



TELECOMMUNICATION INSTALLATION

FOR

'EE Limited'

Telecommunications Site at

**CLITHEROE CONSERVATIVE
CLUB, CASTLE STREET,
CLITHEROE, LANCASTER,
BB7 2BT**

**SUPPLEMENTARY INFORMATION
FORM**

and

SUPPORTING STATEMENT

February 2017

Prepared by:

Daly International

EE Limited ref:

20417

Clitheroe Conservative Club

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Clitheroe Conservative Club	Site Address:	Clitheroe Conservative Club, Castle Street, Clitheroe, Lancaster, BB7 2BT
NGR:	E 374292, N 441848		
Site Ref Number:	20417	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: Upgrade of existing site.		
Was the industry site database checked for suitable sites by the operator:	Yes	No
If no explain why: Upgrade of existing site.		

Annual roll out consultation with LPA

Date of last annual rollout information/submission:	October 2014
Name of Contact:	Chief Planning Officer
Summary of outcome/Main issues raised:	It was agreed that the LPA and 'EE Limited' would adhere to the 10 Commitments.

¹ Macro or Micro

Pre-application consultation with LPA

Date of written offer of pre-application consultation:		
Was there pre-application contact:	Yes	No
Date of pre-application contact:		
Name of contact:		
Summary of outcome/Main issues raised:		
As the proposed development is considered a modification to an existing site, it was deemed unnecessary to conduct any pre-application consultations.		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline Consultation carried out:			
The proposal was rated as GREEN, in accordance with the guidelines set within the code of best practice for telecommunication operators. Due to this rating, and the fact that the development is considered to be a minor alteration to an existing site, no consultation was deemed necessary.			
Summary of outcome/Main issues raised:			
N/A			

School/College

Location of site in relation to school/college:
The proposed development is not located near to any school or college.
Outline of consultation carried out with school/college:
As the proposed works are minor in nature and located away from any of the surrounding schools, it was deemed unnecessary to carry-out pre-application consultation prior to the submission of this application.
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: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	06/02/2017	

3. Proposed Development

The proposed site:		
Upgrade and replacement of roof-mounted telecommunication base-station at Clitheroe Conservative Club, Castle Street, Clitheroe, Lancaster, BB7 2BT.		
See Supporting Statement for more information.		
Type of Structure : Telecommunications Base Station (Cell Ref. 20417)		
Description:		
Replacement of 16.6m high telecoms supporting structure with upgraded 17.3m high structure, installation 2 No. equipment housing cabinets, plus associated ancillary development.		
Overall Height:	17.3m	
Height of existing mast:	16.6m	
Equipment Housing:		
Individual dimensions:	Duo Cabinet	Samo Cabinet
Length	1200mm	750mm
Width	750mm	600mm
Height	2190mm	2080mm
Material:	Steel	
Tower/mast etc – type of material and external colour:	Steel/plastic, coloured white.	
Equipment housing – type of material and external colour:	Steel, grey.	

Reasons for choice of design:
<p>The existing 'EE Limited' telecommunications base-station currently provides 3G services to local users. The purpose of this proposal is to upgrade the base-station to enable local users to also benefit from 2G and 4G coverage.</p> <p>The broadcast of new services from the site requires replacement antennas which are of greater scale</p>

than the antennas which are currently concealed with the support structure. There is also additional ancillary equipment required such as cabling. The design of the existing support structure cannot feasibly accommodate the additional equipment proposed, therefore a replacement structure of slightly larger scale is required.

The proposed replacement structure has been designed to accommodate all of the new equipment required with minimal redundant space. It is one of the most slim-line telecoms structure available that is capable of accommodating the amount of equipment required. The replacement structure would be very similar in scale, form and appearance to its predecessor. The structure is the most 'like for like' structure available to the operator.

The layout of the apparatus has in part been informed by the fact this is an upgrade and therefore the replacement apparatus must connect to existing infrastructure. In addition, for the antennas to operate effectively, they must clear all surrounding structures to avoid signal 'clipping'. This would have been factored into the design of the original base-station.

