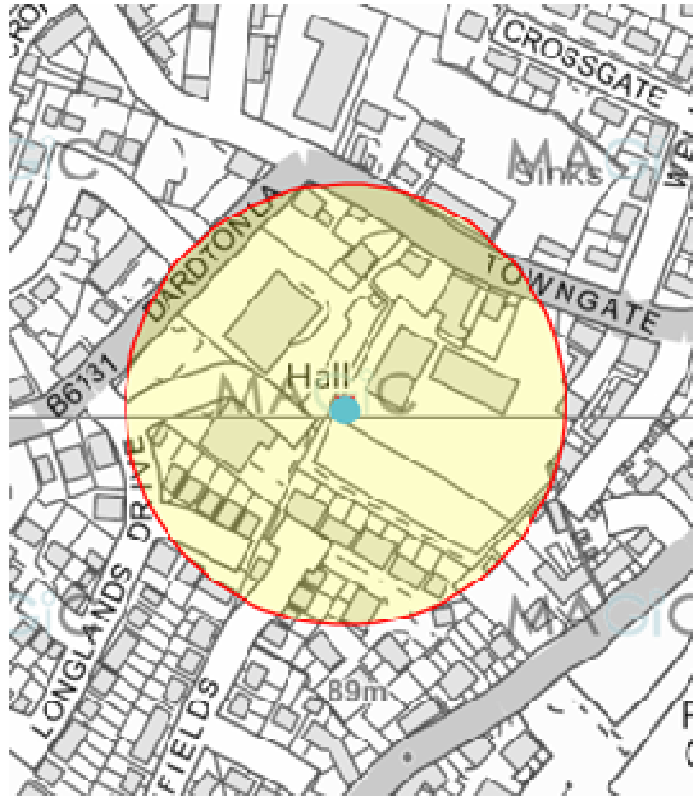


Fig 4. 100m radius from existing site.

Land use planning designations:

Development Plan

The application must be determined in accordance with the authority's statutory development plan which comprises the Barnsley Local Plan and Policies Map (adopted January 2019). The policies map informs that the site falls within land allocation 'District or Local Centre – Area of shops and services' (Mapplewell, local centre).

As such, the following policy is relevant:

'Policy TC1 Town Centres

Support will be given to maintaining and enhancing the vitality and viability of the following hierarchy of centres...

The Local Centres serve smaller catchments and development here will be expected to meet the needs of the local area and not adversely impact on the vitality or viability of other nearby centres.'

The following sections from the local plan are also relevant:

'Vision and objectives

*There is clear intention to **enhance Barnsley as a location to do business** and a place that will improve the quality of life for residents.*

*To achieve this Barnsley's Local Plan will provide the spatial framework within which we can deliver substantial and sustainable **economic growth** for the borough, as well as Leeds and Sheffield City Regions and the Northern Powerhouse, that also respects the **needs of local communities**. The Local Plan objectives seek to improve the economic prosperity and quality of life for all its residents and those who work here...*

To be achieved by:

*Providing the opportunity to **grow the economy by 28,840 jobs***

*Encouraging significant **inward investment** to generate this additional employment*

*Providing the space to allow existing **businesses to grow***

Creating a vibrant and attractive Town Centre

*Enabling the **delivery of at least 21,546 homes** that provide housing for all, including affordable*

housing, and maintaining at least a rolling 5 year deliverable supply of new housing

*Enabling the provision of **critical infrastructure** to support sustainable communities*

Protecting and enhancing the natural, built and historic environment'

'Policy UT2 Utilities Safeguarding

Existing services and utilities including major pipelines, transmission lines, distribution mains, sewerage and sewage treatment works, land drainage systems and water resources, together with associated equipment, installations and operational land, will be protected from development that will detrimentally affect them.'

'Policy I1 Infrastructure and Planning Obligations

*Development must be supported by appropriate physical, social, economic and **communications infrastructure**, including provision for broadband.*

*It is important to ensure that development is adequately supported by appropriate infrastructure, whether existing or new... New development will create **additional demands on existing infrastructure** and where spare capacity may not exist, there will be a need for new infrastructure to ensure it functions satisfactorily. (para 25.1)*

*Investment may also be required to ensure the local economic infrastructure can accommodate the new development including shopping facilities and the availability of suitably skilled labour to support economic regeneration. New forms of infrastructure are also relevant including **communications technology**, it is **particularly important** to ensure provision for Superfast Broadband. (para. 25.3)'*

Proposal Assessment

Landscape and visual

In considering the development proposal, a key consideration is the balance of protecting the visual amenity of the surrounding area, and the amenity of local residents, while also enabling the economic growth ambitions for Barnsley to be suitably served by the latest electronic communication services.

It is assessed that the principle public viewpoint towards the site is from Darton Lane when travelling north. The replacement mast, in the same regard as the existing, is unlikely to be highly visible from other locations because of the presence of buildings and vegetation creating a screen. This includes views from Darton Lane when travelling south.

