SUPPLEMENTARY INFORMATION IN SUPPORT OF APPLICATION FOR PLANNING PERMISSION

March 2019

On behalf of
MBNL, EE (UK) Ltd and Three (UK) Ltd

Site Ref. MBNL: ROD086 – Birch Hill Hospital

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Birch Hill Hospital	Site Address:	Birch Hill Road, Wardle, Rochdale, Greater Manchester, OL12 9QB
NGR:	E391863, N 416378		
Site Ref Number:	MBNL, ROD086	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: Criteria not relevant because it is proposed to upgrade an existing base-station.		
Was the industry site database checked for suitable sites by the operator:	Yes	**No**
If no explain why: Criteria not relevant because it is proposed to upgrade an existing base-station.		

Pre-application consultation with LPA

Was there pre-application contact:	**Yes**	No
Date of pre-application contact:	11/03/19	
Name of contact:	TBC	

[1] Macro or Micro

Summary of outcome/Main issues raised: A consultation letter with supporting information and drawings was sent to the LPA by email to invite the LPA for pre-application discussions. At the time of writing, no consultation response had been received. Lines of communication will remain open throughout the application process.

Community Consultation

Rating of Site under Traffic Light Model:	Red	**Amber**	Green
Outline Consultation carried out: The proposal was rated as Green in accordance with guidelines set within the Code of Best on Mobile Network Development (published 2016). Accordingly, consultation letters and plans was sent to the Council Members. The relevant town or parish council would also be consulted, however no such body was identified.			
Summary of outcome/Main issues raised: At the time of writing, no consultation response had been received. Lines of communication will remain open throughout the application process.			

School/College

Location of site in relation to school/college: Wardle Academy.
Outline of consultation carried out with school/college: A consultation letter and plans were sent to Wardle Academy inviting comments on the proposal.
Summary of outcome/Main issues raised: At the time of writing, no consultation response had been received. Lines of communication will remain open throughout the application process.

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: Not applicable.		

Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	No
Date served:	27.03.19	

3. Proposed Development

The proposed site:
The application site is set behind the grounds of Birch Hill Hospital, accessed from Batemans Avenue. The hospital site is located to the south and the west of the site with open space to the north and east of the site. Tall dense vegetation is adjacent to the site. The site currently accommodates telecommunications apparatus. This includes a 15m high conifer tree mast supporting radio equipment, and equipment housing cabinets at ground-level. Collectively this apparatus forms a base-station providing mobile communication services to customers on the EE (UK) Ltd. and Three (UK) Ltd. networks.  Figure 1. Site Location
Type of Structure:
Description: Replacement of the existing 15m high conifer tree mast with a new 20m high monopole supporting 6 no. new antennas2 no. new No. 600mm diameter dishes, 2 no. relocated 600mm diameter dishes (relocated from existing structure), 10 no. equipment cabinets, plus associated ancillary works.

Overall Height:	20.0m
Height of existing building:	N/A
Equipment Housing:	

Installation of 10 no. equipment cabinets of moderate size to be located behind fenced area. Cabinets would not be highly visible due to their location behind the fenced area and against a backdrop of mature vegetation. They can be coloured green or grey or an alternative colour can be accommodated.	
Materials:	
Tower/mast etc – type of material and external colour:	The antennas and dishes are made of steel and plastic and proposed to be coloured white to encourage assimilation into the background sky. The monopole is galvanised steel. Alternative colours can be accommodated and conditioned by the LPA.
Equipment housing – type of material and external colour:	Equipment cabinets can be colour grey or green. Alternative colours can be accommodated and conditioned by the LPA.

Reasons for choice of design:

This is an existing site shared between operators EE (UK) Ltd. and Three (UK) Ltd. It is a well-established site and has been providing 2G and 3G technologies to local customers for many years. The proposed new installation and upgraded equipment is required to provide the latest technology and prepare the site for new technology such as 5G. The proposed installation would enable sufficient coverage and meet the local area's capacity for both EE (UK) Ltd. and Three (UK) Ltd.'s customers.

The replacement antennas are larger in size, weight and in number than the existing due to their higher technical capability. The existing tree mast does not have the structural capacity to accommodate the increase in equipment, hence the proposed structure. At present there is no replicate tree mast capable of supporting the proposed antennas, as such a 20m monopole with sufficient structural capacity is proposed.

In the same regard as the existing, the replacement antennas must be allowed to unrestrictedly emit a radio signal meaning they need to be sited at a high position to ensure the radio signal clears all other surrounding structures, such as buildings and trees, with the aim of avoiding signal interference. The larger size of the replacement antennas also necessitates the need for them to be elevated at a higher position.

