4G SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION STATEMENT PREPARED BY DOT SURVEYING

1. Site Details

Site Name:	St Martins Farm OPTA A	Site Address:	St Martins Farm Zeals Warminster Somerset BA12 6NZ
NGR:	E: 378461 N: 131147		
Site Ref Number:	NDO028	Site Type:	Existing telecoms installation upgrade

2. Check List

Site Selection

Was Wiltshire Council mast register used to check forsuitable sites by the operator or the LPA?		No
If no explain why: 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		

Pre-application consultation with Wiltshire Council

Written offer of pre-application consultation:	N/A	
Was there pre-application contact:		Yes
Date of pre-application contact:	15th September 2023	
Name of contact: developmentmanagement@wiltshire.gov.uk	Local Planning Authority– by email	

Summary of outcome/Main issues raised:

MBNL is committed to providing improved network coverage and capacity, most notably in relation to 4G services. In these unprecedented times of the Covid-19 pandemic, it is recognised that high-speed mobile connectivity is the lifeblood of a community, facilitating educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and facilitating the increased need and demand for working from home, as well as enjoying access to social, media and gaming for leisure time activities.

The pre-consultation invited comments within a two-week period and while the merits of high-speed telecommunications are generally recognised; pre-application has identified the need to carefully consider the risk of increased visual amenity to adjoining residential properties through the siting of telecommunications infrastructure within urban settings.

The e-mail communication included a set of planning drawings, site information sheet and an explanation behind the requirement for an upgraded telecommunications installation. The information sheet also included other sites that have been investigated and discounted.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	AMBER	

Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss the development proposal and identify any site-specific issues.

The site has been given an AMBER rating under the Traffic Light Model ‘TLR’.

Summary of outcome/Main issues raised:

Determination as to whether the scheme in the attached drawings is acceptable.

Full details of the scheme are outlined within the planning drawings - 1194483_NDO028_58126_SP0166_M001.

We consider upgrading an existing installation rather than adding a new one is best suited to extend high-speed mobile coverage to the target community. The scheme is also considered to fit with the Local Authority's critical role in delivering the UK Government's Digital connectivity vision and provides a basis for the Council to support the request for plans to speed up digital infrastructure rollout, as outlined by Ministers on the 27th of August 2020.

School/College

Location of site in relation to school/college: The location is remote and no educational establishments within an 400m radius have been identified within the vicinity of our proposed development.
Outline of consultation carried out with school/college: As above, no education establishments have been identified within the vicinity of our proposed development.
Summary of outcome/Main issues raised: To the best of our knowledge no response was received.

