

**SUPPORTING STATEMENT:  
SITE SPECIFIC SUPPLEMENTARY INFORMATION INCORPORATING DESIGN & ACCESS  
STATEMENT**

1. Site Details

Site Name:	Airwave mast 'Dunsop Trout Farm'	Site Address:	Airwave Radio Tower site at: Land at Dunsop Trout Farm, Dunsop Bridge Clitheroe BB7 3AX
National Grid Reference:	365548,449827		
Site Ref Number:	LNC013 EAS0059	Site Type: <sup>1</sup>	MACRO - GREENFIELD

2. Pre-Application Check List

**Site Selection (for New Sites only)**

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		No
If no explain why: The proposal makes use of an existing and established telecommunications site		
Were industry site databases checked for suitable sites by the operator:		No
If no explain why: N/A		

**Site Specific Pre-application consultation with local planning authority**

Was there pre-application contact:	Yes
Date of pre-application contact:	17/07/2020
Name of contact:	
Summary of outcome/Main issues raised: Correspondence and supporting documentation confirmed as having been delivered electronically. Request for further information requested by Harriet McCartney in terms of the site location. Design amendments made from a 3-legged tower to 4-legged in order to 'future-proof' the site for 'Shared Rural Network' (SRN) purposes, further details contained within this statement. The location of the site has been moved by around 15m in order to ensure the site can be designed and built for the immediate EAS and Airwave requirements along with the SRN future proofing element. The tower height remains the same heights as detailed within the prior consultation with the replacement tower at the same height as the existing tower i.e., 15m.	

**Community Consultation**

Rating of Site under Traffic Light Model:	Red	Amber	Green
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<sup>1</sup> Macro or Micro

**Outline of consultation carried out:**

A Traffic Light Rating has been carried out to help assess the appropriate level of consultation, and using this process, the proposals have been categorised Green. In accordance with the code of best practice the following were also consulted on the 17<sup>th</sup> July 2020:

**Ribble Valley Borough Council Ward Councillors – Chipping Ward - Councillor Simon**

Hore. Email [redacted]

[redacted] Rowland [redacted]

[redacted] - Mrs Rachel A Carr. Email

N/A

**Summary of outcome/main issues raised (include copies of relevant correspondence):**

Correspondence and supporting documentation confirmed as having been delivered electronically and read.

Councillor Hore confirmed receipt on 29/07/20 but did not make a material comment on the proposals other than 'I will wait for the planning application'.

Rachel Carr requested we carry out further consultation with Thorneyholme RC Primary School and the Duchy of Lancaster, a major landowner in the area. This was issued on 11/08/2020.

On 08/12/2020 – further consultation was issued to all these parties with the finally settled location and design – per the drawings forming a part of this application.

No further feedback received from any of the consultees.

**School/College**

**Location of site in relation to school/college (include name of school/college):**

*The following schools are all within 300m of the site:*

*No schools within 300m of the site but Thorneyholme RC Primary schools is close by and at the request of the Parish Council were also consulted*

**Outline of consultation carried out with school/college (include evidence of consultation):**

N/A

**Summary of outcome/main issues raised (include copies of main correspondence):**

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?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: N/A		

**Developer's Notice**

Copy of Developer's Notice enclosed?	Yes	
Date served:	25.05.2021	

**3. Proposed Development**

The proposed site:

**Background:**

Airwave Solutions Ltd currently operate the UK wide emergency services network and will continue until the expiry date of their operating licence. The existing tower, which is on a site with a long-established telecommunications use, is integral to their network and will remain so for several years to come. The Emergency Services Mobile Communications Programme (ESMCP) is the Home Office led programme responsible for the new Emergency Services Network (ESN). It aims to provide a 4G integrated voice and broadband data communications service for the 3ES: Police, Fire & Rescue and Ambulance Services. ESN has initially been deployed by enhancing an existing commercial network configured to give the 3ES priority over other users. This proposal, as a component of the ESN, is for the Extended Area Services (EAS) which is to provide additional infrastructure to extend the ESN into primarily remote and commercially unviable areas where little or no mobile network coverage exists. The Home Office EAS team have identified this existing Airwave tower as a site share opportunity to negate the need for unnecessary mast proliferation which accords with Local Planning Policy and the NPPF. With their network plans now reaching maturity, these final coverage holes are being addressed and resolved with the use of key existing infrastructure towers such as the subject Airwave installation.