The above factors have informed the scale of the proposed replacement mast which is the minimum height possible while still meeting structural and radio planning requirements.

The proposed equipment cabinets would be located within a fenced compound. The cabinets need to be sited reasonably close to the antennas that they will serve in order to avoid impractically long cable feeds and the associated electrical losses. The cabinets would be screened from view by fencing, in the same regard as the existing.

Service personnel would continue to access the site via existing roads and access track and there

would be no need for additional carpark spaces.



Figure 2: Exisiting Installaiton

4. Technical Information

	Yes	No
International Commission on Non-Ionizing Radiation Protection public Compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, EE (UK) Ltd and Three (UK) Ltd operate their networks in such a way, that the radio frequency power outputs are kept to the lowest levels to commensurate with effective service provision. 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.		

5. Technical Justification

Reason(s) why site required e.g. coverage, upgrade, capacity:
MBNL is a joint venture owned by EE (UK) Ltd and Three (UK) Ltd. MBNL undertakes the management and network deployment of telecommunications sites on behalf of both EE (UK) Ltd and Three (UK) Ltd. Mobile telecoms networks are now ubiquitous throughout the UK. It is an expectation that an individual

can connect and use their mobile phone whenever and wherever they so require. With the advent of new technology, under the banner of 5G, further advances are proposed and central government has seen the telecoms industry, and in particular 5G, to be at the forefront of economic development.

The expectations are that future telecoms technology will support government policy regarding digital inclusion; improvements in health and social care; assisting in local economic growth; advancing the development of Smart Cities and supporting innovative uses throughout the transport sector for both personal and public travel. In addition, EE (UK) Ltd will be supporting the communications requirements of Emergency Services where further rollout and improvements in the 4G signal is currently being progressed.

At the beginning of March 2017, the Department of Culture, Media and Sport (DCMS) issued an updated UK Digital Strategy (UK Digital Strategy) with the goal of ensuring that the UK delivers a "world-leading digital economy that works for everyone".

The government has noted within the Digital Strategy that the UK lags behind other similar nations in the delivery of fast, reliable, consistent connectivity for its population, wherever they are in the Kingdom. In conjunction with the new Electronic Communications Code (2018), the DCMS wishes to make it easier for operators to upgrade and share their equipment with other operators in order to help increase coverage. The DCMS also sees new technology and improved connectivity and coverage as key to the future growth, both socially and economically, of the UK.

The proposed new installation and upgraded equipment provides the latest technology and the ability to prepare for new technology such as 5G. At the heart of the new legislation, and one of the Government's key aims, is to deliver on the public benefit of having access to a choice of high quality electronic communications services.

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

As the proposed works are to upgrade of an existing telecoms site, the application omits the identification of any other sites in the area. This is consistent with the government's policies, as stated in national planning policy, to keep the number of base-station sites to a minimum and to site apparatus onto existing structures as oppose to installing new ground-based masts.

Local Planning Policy

The relevant policy document is the Rochdale Core Strategy, adopted October 2016 The following policies are relevant to the proposal;

SO3 - To improve design, image and quality of place

To do this we will focus on:

1. Raising design quality and promoting sustainable developments;
2. Improving gateways into the borough and main transport corridors to improve the image of the borough;
3. Protecting and enhancing our heritage and natural assets, the special character of our towns, our countryside, open spaces, river valleys and water features; and
4. Creating new identity and character where it is lacking (e.g. inner areas and road corridors).

DM1 - General development requirements

All development proposals, including changes of use of land and buildings, extensions and alterations, will be expected to demonstrate that they:

a. Are of high quality design and take the opportunity to enhance the quality of the area;
b. Are compatible with surrounding land uses, both in terms of its impact upon those uses and the impact of the surrounding land uses upon the amenities of future residents / users;
c. Do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy;
d. Mitigate against any impacts due to noise, air, dust, light and odour pollution, traffic generation or inadequate access, where such mitigation is identified as being necessary;
e. Provide satisfactory vehicular access with adequate parking, manoeuvring, and servicing arrangements taking into account of the proposed use and location;
f. Do not have an adverse impact on health, through its impact or the effect of existing problems e.g. land contamination, or poor air quality;
g. Provide, or demonstrate the availability of, the service and community infrastructure necessary to meet local needs e.g. local shops, community, leisure and sport facilities and provision of open space;
h. Minimise opportunities for crime against people or property;
i. Take account of ground conditions including unstable or contaminated land - where a potential risk exists, a survey should be carried out and any necessary remedial measures identified and carried out;
j. Incorporate, where appropriate, high quality landscape schemes;
k. Have assessed whether the development may be affected by ground instability;
l. Have considered the availability of water and wastewater infrastructure, and any need for additional capacity; and
m. Do not lead to impacts detrimental to the conservation interests of European Protected Sites.