The size of the equipment cabinets has been limited to what is required to meet current and foreseeable network requirements. The location of the cabinets, and the electronic communications equipment housed within them, reflects the technical and operational requirement to be in reasonable proximity to the antenna system they support. This avoids exceptionally large runs of feeder cables and associated supporting trays, and the subsequent loss of signals. The cabinets would be located on a part of the building which is not visible from the surrounding area.

4. Technical Information

	Yes	No
<p>ICNIRP Declaration attached.</p> <p>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.</p> <p>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</p>		

<p>interference within its own network and with other radio networks, (EE LIMITED) operates its network in such a way, that the radio frequency power outputs are kept to the lowest levels to commensurate with effective service provision.</p> <p>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.</p>		
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5. Technical Justification

<p>Reason(s) why site required e.g. coverage, upgrade, capacity:</p> <p>The existing 'EE Limited' telecommunications base-station currently provides 3G services to local users. The purpose of this proposal is to upgrade the base-station to enable local users to also benefit from 2G and 4G coverage.</p> <p>The upgraded base-station will also be shared by another operator 'Hutchinson 3G' (aka Three). The site will become 'dual-operator' which means that Three will also provide coverage for its local customers from the same site, avoiding the need for them to establish another base-station elsewhere in the local area. This approach is consistent with national planning policy objectives which seek to limit the number of telecommunication sites across the country to what is necessary.</p> <p>The works are part of a national upgrade of EE's network that will enable local users to benefit from the latest generation of mobile network technology. The upgrade will provide faster and more reliable mobile data services resulting in social and economic benefits for local businesses, residents and visitors to the local area.</p> <p>As the proposed works constitute upgrade of an existing site, the application omits the identification of any other sites in the area. This is also consistent with the government's policies as stated in National Planning Policy Framework (NPPF), to keep the number of base-stations to a minimum.</p>



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

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

No alternative site options have been investigated, as the works proposed are the necessary upgrade and replacement of an existing site.

Additional relevant information: NA

SUPPORTING STATEMENT

The Application Site

It is proposed to upgrade an existing telecommunication base-station which currently comprises 1 No. 16.6m high wall-mounted support structure and casing with radio antennas concealed within, and 1 No. equipment cabinet plus ancillary development.

The apparatus is affixed to the rear of Clitheroe Conservative Club building with Castle Street running to the east at the front of the building and a carpark to the west at the rear of the building. The building is in a central location within the town of Clitheroe.

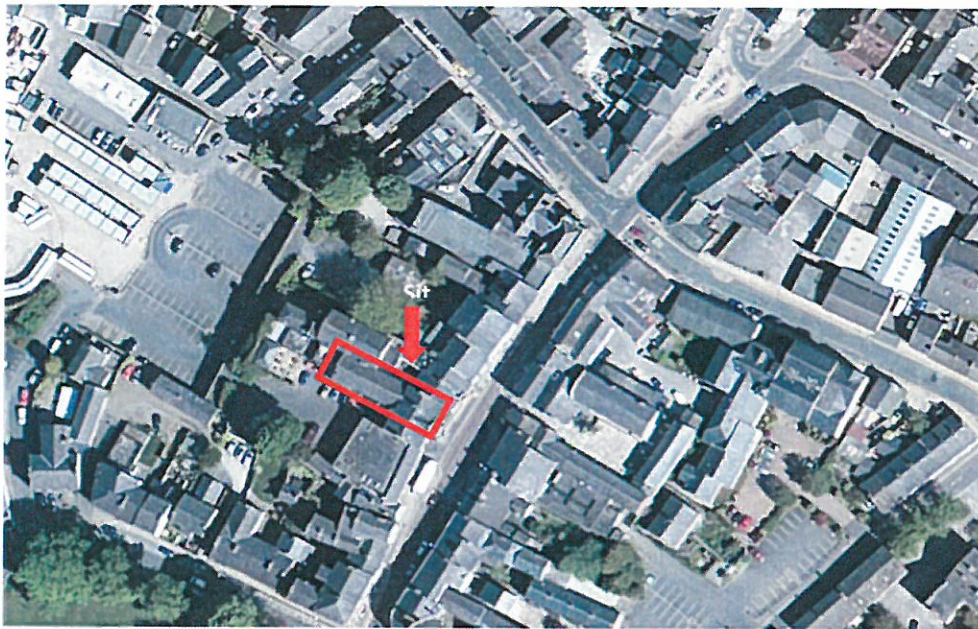


Fig. 5: Location of site [Coordinates – E 374312, N 441842]



Fig. 6: Photos of application site.