In relation to views from Darton Lane travelling north, views of the mast would be of a transient nature and only partial views of the upper-section of the mast because of the presence of the building immediately in front. Tree planting also serves to partially screen the structure. The views would be indirect because the site is set back from the road and not in commuters' direct line of sight when commuting in either direction on the road. The structure would only be in view for a short period of time and the number of visual receptors would be moderate.

The mast would be viewed in the context of the bakery's processing plant, including steel flues, and in the context other steel structures of a vertical and utilitarian appearance, such as street-lighting columns. It is considered that the magnitude of visual change would be moderate.

It should also be recognised that the presence of radio equipment has been a long-term feature of the local landscape and that the upgrade proposes a *replacement* structure that is of similar form and appearance to the existing, only larger in scale. The replacement structure should continue to integrate into its setting.



Fig 4. View towards the site from Darton Lane (travelling north).

Residential amenity

In terms of residential amenity, it is assessed that the nearest residential dwellings are located at Sparkfields. A combination of separation distance from these dwellings and the site, and the presence of tree planting which provides a high degree of screening for the dwellings located directly in-line with the site, means that the replacement mast would result in only a moderate change in outlook from the windows of these properties.

It is relevant that while the mast would remain visible to a small number of dwellings that do not have the benefit of tree planting, these dwellings do not have a near or direct view of the site. They are off-set. These dwellings would also be among those to benefit from the upgraded communication services.

Material Benefits

The upgraded base-station would have increased capacity to meet the demands of a growing town, for both businesses and residential communities, providing improved and more reliable services. The upgrade would also make the site 5G ready, delivering notable economic and social benefits such as ultrafast mobile connectivity and improved social inclusivity.

When the site commences the provision of 5G services, the surrounding area would have the infrastructure to facilitate the 'Internet of Things'. This is the principle of connecting devices over the internet to support smart homes and smart cities. For example, connecting home heating systems to our smart phones or enabling the operation of autonomous vehicles – all contributing to a more sustainable way of life.

The proposal would directly support Barnsley in realising its vision to *'enhance Barnsley as a location to do business and a place that will improve the quality of life for residents'*. Access to communication services is now recognised as an essential infrastructure provision for new development, both in economic and social contexts. For Barnsley to attract new business, residents and general investment, it must be able to compete with other towns and cities which means having equal access to the latest communications services.

Policy I1 recognises that increased development, both employment related and the objective to deliver at least 21,546 new homes, will put increased strain on infrastructure including communications technology, and the upgrade of this base-station would increase its capacity to meet current and future demand for services.

Furthermore it is material that the base-station would help to secure the long-term economic viability and therefore maintenance and appearance of this site by way of a continued rental income provided by the mobile operators.

The development plan is unambiguous in its support the provision of new infrastructure. This proposal would see an existing piece of telecommunications infrastructure upgraded to enable provision of the latest electronic communication services. The upgraded structure would be shared by the two mobile operators EE and Three, avoiding the need for each operator to establish independent sites and thereby minimising environmental intrusion. In summary, it is considered that the benefits of the proposal outweigh the resulting visual changes.

Additional relevant information:

National planning policy and strategies are material in determining planning applications and in this case provide strong support in favour of the proposal.

National Planning Policy Framework – Supporting high quality communications

The NPPF, para. 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.'*

Para 113 continues:

*'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.***

Para 116 clarifies 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.'

UK Digital Strategy

In March 2017, the UK Digital Strategy was published by the Department for Digital, Culture, Media & Sport. The strategy is directly relevant to this proposal...

*'**Broadband and mobile must be treated as the fourth utility**, with everyone benefiting from improved connectivity. This will play a crucial role in ensuring that everyone, wherever they live and however they connect, can make full use of digital services and **benefit from participation in the digital economy**. Improved connectivity also **increases innovation and productivity across the economy, bringing significant economic rewards**'*

*'**5G is the next generation of mobile connectivity**, and is currently in development. It is expected to represent a significant upgrade: providing **ultrafast, low latency, and more reliable mobile connectivity**, able to handle our ever-increasing data requirements. This should present **huge opportunities to boost productivity and grow the economy**. In addition to giving consumers and business users high quality connectivity, it will also support the development of the **Internet of Things: the rapidly-increasing number of connected devices, from connected cars to digital health applications.**'*

Conclusion

The proposed upgrade of this mobile base-station would provide the latest communication services for surrounding businesses and local residents, and the ability to prepare for emerging technology such as 5G with ultrafast connectivity. The proposal would deliver the Government's objective of the public having access to a choice of high quality electronic communications services. The improved connectivity would also help to strengthen the Barnsley's digital economy, innovation and productivity.

The proposal presents an expansion of Everything Everywhere and Three's electronic communication networks, providing improved services for thousands of local customers. This would be delivered by way of a mast and site sharing arrangement. This approach is fully in accordance with the NPPF.

A key consideration is the balance of protecting the appearance of the surrounding area, and the amenity of local residents, while also enabling the growth ambitions for Barnsley to be suitably served by high capacity infrastructure. This statement has aimed to demonstrate that proposal would result in a moderate magnitude of visual change and any deemed harm should be weighed against the considerable public benefits set-out, including economic and social benefits. It is considered that on balance the proposal would provide more benefits than harm and as such should be supported.



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