SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Premier Foods	Site Address:	Premier Foods, Fish Dam Lane, Carlton, Barnsley, S71 3HQ.
National Grid Reference:	E436843 N409922		
Site Ref Number:	88574_VF	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 an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	**No**
If no explain why: LPA do not have a mast register		
Was the industry site database checked for suitable sites by the operator:	**Yes**	No
If no explain why: n/a		

Annual Area Wide Information to local planning authority

Date of information submission to local planning authority	October 2014
Name of Contact:	Head of Planning
Summary of any issues raised:	List of existing sites at that time within the authority.

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	27.01.15	
Was there pre-application contact:	**Yes**	No
Date of pre-application contact:	09.02.15	
Name of contact:	Steven Kirkham	

Summary of outcome/Main issues raised:
A pre-application consultation email was sent to the LPA on the 27.01.15 detailing the site-specific proposal and the need for the telecommunications base station. The following comments were received;

"Firstly there would be no objection in principle to the proposals, The Authority recognises the importance of good telecommunication infrastructure and would be supportive to proposals that would improve local network coverage/service. We must however, strive to ensure that new installations are located so as to have the least environmental impact.

In terms of the site selection process the mast would benefit from screening from trees and structures within the bakery site. However, it may have the potential to look rather prominent owing to its location in relation to the sites entrance. I would query why a roof mounted structure has not been considered as this would allow the associated apparatus to be installed in a more discreet manner, alternatively a location which is closer to the building would also be preferable (as suggested on the attached).

I would be grateful if come consideration could be given to these comments prior to submitting a formal application".

A response was sent on the 10.02.15 detailing that the location had been chosen due to coverage restraints. A copy is included with this application.

It was considered appropriate to progress this application and seek the LPA's formal determination.

[1] Macro or Micro

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red	Amber	**Green**
Outline Consultation carried out: A pre-application consultation email was sent to the ward councillors on the 27.01.15 detailing the site-specific proposal and the need for the telecommunications base station. A pre- application consultation letter was also sent to the following properties on 27.01.15 detailing the site-specific proposal and the need for the telecommunications base station; 1, 2, 4, 6, 8, 15, 24, 26 & 28 Manor Farm Close, Fish Dam Lane, Carlton, Barnsley, S71 3EH. Wharncliffe Arms, Fish Dam Lane, Carlton, Barnsley, S71 3HF			
Summary of outcome/Main issues raised: No comments have been received to date			

School/College

Location of site in relation to school/college *(include name of school/college):* Carlton Primary Academy, Fish Dam Lane, Carlton, Barnsley, S71 3HF. Approximately 130m from proposed site.
Outline of consultation carried out with school/college *(include evidence of consultation):* A pre- application consultation letter was sent to the Head Teacher and Chair of Governors on 27.01.15 detailing the site-specific proposal and the need for the telecommunications base station
Summary of outcome/Main issues raised: No comments have been received to date

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: n/a		

Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	No
Date served:		10.02.15

3. Proposed Development

The proposed site:
For reference please see below a photograph of the proposed site; 

The equipment would be positioned in front of the trees on the grassed area adjacent to the Premier Foods premises steel barrier and access gates. The trees to the rear of the proposed site are approximately 8-10m high. There are trees lining the property boundary, adjacent the Fish Dam Lane, which will not completely obscure the view of the installation but they will provide a level of screening. The immediate area surrounding the site is Premier Food's property and the wider area is predominantly residential in nature.

Type of Structure		Jupiter
Description: The installation of a 15 metre Jupiter pole housing three antennas mounted together at the top of the structure. The main stem of the column is cylindrical and will measure 324mm in diameter in which towards the top it will taper to a 540mm diameter antenna shroud. The length of the cylindrical antenna shroud section will be 2500mm. It is of note that the proposed scheme involves the installation of 3no. new equipment cabinets. The dimensions of the proposed equipment cabinets are detailed below.		
Overall Height:		15 metres
Equipment Housing: 1no. BTS 3900AL equipment cabinet		
Length:		700 mm
Width:		700 mm
Height:		1925 mm
Equipment Housing: 1no. TSC equipment cabinet		
Length:		600 mm
Width:		600 mm
Height:		1419 mm
Equipment Housing: 1no. meter cabinet		
Length:		655 mm
Width:		255 mm
Height:		1025mm
Tower/mast etc – type of material and external colour:	Galvanised steel - painted grey (RAL 7035)	
Equipment housing – type of material and external colour:	Galvanised steel - painted green (RAL 6009)	

Reasons for choice of design:

In this instance, the choice of design tabled in this application has been influenced by the proposed base station's setting, as well as the added emphasis to cater for 3G coverage requirements.