**Shared Rural Network (SRN):**

<https://www.gov.uk/government/news/shared-rural-network>

In addition, as a result of the recent project announcement between the MNO's and the Government for a sustainable approach to the challenge of delivering rural mobile coverage, there is a requirement to also include SRN apparatus which can also be deployed on the tower in due course in order to provide the public and local community with access to 4G coverage without the need to duplicate infrastructure developments elsewhere, thus minimising the impact more generally in the area.

The site as designed does not specifically include the apparatus which would be required for SRN by other MNO's but the tower has been designed so as to be 'future proofed' i.e. dependent upon specific requirement apparatus in the form of additional antennae can either be attached lower down on the proposed tower or higher with a small extension to the tower.

These are clear and obvious benefits which would be provided to the residents, workers and visitors in the area in addition to the equally clear and wider public benefits of the new ESN/EAS network.

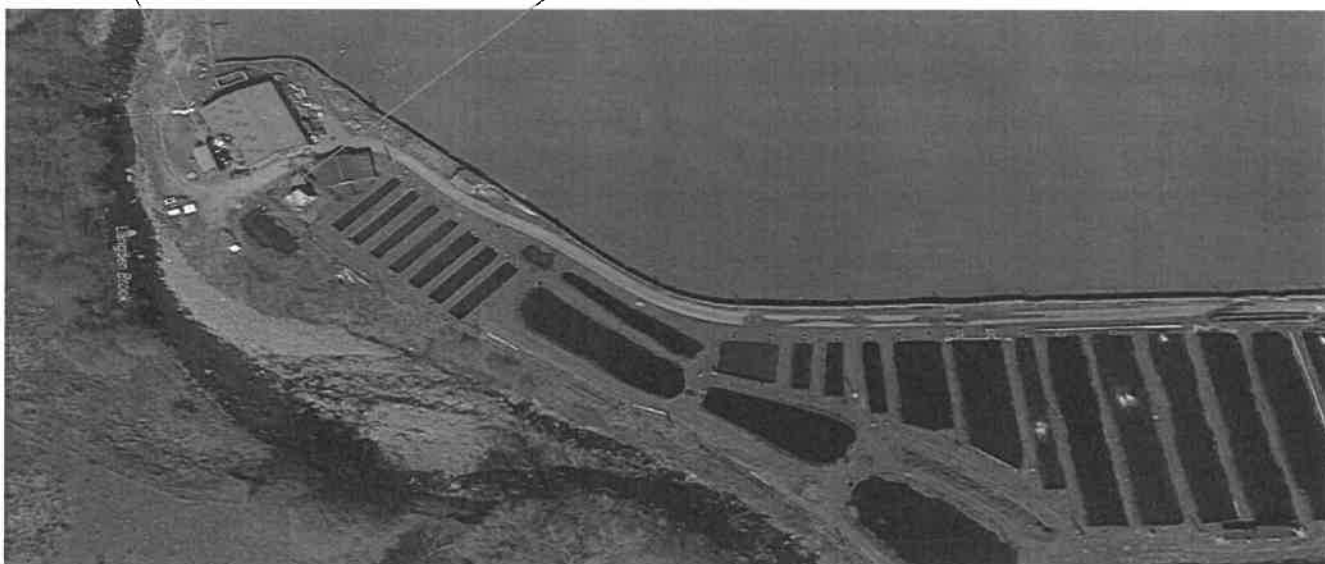
**Description of the Site:**

The application site is an existing Airwave emergency services telecommunications base station tower located at:

**Airwave Radio Tower site at: Land at Dunsop Trout Farm, Dunsop Bridge Clitheroe BB7 3AX.  
NGR 365548,449827**

Proposed Site Location

Existing Site Location



The Site is located to the south of the small village of Dunsop Bridge within the Forest of Bowland. Situated at the rear of the trout farm, some 260m from the nearest stretch of public highway, the site benefits from the assistance a variety of operational buildings, poles and nets over the various ponds within the farm offer in terms of minimising visual impact of the site as existing and as proposed. This is further assisted by the land to the rear/west which has mature tree cover rising steeply from around 120m ASL up to 234m ASL. There are a number of minor roads in the area running through Dunsop Bridge. The area is predominantly rural in nature with predominant land uses being for farming purposes with a smattering of residential buildings along with a school, pub and church within the village. The site itself is set within a substantial commercial trout farm operation.

At this stage, the development is restricted to an ESN/EAS use only (i.e., no shared Rural Network (SRN) use is proposed but is future-proofed for such a use). The established Airwave communications base station location provides the necessary technical ESN/EAS solution but the existing tower is not structurally capable of taking an increased antennae load with the extra associated wind loading and hence the need for a proposed new tower albeit with no height increase. The design has been prepared within a new compound area to ensure this provides sufficient space for the installation proposals to take place at ground level.

See photo below of the existing Airwave Tower which as is noted is very well screened at ground level and the trees to the north provide very good shielding and screening of the tower thereby minimising any visual impact of the proposed development:

Existing site location:

Proposed Site Location (distance circa 13m)



Existing site location:

Proposed Site Location at rear of farm sheds



Site as viewed from main entrance to Dunsop Trout Farm:



**Proposed Development:**

For further detail see the following attachment to the application:  
**LNC013 – EAS0059 Drawing Nos. LNC019 GA-01-02-03-04&05 - V.3**

Enclose map showing the cell centre and adjoining cells if appropriate:

Please see attached the Technical justification document pack - **LNC013 – EAS0059 technicaljustification.pdf** forming a part of this application along with coverage plots clearly demonstrating the technical need for this site

Type of Structure (e.g. tower, mast, etc):

*existing 15m lattice tower*

**Description:**

The proposed development is as shown on attached drawings LNC019 GA-01-02-03-04&05 - V.3. This will comprise the removal of the existing 15m lattice tower to be replaced with a new 15m lattice tower on land around 15m from the existing compound. All existing Airwave apparatus including the tower and ground-based apparatus will be removed from the existing compound. Within the proposed new compound and on the new tower, the existing Airwave antennae and dishes with cabling will be attached. The existing Airwave cabin and meter cabinet within the existing compound will be relocated to the new compound.

In addition, 3 x EAS antennae at a height of 13.3m (to the centre line) and 2 x 600mm link transmission dishes at a height of around 13.3m would be attached to the new tower. At ground level and within a foul weather enclosure there would be installed 4 x cabinets housing electronic apparatus in addition to a generator, a 1.2m in diameter pole mounted 'VSAT' dish and an electricity meter cabinet. There will be additional ancillary equipment and cabling, all as shown on the drawings and within the Airwave compound which will be fenced off with a new 1.8m 'exmesh' fence topped with barbed wire. The existing route to site through the operational trout farm will be retained albeit upgraded and repaired in parts (an overall distance of circa 300m)

Overall Height:

Existing 15m lattice tower

Height of existing mast (where applicable):

15 Metres

**Equipment Housings:**

The installation of a 'Foul Weather Enclosure' measuring approximately (height) within which will be installed.

FWE - 2.5m x 2.5m x 2.95m

**EAS Cabinets**

- 1 x ENB Euro
- 1 x Emerson M35
- 1 x Commscope Viper
- 1 x Atlas Copco QIS35/10

- 600 x 750 x 2100mm
- 708 x 787x 1769mm
- 600 x 520 x 1406mm

The existing Airwave TFL cabin measuring 2.7m x 2.7m x 2.79m (h) is to be relocated from the existing compound to new compound	
Generator	1.7m x 0.9m approx.
Meter (Elec) cabinets x 2	1.0m x 0.45m x 1.295m
VSAT dish on Tripod	1.2m diameter dish
<b>Materials (as applicable):</b>	
Tower/mast etc – type of material and external colour:	Galvanised steel - grey
Equipment housing – type of material and external colour:	Steel cabins and cabinets – All grey in colour.