Assessment

Replacing and upgrading this site is an integral and significant part of the delivering 5G connectivity across the UK. 5G operates across multiple spectrums and therefore requires additional larger antennas and new equipment cabinets. The signals that are broadcast are more prone to the shadowing effect of adjacent buildings, structures and planting and therefore an increased height for the antennas is required to prevent this and allow optimum performance.

The replacement structure is a shared site between EE (UK) Ltd and Three (UK) Ltd and thereby negates the need for a further additional structure in the area. There are no other structures or buildings of significant height in the area which could support this upgrade and therefore a new 20m high installation has been proposed. The upgrade of this site would see its capacity increased and therefore allow both operators to meet current and future demand.

A key consideration is the balance of protecting the visual amenity of an area while also allowing the surrounding land-uses, businesses, residents and commuters to access high quality mobile voice and data services. It should be acknowledged that the presence of telecommunication equipment has been long established at this location.

It is considered that the site is relatively tucked away from nearby vantage points. The principle views of the site are from the access road on the hospital grounds. When considering the visual change it should be noted that the views of the installation from the access road would largely be transient in nature. In addition, it is likely that this road is used principally by employees of the hospital and those using the hospital services. It is assumed that the overall number of the general public accessing the road would be limited.

There is no mock tree solution within the portfolio capable of supporting 5G and as such a monopole installation has been proposed. This slim-line structure was chosen as it is less bulky than a traditional lattice tower. In addition the monopole can be painted to allow it to further assimilate. The equipment cabinets located within the compound would largely be obscured from view.



Figure 3: Exisitng installation viewed from Tempest Drive

Upgrading the site would facilitate increased capacity to meet the current and future needs of the area for the hospital, local businesses, residents and visitors to the area providing improved and more reliable services. It should be noted that reliable and fast mobile and data connectivity has become a necessity and as such users should be able to enjoy essential services where they live, work travel and visit. The upgrade would also futureproof the site and make it 5G ready, delivering notable economic and social benefits.

Additional relevant information:

National planning policy and strategies are material in determining planning applications and in this case provide strong support in favour of the proposal.

National Planning Policy Framework – Supporting high quality communications

The NPPF, para. 112 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.'*

Para 113 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.****'*

Para 116 clarifies that:

> *'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.'*

UK Digital Strategy

In March 2017, the UK Digital Strategy was published by the Department for Digital, Culture, Media & Sport. The strategy is directly relevant to this proposal…

> *'Broadband and mobile must be treated as the fourth utility, with everyone benefiting from improved connectivity. This will play a crucial role in ensuring that everyone, wherever they live and however they connect, can make full use of digital services and* ***benefit from participation in the digital economy****. Improved connectivity also* ***increases innovation and productivity across the economy, bringing significant economic rewards'***
>
> *'****5G is the next generation of mobile connectivity****, and is currently in development. It is expected to represent a significant upgrade: providing* ***ultrafast, low latency, and more reliable mobile connectivity****, able to handle our ever-increasing data requirements. This should present* ***huge opportunities to boost productivity and grow the economy.*** *In addition to giving consumers and business users high quality connectivity, it will also support the development of the* ***Internet of Things: the rapidly-increasing number of connected devices, from connected cars to digital health applications.****'*

Conclusion

The proposed upgrade of this mobile base-station would provide the latest technology and the ability to prepare for new technology such as 5G. The proposal would deliver the Government's objective of the public having access to a choice of high quality electronic communications services. The improved connectivity would also help to strengthen the area's digital economy, innovation and productivity.

The proposal presents an expansion of EE (UK) Ltd. and Three (UK) Ltd.'s electronic communication networks, providing improved services for thousands of local customers. This would be delivered by way of a mast and site sharing arrangement. This approach is fully in accordance with the NPPF.

A key consideration is the balance of preserving the appearance of the local area while also enabling the immediate and wider area to be suitably served by the latest high quality electronic communication services. It is considered that it has been demonstrated that the proposal would lead to less than substantial harm to the character of local area, and any deemed harm would be outweighed by the public benefits, including social and economic benefits. It is considered that on balance the proposal would provide many benefits and as such should be supported.

Contact Details

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Position:	Planning Consultant for Daly International	Company:	(on behalf of MBNL and above operators)