Environmental Assessment

Landscape and visual

The position of the mast, and its comparable scale to the mast which is to be replaced, means that the impact on long distance views would not be any greater than is currently the case. It is considered that the proposal would not appear out of place, nor would it dominate the local landscape. On the contrary, the structure would integrate well into the local skyline. The mast which is to be replaced has become an established feature of the local landscape and it is considered that the magnitude of visual change resulting from this proposal would be low. The replacement structure is very similar in scale, form and appearance. The character and appearance of the local area would be maintained.

Neighbouring occupier amenity

The proposal would not result in the loss of sun light or overshadowing for the nearest residential properties, nor would the proposal would not result in loss of outlook from any property. The development would not give rise to issues relating to noise and disturbance.

Transportation

The National Planning Policy Framework (NPPF) informs that '*development should only be prevented or refused on transport grounds where the residual cumulative impacts are severe*' (para. 32).

The residual matters in relation to this type of development are principally concerned with ensuring that there is no obstruction to visibility splays or road traffic signs, and no severe impact as a result of maintaining the installation.

The proposal's design has ensured compliance with requirement to prevent obstruction and protect highway safety. In terms of maintenance, approximately once every three months an engineer would park his van lawfully nearby and walk to the equipment cabinets to complete routine checks and servicing. There would not ordinarily be need for large vehicles or apparatus to visit the site during the operational period.

Electrical interference

We can advise on behalf of our client that the proposed installation should not cause any undue electrical interference for nearby residents. EE Limited operate within radio frequency bands which are

licensed and specific to them and this is regulated in the UK by the Office of Communications (Ofcom).

Health effects

The NPPF informs that when determining applications, authorities should not determine health safeguards if the proposal meets International Commission guidelines for public exposure. A declaration of conformity with these guidelines has been submitted with the application.

Development Plan

The 'Core Strategy 2008-2028: A Local Plan for Ribble Valley' forms part of the Development Plan for where the application site is located. The site falls within the Clitheroe Conservation Area where Policy DME4 is relevant.

POLICY DME4: PROTECTING HERITAGE ASSETS

10.15 IN CONSIDERING DEVELOPMENT PROPOSALS THE COUNCIL WILL MAKE A PRESUMPTION IN FAVOUR OF THE CONSERVATION AND ENHANCEMENT OF HERITAGE ASSETS AND THEIR SETTINGS.

1. CONSERVATION AREAS

PROPOSALS WITHIN, OR AFFECTING VIEWS INTO AND OUT OF, OR AFFECTING THE SETTING OF A CONSERVATION AREA WILL BE REQUIRED TO CONSERVE AND WHERE APPROPRIATE ENHANCE ITS CHARACTER AND APPEARANCE AND THOSE ELEMENTS WHICH CONTRIBUTE TOWARDS ITS SIGNIFICANCE. THIS SHOULD INCLUDE CONSIDERATIONS AS TO WHETHER IT CONSERVES AND ENHANCES THE SPECIAL ARCHITECTURAL AND HISTORIC CHARACTER OF THE AREA AS SET OUT IN THE RELEVANT CONSERVATION AREA APPRAISAL. DEVELOPMENT WHICH MAKES A POSITIVE CONTRIBUTION AND CONSERVES AND ENHANCES THE CHARACTER, APPEARANCE AND SIGNIFICANCE OF THE AREA IN TERMS OF ITS LOCATION, SCALE, SIZE, DESIGN AND MATERIALS AND EXISTING BUILDINGS, STRUCTURES, TREES AND OPEN SPACES WILL BE SUPPORTED.

IN THE CONSERVATION AREAS THERE WILL BE A PRESUMPTION IN FAVOUR OF THE CONSERVATION AND ENHANCEMENT OF ELEMENTS THAT MAKE A POSITIVE CONTRIBUTION TO THE CHARACTER OR APPEARANCE OF THE CONSERVATION AREA.