**Reasons for choice of design:**

In designing the proposed upgraded, the applicant has sought to achieve a balance between technical requirements (such as antennae height) and minimising visual impact as far as practicable. The proposed development makes use of an existing and established communications site location and the additional visual impact will be minimal from most public vantage points, please see further comment later as regards the photomontage report submitted with this application

When designing a radio base station, it is necessary to incorporate certain vital elements and to work around several technical constraints. There are three main elements to a radio base station; the cabins / cabinets which contain the equipment used to generate the radio signals, the supporting structure, and the antennas and dishes attached thereon at heights determined by the radio network planners and transmission specialists. These emit the radio signals (along with any necessary amplifier or receiver units – ‘Ancillary Equipment’) and communicate with mobile phones and wireless devices and transfer the voice and data back into the main network via the link dishes.

Other elements necessary for the base station to function are the power source (a meter cabinet and a generator in the event that a REC supply cannot be utilised or where back-up power is required in the event of an outage) In this instance there is an established power supply from the grid, however, there remains a requirement for a generator in case of any intermittent supply failure. Other apparatus often referred to in general terms as “development ancillary to” the base station includes feeder cables that link the equipment housing to the antennas, link dishes and, depending on the nature of the site various supports, grillages and fixings.

**Site Design:**

The applicant gives due regard in designing all sites to limit visual impact through good design. The existing 15m tower is not structurally capable of supporting the new EAS equipment required for the deployment of the latest 4G technologies and the existing Airwave Tetra technologies. To this end, a new tower is required, and the proposed height is the minimum required as existing to provide a technical solution. There is a technical requirement to provide vertical separation between each set of antennae (generally a minimum 1m space between the base of one set of antennae and the top of the other set of antenna below), these being (from the top down) Airwave’s Tetra antennae and then the ESN (EAS – Home Office sectorised antennae).

Fencing and security are paramount in relation to the design of the site. As a result, a new 1.8m high mesh fence will be installed around the new compound area/development area. As this is a rural and isolated location which is not manned, security of the installation must be maintained.

It is considered that the appearance of the new antennae and dishes on the tower and additional ground level apparatus consisting of cabinets, emergency generator and VSAT would not seriously impact on the visual amenity of the area; the site is located in a remote location on the away from any settlements, with the added benefit of existing and well established landscaping around the base of the compound and tree coverage to the north assisting in minimising the visual impact of the existing monopole tower which will not change but for the additional EAS antennae.

The additional equipment on the tower and within the existing compound is vital for the new ESN/EAS system to function correctly and achieve line of site for the links, but this is unlikely to be detrimental to the area given the setting.

**Site Access:**

The access route to the site will remain as existing. The established track from the highway to the north-west of the site will be repaired in parts as required - this is to ensure safe and full vehicular access site to site on a 24/7 basis can be available. This is essential for access to the site in the event of emergency repairs being required if, for example, the installation and therefore service in the area fails. It is essential

that such faults are remedied as a matter of urgency at whatever time of day or night and regardless of the weather conditions.

Part of existing access track to site through the Trout Farm – Site:



The design has been prepared to take into full account relevant National and Local planning policies referred to in detail later in this report.

### Flood risk Assessment.

The site is noted to be just within a medium flood risk area:



The existing Airwave site which has been on site for many years is also within the medium risk area and has safely operated during this period without adding to the risk of flooding elsewhere. The new site has been designed to similarly factor in the potential flood risks and effects.

### Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)	<b>Yes</b>	
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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 their own networks and others, they are optimised and operate in such a way that the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. The radio base station equipment 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 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.

#### 4. Technical Justification

##### **ESN (EAS):**

The Applicant considers it to be important to explain the technical justification for the site, given its intended use for the Emergency Services. A radio base station transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. In certain areas (such as the subject site), however, there will be gaps between these cells, resulting in a loss of coverage due primarily to the challenging topography blocking the path of the signals.

