Our Ref: 60366

16/6/2016

The Highways Department
Staffordshire County Council
Staffordshire Place 1
Stafford
ST16 2DH

Dear Sir/Madam,

Proposed EE Ltd and Hutchinson UK Ltd Telecommunications Installation Upgrade.

At Swinscoe Hill DNS, Bullgap Lane, Swinscoe Hill on A52, Near Ashbournem Staffordshire, DE6 2HH

I write to formally advise you that, on behalf of EE Ltd and Hutchinson UK Ltd, I am submitting a Prior Approval (GPDO) application to upgrade the current equipment as outlined on the enclosed Developer's Notice.

Yours faithfully,

Copy

Damian Hosker
BA (Hons), MA, MRTPI
Principal Planner
Email: d.hosker@wilkinson-helsby.co.uk

DEVELOPERS NOTICE

Town and Country Planning (General Permitted Development) (England) Order 2015

Proposed development at:

Swinscoe Hill DNS
Bullgap Lane
Swinscoe Hill on A52
Near Ashbournem Staffordshire
DE6 2HH

Grid Reference:

E: 412740, N: 348550

I give notice that WHP on behalf of EE (UK) Ltd and Hutchinson UK Ltd will be applying to: Staffordshire Moorlands District Council under Part 16 Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 for its determination as to whether the prior approval of the authority will be required to the siting and appearance of:

Proposed telecommunications installation upgrade and associated works.

The application and accompanying plans shall be available for public inspection at the offices of the above authority, during usual office hours, at:

The Director of Planning
The Planning Department
Staffordshire Moorlands District Council
Moorlands House
Stockwell Street
Leek
Staffs
ST13 6HQ

Any individual and organisation wishing to make representations about the siting and appearance of the proposed development may do so in writing to the Local Planning Authority At the above address any representations must be received no later than; 14 days after the date below.

SIGNED: WHP

ON BEHALF OF: EE (UK) Ltd & H3G

DATED: 16/6/2016

Copy

EverythingEverywhere Limited
Hatfield Business Park, Hatfield,
Hertfordshire AL10 9BW
Phone: +44 (0)1707 315000

Three UK Limited
Star House, 20 Grenfell Road
Maidenhead, SL6 1EH
Phone: +44 (0)1628 765000

Declaration of Conformity with ICNIRP Public Exposure Guidelines

Certifies that the proposed equipment and installation as detailed in drawing number(s) noted below within the attached planning / GPDO application at:

Cell No:	**60366**
Cell Name:	**SWINSCOE HILL DNS**
Address:	**SWINSCOE HILL DNS** **SWINSCOE HILL DNS, BULLGAP LANE,** **SWINSCOE HILL ON A52, NR. ASHBOURNE,** **STAFFORDSHIRE**
Drawing Number(s):	**EE_CELL 60366_PLANNING_REV -**

Is in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionising Radiation (ICNIRP), as expressed in EU Council recommendation of 12 July 1999 * "on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz)".

* Reference: 1999/519/EC

Date:	**07.06.16**	
Completed by:	**simon taylor**	For and on behalf of EE and Three UK
Position:	**design tech**	
Company	**WHP**	If your company is not listed, please email mark.shaw@mbnl.co.uk

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Swinscoe Hill DNS	Site Address:	Swinscoe Hill DNS Bullgap Lane Swinscoe Hill on A52 Near Ashbournem Staffordshire DE6 2HH
NGR:	E: 412740, N: 348550		
Site Ref Number:	60366	Site Type: Macro	Upgrade

2. Pre Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why: After a phone call to the LPA it was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Annual roll out consultation with LPA

Date of last annual rollout information/submission:	These can be emailed to the LPA on request
Name of Contact:	These can be emailed to the LPA on request
Summary of outcome/Main issues raised:	No comments have been received at the time of submission.

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	6th June 2016	
Was there pre-application contact:		No
Date of pre-application contact:	N/A	
Name of contact:	The Director of Planning	

Summary of outcome/Main issues raised: At the time of preparing this submission, and despite our attempt to engage in pre-application dialogue with the LPA, no comments had been received in respect to the proposals.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green		
Prior to the submission of this application the applicant initiate pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues.			
Summary of outcome/Main issues raised: No responses had been received at the time of submission.			