The overall height of the proposed column at 15 metres to top has been kept to its technical minimum given the structure types which are available to the aforementioned operator. The proposed monopole is at a height of 15 metres to allow for adequate coverage to the target area.

It is highlighted that the antennas in this instance would be concealed within a cylindrical shroud which would be integral to the upper most section of the monopole. Furthermore the dimensions of the structure are the thinnest available so as to be able to support the technically preferred antennas and feeder cables. It is of note that the antennas are closely spaced together so as to keep the profile of the column as thin as possible. Also it is considered that in opting to connect the site into the national network via an underground link rather than rely on a transmission dish, this has simplified the design and hence reduced the proposal's prominence.

The proposed column in its entirety will have a grey finish in which it is considered that this treatment will help assimilate the column into the surrounding environment. The choice of a slim-line monopole with shrouded antennas is considered to be appropriate as it would minimise the visual impact of the development. In light of the above and in choosing this particular monopole design, it is considered that the scheme takes a form which is sympathetic within the context of its immediate surroundings.

The proposed equipment cabinets are less than $2.5m^3$ each and will be located alongside the new monopole. It should be recognised that seen on their own merits they do not normally require a formal determination of the Council and are often considered as permitted development. The proposed equipment cabinets have an appearance similar to existing cabinets found in a street scene. The proposed ground based development will be painted green hence helping it to blend into its environment and reducing its prominence within its immediate environment. In this respect it is considered that the design of the ancillary development will not have a detrimental impact upon the visual amenity of the area.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached 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, Vodafone Limited 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 Vodafone Limited'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.	**Yes**	No

4. 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

Premier Foods, as a corporate customer of Vodafone, have highlighted deficiencies in their network coverage at their property in Carlton. It has been identified that the level of indoor coverage is generally poor.

There are no existing telecommunications sites in the area which could be upgraded to provide Premier Foods with the required coverage and on that basis, a new base station is required.

The new Code of Best Practice on Mobile Phone Network Development published by the Mobile Operators Association (MOA) in July 2013 explains the special operational and technical considerations, which the telecommunications industry encounters. It also details the evolution of mobile networks and discusses the implications of mobile connectivity in the 21st Century. The new Code of Best Practice on Mobile Phone Network Development explains how mobile networks function and the challenges faced in providing sufficient signal, coverage and capacity to supporting customer experiences. It is also of note that the MOA has produced a new guidance document to clarify some of the technical aspects of network development entitled 'Mobile Networks: What They Are and How They Work', August 2013.

5. Site Selection Process

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)

Site Type	Site Name & 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:
No alternative sites outside of the Premier Foods property were considered as this proposal has been specifically designed to improve coverage in the premises. A rooftop option (e.g. a stub tower) was not viable as the installation is to provide coverage for the Premier Food premises itself. A rooftop installation, due to the umbrella effect of coverage from the antennas, would mean that the majority of the coverage would be overshooting the building. A ground based mast could not be located too close to the building as again this would limit the area of coverage. The building could also cause clipping of the signal if the mast was located too close to the building. A radio planner determined the best location using coverage tools to allow for optimum coverage to the entire Premier Foods property. The installation will also provide 3G coverage to the wider area.

Planning Policies

Local Planning Policy

In accordance with the Planning and Compulsory Purchase Act 2004 (as amended) and National Planning Policy Framework, it is acknowledged that the Council's approach to the plan-led system has evolved. It is acknowledged that Central Government seek to streamline the process for the preparation of Development Plans, in which the Local Planning Authority is now in the process of preparing a new Local Plan. The Local Plan is intended to shape future development and set the overall strategic planning framework for authority. The Core Strategy is still in use in this interim period, in which there is no policy specific to telecommunications development.