This component of the ESN is the Extended Area Services (EAS) which is to provide additional infrastructure to extend the ESN into primarily remote and commercially unviable areas where little or no mobile network operator coverage exists. These are referred to as 'not spots'.

The installation is required to meet the coverage needs in the area along with other publicly accessible areas in. Full details and coverage plots are provided as a supplementary document which state the requirement as *'The primary coverage target area is the 24Km of the Minor Roads (as defined by the ESN) in Dunsop Bridge Area of the Ribble Valley. This area attracts many visitors who partake in walking/rambling, as this is part of the Area of Outstanding Natural Beauty (AONB) of the Forest of Bowland. Full details are within the technical justification forming a part of this application, with predicted coverage area from the site being as shown below in green.'*



This proposal forms part of a programme which will provide the emergency services with nationwide 4G voice and data services and forms part of the nation's Critical National Infrastructure.

The new 4G network which this proposal forms part of, will significantly improve the efficiency of the Emergency Services by giving them access to the latest type of data and applications. For example, the ability for an ambulance crew to send vital patient data on to the hospital to allow staff to make the best preparations in advance of a patient's arrival.

##### **Shared Rural Network (SRN)**



Reference is made above to the importance of the SRN and is stated Government policy. By including the necessary infrastructure in the form of an extendable mast tower which would be capable of supporting an SRN service, this proposal enables SRN to provide improved network services to the surrounding area and would assist in achieving these objectives.

Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

As stated in Paragraph 122 of the NPPF (2018) "*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 4G) ...*" The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. By including the necessary infrastructure (i.e., the replacement 15m lattice tower at Dunsop Trout Farm), this proposal future proofs the site for sharing by the SRN when the roll out is scheduled for this area.

One of numerous benefits of this, on a wider scale, is that this would allow for an increase in home working, by providing the opportunity to create a "virtual office", reducing the need to travel for work as a consequence, which is helpful in supporting the sustainable development agenda.

It is therefore important for 'mobile only' households and any businesses that operate in this part of the Forest of Bowland, together with visitors and others who are staying in or travelling through the area, benefit from the necessary indoor and outdoor RF coverage to enable them to have satisfactory mobile telephone and internet access, and thereby help achieve the Government's objectives for inclusive development and the rollout of modern high-speed communications networks.

It is for these reasons that the National Planning Policy Framework (NPPF) places such emphasis on encouraging the continued rollout of high-speed digital infrastructure networks, of which the proposed redevelopment and future inclusion of SRN at this location might form a key part.

As regards the potential wider use of the site for (SRN) purposes, the development as proposed could very easily be deployed by EE for commercial 4G services and in addition other MNOs could also share the mast by either installing apparatus below the proposed antennae or with a small extension to the top of the proposed tower which has been designed so as to be future proofed in this regard.

### 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 and address	National Grid Reference	Reason for not choosing site
N/A			<i>Please refer to supporting comments below.</i>

The proposal makes use of an existing Airwave telecommunications site which has planning consent at this location and has provided coverage to the surrounding countryside, roads and publicly accessible areas since around 2002.

Due to the aforementioned topography issues, the ESN (EAS) network roll-out has met with very similar coverage issues in the area as Airwave before them. This was successfully addressed with the original site installation by Airwave in this evidently key location that was expertly identified, acquired, and deployed in the optimal position for radio network improvement. As topography and landscapes remain static (bar tree growth) and radio signals of the other MNO's behave similarly to each other, the ESN (EAS) installation has been drawn to this ideal established communications site.

The proposed siting of the ESN (EAS) apparatus was decided upon after analysing both the existing EE network coverage and the other new network planned sites in this rural area. The main aim being to keep the need for any new radio towers to an absolute minimum.

Once the network plan has been devised (taking in to account the characteristics below) all cell search areas are carefully assessed and any site options invariably need to be within a very short radius of the coverage holes / 'not spots'. The ESN (EAS) coverage hole is centred almost exactly where the Airwave tower is located. The strategic location provides the best position for covering this challenging landscape.