School/College

Location of site in relation to school/college: There are no schools in close proximity that overlook the site.
Outline of consultation carried out with school/college: N/A
Summary of outcome/Main issues raised: N/A

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

Will the structure be within 3km of an aerodrome or airfield?		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:	16/6/2016		

3. Proposed Development

The proposed site:

Please note that there is no possibility of retaining a "replica telegraph pole" installation on site. This type of installation cannot take the site sharing and 4G upgrade equipment and thus a standard pole has to be utilised.

The proposed site is an established telecommunication installation. This submission is purely to upgrade this existing installation with new equipment to facilitate 4G coverage

The current street works installation is being replaced by a proposed new monopole of the same height and very similar design. The visual implications of this upgrade are negligible. The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. H3G and EE have a network sharing agreement and thus these installations are fully compliant with the NPPF.

Central Government attaches great importance to the design of the built environment and outlines this within Section 7 (para. 56) of the National Planning Policy Framework. It states:

"Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people".

In keeping with the National Planning Policy Framework (NPPF). guidelines of using: *"high quality communications infrastructure"*, the proposed street works monopole design has been selected to minimise visual impact upon the street scene by integrating with the existing street furniture, having similar vertical lines and overall appearance to the street lighting columns that are common feature in the built environment.

The presence of the existing column sets a clear precedent for telecommunications development in this location and indicates that the principle of this proposal is acceptable in terms of siting. As stated above the National Planning Policy Framework advocates site sharing, and as such we believe that there are no sequentially preferable locations within the defined site search area.

The design of the proposed column being the same height of the existing column, is considered to be the least visually intrusive option available. Although it is accepted that the diameter of the shroud will be very marginally increased, it is felt that such a minor increase in the overall bulk of the installation would not detract from the character of the area in which the proposal sits.

Any other proposal to satisfy the identified requirement would result in the addition of a separate ground based column elsewhere in close proximity to the existing structure. In our opinion, such a proposal would, in this instance, unnecessarily add to the clutter in the

streetscene and result in a greater visual impact.

Enclose map showing the cell centre and adjoining cells:
This can be emailed to the LPA on request

Type of Structure	
Description: Description: It is imperative to consider from a planning perspective that this is purely an upgrade to existing installation – The structure already exists. Top of proposed Pole + 12.50m AGL C/L of propose Antennas +11.20m AGL C/L of proposed Dishes + 7.50m AGL Proposed 12.50m High Phase 5 streetwork Monopole to be installed on a new root foundation Proposed 2No. 300ø Dishes to be installed on proposed Phase 5 Monopole Existing Combiner Cabinet on a concrete base to be removed Proposed KOMODO Cabinet to be installed on a new concrete base	
Overall Height: 12.50m AGL	
Height of existing building	N/A
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Tower/mast etc – type of material and external colour:	See drawings
Equipment housing – type of material and external colour:	See drawings

Reasons for choice of design:
Central Government attaches great importance to the design of the built environment and outlines this within Section 7 (para. 56) of the National Planning Policy Framework. It states "Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people". The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. EE Ltd is the new operating company which used to be T Mobile and Orange. In keeping with the National Planning Policy Framework (NPPF). guidelines of using "high quality communications infrastructure", the proposed design has been selected to minimise visual impact upon the street scene

4. Technical Information

ICNIRP Declaration attached ICNIRP 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 the site are taken into account.	Yes	

Frequency:	This information can be emailed to the LPA on request
Modulation characteristics[1]	As above
Power output (expressed in EIRP in dBW per carrier) In order to minimise interference within its own network and with other radio networks, (EE Ltd) 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 (EE Ltd)'s network, the radio base station that is the subject of this application will be configured to operate in this way.	As above
Height of antenna (m above ground level)	See drawings

5. Technical Justification

Reason(s) why site required
The National Planning Policy Framework clearly states that authorities should not question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network. The site is required to provide enhanced coverage for EE Ltd.