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

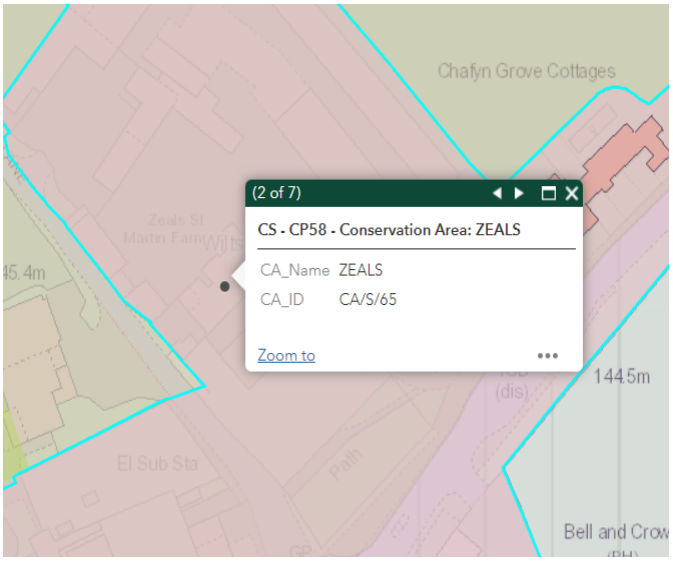
Developer's Notice

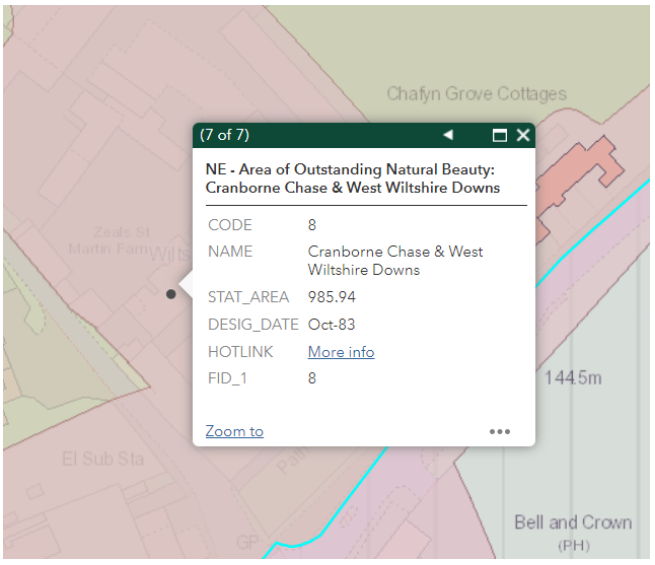
Copy of Developer's Notice enclosed?	Yes	
Date served:	24th October 2023	

3. Proposed Development

The proposed site:
The technical details of this proposal are illustrated within application design drawings as attached. The very nature of upgrading existing telecommunications infrastructure within such a rural setting requires a highly considered balance between the need to extend practical coverage reach with that of increasing risk of visual amenity intrusion. In this location, this telecommunications installation located at St Martins Farm is capable of supporting additional equipment compliment to extend coverage reach across the target area. As such we propose to upgrade this existing telecommunications site. The technical details of this proposal are illustrated within the enclosed application design drawings: - 1194483_NDO028_58126_SP0166_M001. In accordance with governmental guidance this existing site (seen in Figure 1) can be used in this instance via an upgrade rather than having to find a new location. The equipment is considered unlikely to have any material impact on the local area as this is simply an upgrade of the existing installation rather than a brand-new site. The works include a minor upgrade of an existing telecommunications base station, including installation of three antennae at 9.9m, installation of two cabinets, and the installation of GPS node as shown on the attached drawings along with associated steelwork and cabling. Figure 1: An illustration of the proposed site. 

The site is located within Zeal Conservation Area and ANOB (Area of Outstanding Natural Beauty): Cranborne Chase and West Wilshire Downs. This can be seen in Figure 2. The ANOB 'covers 380 square miles of countryside, overlapping the boundaries Of Wiltshire, Dorset, Hampshire and Somerset. It is a diverse natural landscape with rich archaeological and historical significance. Cranborne Chase offers areas of rare chalk grasslands, scientifically important ancient woodlands, and chalk escarpments'. Zeal Conservation Area was designated in April 1973, despite the existing site being located within the conservation area we believe there will be no adverse impacts due to the minor works.





Furthermore, as this is an existing telecommunication site, and the works are minor in relation to the mast, there will be no detrimental visual impact on the ANOB or Zeal Conservation Area.

Type of Structure, upgrade		
Description: The works include a minor upgrade of an existing telecommunications base station, including installation of three antennae at 9.9m, installation of two cabinets, and the installation of GPS node as shown on the attached drawings along with associated steelwork and cabling.		
Overall Height:		9.9m Antennae
Height of existing building		N/A
Equipment Housing:		
Length:		See drawings
Width:		See drawings
Height:		See drawings
Materials		
Antennas etc. - type of material and external colour:	Steel	
Equipment housing - type of material and external colour:	RAL7035	

Reasons for choice of design:
The proposed telecommunications upgrade will support the UK Government Digital connectivity vision and provide a basis for support from the local planning authority to speed up digital infrastructure rollout set by Ministers on 27 August 2020. Such development will facilitate educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home as well as enjoying access to social, media and gaming for leisure time activities. To facilitate 4G capacity and coverage to the surrounding area. In accordance with the requirement set within National Planning Policy Framework (NPPF) guidelines; the proposed antennae design and height has been selected to minimise visual impact upon the area.