Sites need to have the following characteristics:

- They must be environmentally suitable i.e. where any inevitable and associated impacts are within acceptable parameters.
- They must be available on reasonable commercial terms
- They must be capable of being developed, e.g. without unstable ground conditions
- They must have safe and satisfactory vehicular access for construction and future maintenance and servicing;
- They must afford a reasonable degree of security;
- They must be supplied with power or capable of having an economic supply connected.

The methodology employed in the site identification process is conducted in accordance with the sequential approach outlined in the National Planning Policy Framework 2018 (NPPF)) and is as follows:

- a) Mast and Site Sharing
- b) Existing Buildings/Structures
- c) Ground Based installations

Paragraph 43 of the NPPF states that LPAs should aim to keep the number of radio and telecommunications masts sites to a minimum consistent with the efficient operation of the network. The document states that existing masts, buildings and other structures should be used, unless the need for a new site has been justified.

In this instance there is no need for further proliferation of structures and subject to the redevelopment scheme proposed being approved, the network coverage and transmission link needs can be met for all operators. The proposal is effectively the last piece of the technical coverage solution in the local environs so is self-selecting and complies with Local and National planning policies.

Additional relevant information (include planning policy and material considerations):

#### **Environmental Information:**

#### **National Planning Policy Framework (2018) (NPPF)**

The new National Planning Policy Framework, which came into force in July 2018, replaces the first National Planning Policy Framework published in March 2012. The NPPF sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states "*The purpose of the planning system is to contribute to the achievement of sustainable development*", and in paragraph 10 that "*at the heart of the Framework is a presumption in favour of sustainable development*". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives:

*"a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;*

*and*  
*c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

For decision-taking this means:

*"c) approving development proposals that accord with an up-to-date development plan without delay;*  
*or*

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

Further to this, paragraph 38 states that “Local Planning Authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.”

Throughout the NPPF there is strong support for sustainable development which is summed up in paragraph 11.

The NPPF states at paragraph 43 that local planning authorities should support the expansion of electronic communications networks, including telecommunications.

*Paragraph 172 states that Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest’.*

### **Compliance with Planning Policy**

The NPPF clearly highlights the government’s positive stance regarding telecommunications and broadband development and notes the environmental and social benefits telecommunications can provide.

The proposed telecommunications redevelopment fully complies with the objectives of the NPPF. The proposal complies with Local Policy whereby the proposal has been designed to minimise the effect on the Forest of Bowland Area of Outstanding Natural Beauty (AONB) whilst contributing to essential infrastructure improvements for a new 4G telecommunications site for use by the Emergency Services as part of the EAS network and competitive and reliable mobile communications service for the local community and potential for the general public by the inclusion of a future proofed structure for SRN apparatus which could bring about substantial public benefit both socially as well as allowing certain businesses to expand, adapt and thrive and access new markets.

The NPPF states at paragraph 43 that local planning authorities should support the expansion of electronic communications networks, including telecommunications and high-speed broadband. It acknowledges that high quality communications infrastructure is essential for sustainable economic growth. The NPPF also highlights that the development of high-speed broadband technology also plays a vital role in enhancing the provision of local community facilities and services.

### **Code of Best Practice on Mobile Phone Network Development in England (November 2016)**

The Code of Best Practice provides guidance primarily to mobile network operators, their agents and contractors and to local planning authorities in England.

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

The Code highlights that the mobile telecommunications network is a key element of national infrastructure in both economic and social terms and a crucial component of everyday life. It states that “coverage in rural area is recognised as a vital component for maintaining economic activity and social inclusion”. It acknowledges that the pressure on networks to upgrade and improve networks through

changes to existing sites and the development of new sites is constant. With the ever-increasing demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity.

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

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

It acknowledges that Operators should bear in mind that there are certain locations where sensitive siting and design are of increased importance. These include National Parks; AONBs and Sites of Special Scientific Interest. It states that in these areas, attention will need to be paid to the nature of the proposals, the significance of the location, the impact that the proposals could have and the need to reduce any adverse impact. It goes on that operators may sometimes be able to avoid a specific site (e.g. a Listed Building) but not an entire protected area (e.g. a National Park) in which case they should seek to minimise the impact through sensitive design and appropriate siting of the proposals.