National Planning Policy

National Planning Policy Framework (2012)

5 - Supporting high quality communications infrastructure
The National Planning Policy Framework (NPPF) set out Central Government's planning policies for England and how these are expected to be applied. It replaces a number of planning documents including Planning Policy Guidance 8 – Telecommunication. NPPF sets out the Central Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Pertinent to telecommunications development section 5 of NPPF sets out the Governments general overview regarding supporting high quality communications infrastructure and is stated as follows: -

"42. Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.

43. In preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.

44. Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. They should ensure that:

- *they have evidence to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*
- *they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and telecommunications services.*

45. Applications for telecommunications development (including for prior approval under Part 24 of the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- *the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college or within a statutory safeguarding zone surrounding an aerodrome or technical site; and*
- *for an addition to an existing mast or base station, a statement that selfcertifies that the cumulative exposure, when operational, will not exceed International Commission on non-ionising radiation protection guidelines; or*
- *for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self certifies that, when operational, International Commission guidelines will be met.*

46. Local planning authorities 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."

Code of Best Practice on Mobile Phone Network Development (2013)
A new English Code of Best Practice on Mobile Network Development has replaced the original guidance document that was first published in 2002. Since the previous version, there have been significant changes in planning policy with NPPF replacing PPG8, as well as in technology and infrastructure rollout due to consolidation agreements. The new Code of Best Practice is now more reflective of today's current practices, in which it is intended to be kept under review and will be updated every 18 months to take onboard any matters arising. The planning process and tools in the new Code of Best Practice remains much the same as previous, in which the following is considered relevant in this particular case: -

The opening paragraphs of the new Code of Best Practice acknowledge the material weight that should be given to NPPF, in particular Section 5 - Supporting high quality communications infrastructure as noted above. It is noted in paragraph 3.2 that special operation and technical considerations should be taken into account in which it is stated that due to increased demands of mobile device users there will be *"the requirement to upgrade and improve networks through changes to existing sites and the development of new sites"*

It is highlighted in paragraph 7.5 and in Appendix A which sets out the operators Ten Commitments that there will always be an emphasis on site sharing. Operators will *"continue to work together to locate base stations on existing structures, and to share sites wherever viable in order to reduce the need to build new masts on which to locate their equipment and to minimise the number of base station sites in the UK."*

Appendix B discusses the general principles for telecommunications development. It is stated that "*The Government's general policy on telecommunications development is to facilitate the growth of efficient and effective telecommunication systems whilst keeping the environmental impact of such development to a minimum. The siting and design of telecommunications equipment, if undertaken with care and sensitivity, will be vital in achieving this policy aim. Good siting and design should not only be respected in environmentally sensitive areas but should also be applied to all telecommunications development. In all circumstances, the sensitivity to context of the proposed development should be considered.*

In particular, the following general design principles should be regarded as important considerations in respect of telecommunications development:

- *Proper assessment of the character of the area concerned*
- *Design should be holistic and three dimensional showing an appreciation of context;*
- *Analysis of the near and far views of the proposal and to what extent these will be experienced by the public and any residents;*
- *Proposals should respect views in relation to existing landmarks and distant vistas;*
- *Proposals should seek to consider the skyline and any roofscapes visible from streets and spaces;*
- *Choice of suitable designs, materials, finishes and colours to produce a harmonious development and to minimise contrast between equipment and its surroundings.*

The options for the design used by an operator will be affected by site conditions, technical constraints, landscape features and coverage and capacity requirements. The main options would include:

- *Mast and/or site sharing;*
- *Installation on existing buildings and structures;*
- *Camouflaging or disguising equipment where appropriate;*
- *Using small scale equipment;*
- *Erecting new ground based masts."*

Appendix B goes on and recognises that mast and site sharing is a longstanding Government policy objective. In this regard the Government encourages telecommunications operators, wherever viable, to share masts and sites as a means of minimising overall mast numbers. It is stated in Appendix B that *"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."*