A key consideration is that because this is a proposal to upgrade an existing telecommunication base-station, as oppose to establishing a new one, then there is no option to identify an alternative site located outside of the conservation area.

Furthermore, the magnitude of visual change resulting from the works would be negligible. The impact on the character and appearance of the conservation area would not be materially greater than is presently the case. The principle of this site being used to accommodate telecommunication apparatus has already been deemed acceptable by virtue of the extant planning permission at the site.

Even if a counter position is adopted and some limited harm to the overall character and appearance of the conservation area is perceived, then the guidance at paragraph 134 of the NPPF applies. This

advises that the less than substantial harm caused should be weighed against the public benefits of the proposal, in this case the improved communications coverage including the introduction of 4G services. Paragraph 138 of the Framework further advises that not all elements of a conservation area will necessarily apply to its significance and it could be concluded that the application site falls into this category.

National Planning Policy

The National Planning Policy Framework (NPPF) was published on 27th March 2012. The NPPF supports high quality communications infrastructure and recognises it as a strategic priority.

At para. 42 it states that:

“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.”

The NPPF continues at para. 43:

“...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.”

The NPPF goes on to state at Para. 46 that:

“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.”

As recommended by NPPF paragraphs 42-46, 128 and 132, the mobile phone base station meets the guidelines of the International Commission on Non-ionising Radiation Protection (ICNIRP). An ICNIRP certificate has been attached with the application, for your reference. It is considered that the proposed development fully adheres to the guidance contained within the NPPF.

Code of Best Practice on Mobile Phone Network Deployment – (November 2002)

The *Code of Best Practice* (first published November 2002, revised July 2013) is produced jointly by all Mobile Phone Operators and representatives of Central and Local Government. It provides clear

and practical advice to ensure the delivery of significantly better and more effective communication and consultation between operators, local authorities and local residents.

Though the Code is a non-statutory document, as it was prepared jointly by representatives of central and local government and the mobile phone industry, it is considered to be a material consideration in this case.

General siting and design principles for all telecommunications installations are provided in Appendix B of the Code. The principles exist subject to the following variables:

"..site conditions, technical constraints, landscape features and coverage and capacity requirements".

Appendix B echoes the NPPF's emphasis on the re-development or sharing of existing telecoms sites as a means of reducing the number of such sites to the minimum consistent with the efficient operation of the network.

In addressing the re-development of sites upon rooftops (or other structures) Appendix B provides a series of design aims. With respect to the proposed scheme these include:

- Keep in proportion to the building or structure;
- Respect architectural style;
- Have minimal impact above the roof line commensurate with technical constraints;
- Not be detrimental to important views and skyline;
- Avoid creating clutter;
- Use clean lines and maintain symmetry

In summary, the planning application submitted herewith fully embraces both the voluntary and compulsory good practice principles contained within the Code.

Conclusions

'EE Limited' has identified that this upgrade is required to improve the service provided and to meet the demands of customers in this area. The proposed installation represents both the optimum planning/environmental and technical solution in this instance. As such, the development as proposed is in accordance with both local and national planning guidance.

The proposal is in accordance with the Development Plan and in particular with respect to the design principles applied and preservation of the Clitheroe Conservation Area. National planning policy aims



to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This application details the technical need for the replacement and installation of apparatus to provide improved customer service for customers of 'EE Limited'.

The economic and social benefits that local residents, businesses and visitors will gain as a result of the upgrade are key material considerations. As is that the base-station would become dual-operator meaning that the operator 'Three' will share the site, thus preventing the need to establish a second base-station in the local area. It is also material that it is proposed to utilise an existing telecommunication site and affix apparatus to a building, something encouraged by the NPPF (para 43).



RELATED DOCUMENTS

The following documents may be of assistance in determining this application:

- NPPF (March 2012)
- Code of Best Practice on Mobile Phone Network Development – www.odpm.gov.uk
- Office of Communications (Ofcom) – www.ofcom.org.uk

Contact Details

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Signed:	Mark Flaherty	Date:	06.02.2017
Position:	Senior Planning Consultant	Company:	
		(on behalf of CTIL and above operator)	