Regarding telecommunications in rural areas the Code indicates that the conservation of wildlife and cultural heritage are important considerations in all protected areas, and should be given great weight in National Parks whilst acknowledging that those who represent rural areas recognise that a modern telecommunications infrastructure network is vital for a modern economy and society, and is particularly important in preventing a rural/urban digital divide; while operators recognise the need to respect the environment, particularly in sensitive areas such as National Parks and in siting development in rural areas, operators will take these principles into account.

#### **Relevant Local Planning Policies:**

Careful consideration has been given to the Core Strategy Local Plan 2008-2028 adopted in December 2014. We have noted that the Telecommunications Policy EN23 within the 1998 Ribble Valley Local Plan has not been replaced as it is 'no longer applicable'. We have assumed therefore a reliance on NPPF policies and overarching policies contained within the Core Strategy including:

Key Statement EN2: Landscape with specific reference to development within the AONB.

Key Statement EN4: Biodiversity and Geodiversity

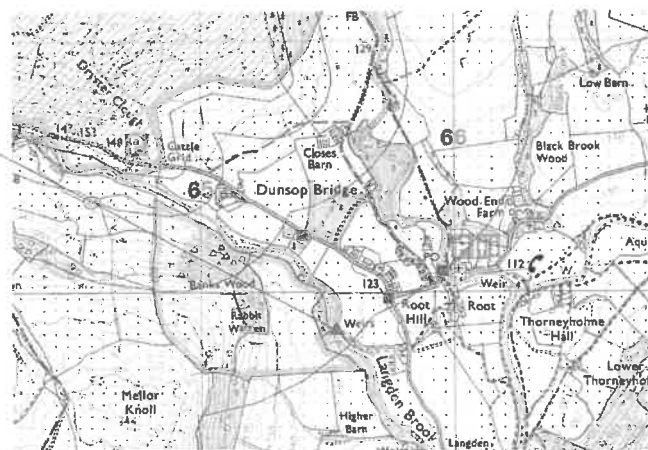
Policy DMG1 – General considerations.

Policies DME1-3 - Environment

#### **Assessment received following pre-application advice:**

No response was received to our request for pre-application advice We have however determined that the site is located within the Forest of Bowland AONB and a SSSI impact zone with a few listed buildings with the village of Dunsop Bridge:

The Site:



The proposed development requires full planning permission due to the increase in width of the new tower rather than proposed height which is the same as existing.

### **Compliance with National and Local Planning Policy**

The NPPF clearly highlights the government's positive stance regarding telecommunications and broadband development and notes the environmental and social benefits telecommunications can provide.

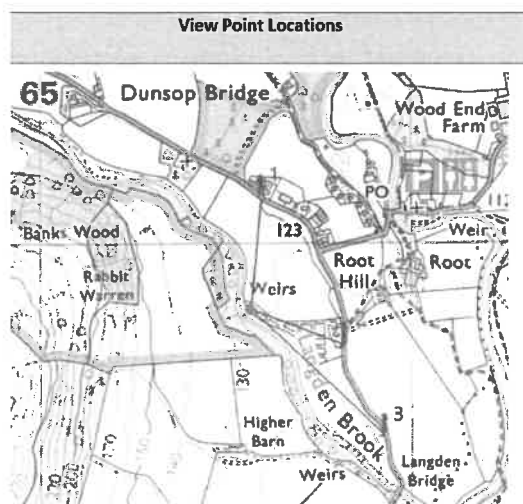
The proposed telecommunications development fully complies with the objectives of the NPPF. The proposal complies with Local Policy whereby the proposal has been designed to minimise the effect on the local environment and AONB whilst contributing to essential infrastructure improvements for a new 4G telecommunications site for use by the Emergency Services as part of the EAS network, making use as it does of an existing tower which has planning consent in place on a site with a well-established telecommunications use attached to it.