4. Technical Information

ICNIRP Declaration attached ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). Public compliance is determined by mathematical calculation and implemented by careful location ofantennas, 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	

5. Technical Justification

Reason(s) why site required
The National Planning Policy Framework (NPPF) clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this, the Applicant considers it important to explain the positive technical justification for the site and how the facility fits into the overall network. The site is required to provide new 4G coverage for MBNL (EE/ H3G) and 4G capacity, improving service in and around the Zeals surrounding area. The cell search areas for 4G are extremely constrained with a typical cell radius of approximately 50m. In general, it would not be feasible to site the installation too far from the target locale

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

Discounted Options
In accordance with the sequential approach outlined in the NPPF, the following search criteria have been adopted. Firstly, consideration is always given to sharing any existing telecommunication structures in the immediate 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 license 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 Mast Data register is always examined prior to the submission of a planning application.

Discounted Options and National Planning Policy:

The National Planning Policy Framework (NPPF) is clear that LPAs should not question the need for the installation under Part 116:

“Local planning authorities must determine applications on planning grounds only. Theyshould not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure”.

Typical to most 4G cell site deployment within the urban environment, this is an extremely constrained cell search area. It is recognised that the very nature of upgrading existing mast infrastructure within a dense urban setting requires a well-considered balance between the need to extend practical coverage with that of increasing risk of visual intrusion. A street pole with associated cabinets is deemed to be the only and most appropriate solution available. The DSA (Designated Search Area) is illustrated herein, together with site locations that were investigated and subsequently discounted.

Discounted Options:

As this is an existing installation we have not searched for other locations as yet on the assumption that we will be able to implement this proposed upgraded scheme to give the local population coverage and capacity to use their telecoms devices. Ultimately consideration was given to utilising the existing telecoms location as per the government guidance.

7. Additional Relevant Information

Background to the Proposal
MBNL supports Government ambition to be a global leader in the next generation of mobile technology set out within its March 2017 white paper, 'Next Generation Mobile Technologies: A 4G strategy for the UK' and expand its mobile network across the Wiltshire Council area and specifically in this instance, to enhance 4G coverage levels in and around this area of Zeals. Modern mobile phone base stations operate at low power and accordingly need to be located within close proximity to the areas they are required to serve. Increasingly, people arealso using mobile devices in the home which requires the installation of upgraded telecommunications infrastructure closer to such residential areas. The proposed scheme has been designed to ensure the fundamental principles of good sitting and appearance are adhered to. The overall impact of the installation on the environment is therefore considered limited when viewed in the context that high-speed mobile connectivity is the lifeblood of a community.

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, 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:

National Planning Policy Framework

The National Planning Policy Framework was revised on 5th September 2023 and sets out the government's policies for England and how these are expected to be applied.

This revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018 and updated February 2019 and revised in July 2021.

The most recent NPPF demonstrates continued government support for telecommunications infrastructure and recognises its importance:

114. Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

115. The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings, and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.

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

a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and

b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.

117. Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:
a) 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, technical site or military explosives storage area; and b) 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 guidelines on non-ionising radiation protection; or c) 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 34 and a statement that self-certifies that, when operational, International Commission guidelines will be met.

118. Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

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 riseto 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. The NPPF recognises the vital importance of high-quality telecommunications and dedicates a whole chapter to this area. Chapter 10 of the NPPF outlines the Governments support for high quality communications. The paragraph extracts highlighted below, clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 114 states:

“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).”

It continues:

“The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for

connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate."

Operators always follow the sequential site selection process. Where an existing site can be shared or upgraded this will always be adhered to before a new proposal is put forward for consideration.

The support for telecoms and the need not to constrain Operators is laid out:

"Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure."

Conclusion

Government considers that high-speed mobile connectivity is the lifeblood of a community. MBNL are committed to providing improved network coverage andcapacity, most notably in relation to 4G services.

Taking into account the site-specific factors and technical constraints, available options and planning constraints, it is considered that the proposed telecommunications upgrade clearly represents the optimum environmental solution to extend coverage to the target community. Where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community, while minimising visual impact.

In accordance with a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the National Planning Policy Framework. On this basis, favorable determination is welcomed for our application.

Contact Details

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Signed:	[redacted]	Date:	24th October 2023
Position:	Planner	Company: (on behalf of above operator)	Dot Surveying Ltd