Mobile Networks: What They Are And How They Work (2013)
It is highlighted that the new Code of Best Practice is supplemented by a document titled 'Mobile Networks: What They Are And How They Work'. It explains the main factors that affect radio signals such as shadowing, attenuation, diffraction and reflection. In this regard it should be appreciated that antennas need to be sited with the clearest possible view of the area for which they are intended to provide coverage. It is stated that *"there are various reasons that can lead to the need for new cell sites. Two main ones are the need for additional coverage and capacity. Other factors that can lead to the need for new sites include the introduction of new technologies and services; new property developments in an area requiring new coverage or additional capacity; or redevelopment of an area requiring existing sites to be replaced."*

Planning Assessment
From the outset, it should be appreciated that irrespective of the installation's use as a telecommunications base station, the installation of a tall structure 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 height and design does not automatically result in an overwhelming adverse harm.

As discussed previously with regards the choice of design, it is considered that the proposed development will not undermine the visual amenity of the area. The extent of development has been kept to a minimum, whereby in this respect and balanced against the other material matters as below, it is considered that the proposal is acceptable.

Taking into account the context in which the proposal would be read, it is considered that this site is an appropriate location to site a radio base station. The scheme would be set back from the main highway on private land which allows for unimpeded pedestrian and vehicular movements. There is a commercial property and mature trees and foliage in the immediate locality and these are all considered features that would help assimilate the proposal into this particular environment. In light of the above it is considered that the proposal would not be overly intrusive in the area and its visual impact would not outweigh the need to provide coverage to the surrounding area.

As stated above and as is further explained within the attached "general background" document, the rapid increase in the use of mobile communications and our society's ever increasing dependence upon it has resulted in a direct need for network improvements through the upgrading of existing sites and the deployment of additional base stations in order to address these needs.

The proposal is to install a 15 metre high monopole and three equipment cabinets. The monopole will have a galvanised finish and the equipment cabinets will be coloured green. The proposal is not considered to be of such detriment to local amenity or the skyline so as to merit a refusal.

Vodafone are committed to ensuring that the amount and dimensions of all newly proposed apparatus be limited to a minimum operational requirement so as to minimise potential impact.

Given the design and location of the proposed installation along with the fact that the subject site does not sit within a restrictive planning policy area, it is not considered that this proposal will have anything other than an insignificant impact upon the character of the site and local amenity.

In light of the case presented above, the applicant considers that the proposal strikes a good balance between environmental impact and operational considerations.

Health & Safety
Court cases have confirmed that the public perception of health risks can be a material consideration within the planning system. That said the weight to be attached to this issue has to be determined accordingly in each case by the decision maker. However it has been generally upheld and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been

demonstrated that the proposed base station will comply with the International Commission on Non-Ionizing Radiation Protection guidelines.

It should be recognised that it has been long since established that it is Central Government's stance that the planning system is not the appropriate mechanism for determining health safeguards. It remains Central Government's responsibility to decide what measures are necessary to protect public health. Most notably it is Central Government's view that if a proposed development meets the ICNIRP guidelines for public exposure it should not be necessary for a Local Planning Authority, in processing and determining an application for planning permission or prior approval, to consider further the health aspects and concerns about them.

In this respect the operator believe that it is not necessary to consider health effects further. Vodafone as well established operators are committed to ensuring that all new and upgraded installations are ICNIRP compliant. In this regards there should be no basis for this case to be refused on health and safety grounds or for reasons relating to public concerns about health and safety. An ICNIRP compliance certificate is attached as part of this submission, as required by NPPF paragraph 45. As previously noted in this submission statement the ICNIRP declaration takes into account the cumulative effect of the emissions from the proposed installation and all radio base stations present, at or co-located near to the proposed installation. Albeit the proposal has dual user capabilities and seeks to provide multiple technologies the radio frequency emissions from the proposed development will be may times lower than the ICNIRP reference standard in all publicly accessible areas around the installation. In the light of the above information, it is clear that the weight to be given to such health and safety concerns should not be so great as to warrant a refusal of the case on these grounds.

Contact Details

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