In accordance with the NPPF and Ribble Valley Council's wider Local plan policies, care was taken with regards to the design of the proposed development and taking all these factors into consideration, it is our opinion that the proposal meets the requirements of Ribble Valley Council policies and those set out in NPPF.

The proposal makes use of an existing and established telecommunications site for the new ESN/EAS service along with existing Airwave service with no increase in mast height (thereby minimising visual impact significantly) whilst also future proofing the site for SRN purposes.

### **Commentary on Visual Impact:**

A full photomontage report in relation to the proposed development form as part of this application. We have shown below the nearby locations where the photomontage pictures were taken in order to demonstrate the minimal impact anticipated. These are a selection of the closest public vantage points to the site.



The report clearly demonstrates the minimal visual impact the site would have even in the event that this were a new site (i.e., the existing tower were not in-situ) and certainly in relation to any additional impact over and above that as existing. The photomontage speaks for itself in relation to the proposed impact of the new replacement tower which is at the same height as existing.

### **Summary:**

Taking into consideration all the relevant factors set out above, it is considered that this proposal is the optimum solution in terms of providing the required technology coverage for the ESN (EAS) for the emergency services and minimising any adverse impacts on local amenity and the AONB. Please be aware that the height of the proposed mast is the absolute operational minimum to clear the immediate environment and provide adequate, coverage and capacity for the EAS.

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

- With specific regard to telecommunications development, the proposal is fully compliant with the NPPF, Code of Best Practise on Mobile Phone Development, and local policy.
- Site selection was progressed in accordance with the applicant's licence obligations, advice in NPPF and the Code of Best Practice and represents the least environmentally intrusive, technically suitable,

available option as this makes use of an existing structure thereby avoiding the need for a further, separate tower in this locality and avoiding the proliferation of masts in sensitive planning areas.

- The operators' site selection and design strategy is to keep the overall environmental impact to a minimum where the operator will choose a site with the least impact upon the character of the area whilst still being technically feasible in terms of providing signal coverage for the essential infrastructure improvement.
- In this instance, this site is considered to have the least impact upon the character of the local area, bearing in mind the site restrictions the operator is working under and the lack of other suitable possible locations and /or buildings or structures, noting that the mast height will remain the same as existing which has the benefit of planning consent for a long standing and established communication use at this height.
- Weight has to be attached to the purpose of the development and the limitations this by definition presents in terms of siting and appearance, in the context of a setting within the AONB.
- This is now the only site option open to the Home Office for this cell area and this restriction is a material consideration in the determination of the planning application. Alternative options are not deliverable, certainly without the need for further mast installations and by definition such sites, if they exist, offer no objective advantages in terms of siting and appearance over the subject application site.
- Should this application be refused, the requirement to provide this essential service would remain and a further installation at another, possibly more prominent, location would need to be progressed thus leading to the proliferation of masts which runs contrary to national and local planning policies.
- Full consideration has to be given to the resulting public benefits of the proposed development in terms of coverage for the emergency services in the area, coverage for 999 calls from any mobile network phone and the potential for commercial 'Shared Rural Network' (SRN) use. The availability of a mast for this use complies with Government policy and reduces the risk of the further proliferation of masts in the area.
- The visual impact of the proposal is minimal and no greater than existing, from most public vantage points and any perceived harm is far outweighed by the wider public benefit the proposed installation will bring to residents, workers and visitors in and to the area. None of the ground-based elements of the development will be visible from any public vantage point.

**We believe that the public benefit of the provision of ESN/EAS coverage in this area is both obvious and significant, and more significantly outweighs the potential or perceived harm caused by way of any visual impact of the proposed development to the Forest of Bowland AONB which as demonstrated within this statement and supporting documentation is not significant in any event.**

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		Date:	<u>25/05/2021</u>
Signed:	<u>[REDACTED]</u>		<u>[REDACTED]</u>
Position:	<u>Director</u>	(on behalf of the above Operator(s))	<u>Galloway Estates Ltd</u>