[1] The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase modulation
The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation

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

Discounted Options

In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF) following search criteria have been utilised. Firstly consideration is always given to sharing any existing telecommunication structures in the area, secondly consideration is then given to utilising any suitable existing structures or buildings and thirdly sites for freestanding ground based installations are investigated.

This sequential approach is outlined below:

a) Mast and Site Sharing
b) Existing Buildings Structures
c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPPF all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Ofcom Site Finder mast register is always examined prior to the submission of an application.

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

This is an upgrade to existing sites thus no other standalone new facilities have been investigated. A new additional mast to facilitate the upgrade would not be in line with NPPF by upgrading the current facility the most sequentially preferable option has been progressed.

7. Additional Relevant Information

Background to the Proposal

Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using their mobiles in their homes and this means we need to position base stations in, or close to, residential areas.

A further limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However if this overlap is too great unacceptable interference is created between the two cells.

DEVELOPMENT PLAN POLICY.

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and

Compensation Act 2004, it is stated that:

"Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise."

NATIONAL PLANNING POLICY

PPG8 and PPS1 have been replaced by the National Planning Policy Framework (NPPF) (March 2012). This document condenses the advice outlined previously although the broad principles of promoting the expansion of electronic communication networks remain the same:

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied at the Local level. 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.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including;

- Economic Role – contributing to building strong, responsive and competitive economy;
- Social Role – Supporting strong vibrant and healthy communities; and
- Environmental Role – Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes.

Paragraph 19 states that "The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system".

It continues in Paragraph 20 to confirm Central Government advice that "To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century". The following paragraph states "Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure"

Section 4 of the NPPF (Paragraph 29) encourages the "smarter use of technologies" to reduce the need to travel and promote sustainable transport methods in accordance with the central sustainable development thread which travels through the Framework.

The most pertinent section of the NPPF to the proposed development is that contained within Section 5: Supporting High Quality Communications Infrastructure.

There is recognition from Central Government in Paragraph 42 that "Advanced, high quality communications infrastructure is essential for sustainable economic growth" which will in turn play a vital role in developing provisions within the local community of both facilities and services.

Paragraph 43 identifies the need to "keep the number of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network". In doing so, Central Government encourages the use of existing masts, buildings and other structures unless the need for a new site can be justified. Where such new sites are required, it is suggested that, where appropriate, equipment should be sympathetically designed and camouflaged.

Paragraph 45 defines the evidence that should be supplied 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 self-certifies 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."

Confirmation that Local planning authorities must determine applications on planning grounds is also contained in Paragraph 46. In determining applications, it is the contention of Central Government that LPAs 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 (ICNIRP) guidelines for public exposure.

Central Government attaches great importance to the design of the built environment and outlines this within Section 7 (para. 56). It states "Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people".

In respect to good design, decision making should aim to ensure that any proposal deemed appropriate would "function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development" and "respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation".

In determining planning applications "great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area". Paragraph 63.

It is the intention of the NPPF that "Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of

concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits)". Paragraph 65.

Paragraph 66 clarifies that "Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably".

Conclusion

We consider that the development is complaint with the council's policy and that in accordance with Section 38 (6) of the Planning and Compensation Act 2004 permission should be granted for the installation.

We consider the development complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community while minimising visual impact.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

On the basis of a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the requirements of the National Planning Policy Framework and Local Plan Policies.

Damian Hosker BA(Hons) MA MRTPI
d.hosker@wilkinson-helsby.co.uk

07771527070

Contact Details

Name: (Agent)	Damian Hosker BA(Hons) MA MRTPI	Telephone:	01132583565 07771527070
Operator:	EE Ltd & H3G	Fax no:	N/A
Address:	WHP Ponderosa Scotland Lane Horsforth Leeds LS18 5SF	Email Address:	d.hosker@wilkinson-helsby.co.uk
Signed:		Date:	17/6/2016

Position:	Planning Manager	Company: (on behalf of above operator)	WHP