

**SITE SUPPLEMENTARY INFORMATION**

1. Site Details

Site Name	Bank Hill Farm	Site Address	Bank Hill Farm, Bank Hill, Woodborough, Nottingham, NG14 6EF
NGR	E462515 N347380		
Site Ref Number	NGM0002	Site Type <sup>1</sup>	Macro

2. Pre- Application Check List

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

(would not generally apply to upgrades/alterations to existing sites)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why:  The Ofcom database was not used as the proposal is for an upgrade to an existing nearby cell which is proposed to be removed pending positive determination.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: The site is currently used for hosting telecommunications equipment, so as in line with best practice an existing site has been chosen and is being redeveloped. The proposed development is consolidating equipment on to one single, multi-user mast.		

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

Date of written offer of pre-application submission:	N/A
Was there pre-application contact:	N/A
Date of pre-application contact (meeting / response / e mail):	N/A
Name of contact:	N/A
Given the proposal is not for a standalone new mast and is replacing an existing installation which is already established and has previously been accepted by the LPA, pre-application advice was not sought from the LPA.	

<sup>1</sup> Macro or micro

## Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline Consultation carried out:			
<p>In accordance with the Code of Best Practice this site has been given a rating of Green. Existing installations which are being removed as part of this development in the same area, therefore the principle of telecommunications equipment has been established at this location. The proposal is consolidating equipment on to one single shareable mast, directly adjacent to the existing site.</p>			
Summary of outcome/Main issues raised:			
N/A			

## School/College

Location of site in relation to school/college:
The proposal is more than 200m away from any nurseries, schools and colleges.
Summary of outcome/Main issues raised:
N/A

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

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No

## Developer's Notice

Copy of Developer's Notice enclosed	Yes	No
Developer Notice Attached		

## 3. Proposed Development

The proposed site:
<p><b>About Icon Tower Infrastructure Ltd (Icon Tower)</b></p> <p>Icon Tower is a UK based company, headquartered in Lichfield, Staffordshire who provide independent wireless infrastructure sites and equipment and also benefit from being an official Electronic Communications Code ('Code') Operator. It develops infrastructure for all networks to use on an open and non-discriminatory basis. Icon Tower is backed by infrastructure investors and has major plans to invest in digital infrastructure to improve mobile and wireless connectivity in both urban and rural areas. On this basis it provides local communities with the most efficient means to improve connectivity whilst minimising duplicative infrastructure deployments in the future. Icon Tower expects that other mobile operators, rural wireless broadband and other essential networks may also use the mast.</p> <p>Icon Tower does not operate a retail mobile network of its own and instead gathers Lease Premiums to develop its portfolio of infrastructure for the sole purpose of providing access to all wireless network operators on a shared basis. This is undertaken by Icon Tower Ltd's parent company, AP Wireless. AP</p>

Wireless' Investment Portfolio comprises thousands of sites across Europe, Asia, Australia and North and South America.

The four MNOs in the UK, together with over 100 other smaller networks, use Icon Towers infrastructure to deliver a wide variety of services ranging 2G, 3G, 4G and 5G mobile through to fixed wireless broadband, emergency radio services, broadcast and local wireless services.

Icon Tower is committed to the responsible development of wireless infrastructure. Alternative locations are assessed based on strict Town Planning criteria (visual amenity, impact on the local community), balanced against the physical requirements of the mast (radio plan coverage, backhaul line of sight, power and road access). We operate in accordance with the Code of Best Practice on Mobile Network Development (Nov. 2016).

International consultancy Ernst & Young highlighted in a recent report that the independent sector "*can play a valuable role in promoting effective infrastructure use – enabling lower costs, increased coverage for remote areas, and increased retail competition for mobile services*". Ernst & Young further noted that the sector has "*a proven track-record in sharing towers with multiple network operators*" and referenced evidence that independent towers enable 2-3x more connectivity than towers deployed by traditional network operators. (Report on the economic contribution of the European tower sector" March 2015).

Supporting this application will therefore not only secure investment in a high-quality infrastructure asset for the community but also ensure that the mast is deployed by a Code Operator focussed on maximising the use of that infrastructure to enable ongoing improvements to connectivity over the long term.

### **UK Government Policy on Mobile Infrastructure Deployment.**

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, further advances are proposed, and central government has seen the telecoms industry, and 5G, to be at the forefront of economic development.

The expectations are that future telecom's 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.

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 strategy focuses on seven key strands:

- Building world-class digital infrastructure for the UK
- Giving everyone access to the digital skills they need
- Making the UK the best place to start and grow a digital business
- Helping every British business become a digital business
- Making the UK the safest place in the world to live and work online
- Maintaining the UK government as a world leader in serving its citizens online
- Unlocking the power of data in the UK economy and improving public confidence in its use

The government has noted within the Digital Strategy that the UK lags 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 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.

Icon Tower is committed to following through on the Government's aims and to responsible development of wireless infrastructure. This submission forms part of private new investment where there is a specific requirement for an upgrade to the existing radio base station at this location to enhance coverage in the area.

**Description of the Site**

The site is located to the south of Woodborough between Nottingham and Lingwood Lane. The site is currently used for telecommunications equipment and has become part of the existing landscape. The land surrounding the site is of a predominantly rural character but there is a high density of tree coverage to the north means that there will be very limited views from the north, meaning that the proposed mast will be screened from most sensitive receptors.

**Proposed Development**

The removal of an existing 17.5m monopole mast and associated compound, and the installation of a replacement base station which includes a 26.2m monopole sharable mast, 6no. of 4G antennas and 12no. of 5G antennas, 2no. dishes, 7no. cabinets, etc. Ancillary development thereto. This is needed as the existing mast cannot support the required equipment to improve connectivity.

Type of Structure: Monopole Frame	
Height:	26.2m
Equipment Housing	7no. cabinets are part of this proposal
Equipment Housing Colours	RAL7035 (Can be changed to alternative RAL colour on request by LPA).
Column/mast etc:	Galvanised
Fencing	2.4m high palisade fence

**Reasons for choice of design:**

The proposed mast is the lowest height in which the Operators can continue to provide the required level of coverage to the target area. Further options such as a monopole mast were explored, however monopole masts tend to be better suited to more rural areas and are capable of supporting multiple operators' equipment, helping to reduce the likelihood of additional masts in the future. Icon Tower has subsequently deemed that a monopole structure will be better suited to the site. The proposed mast is suggested to remain galvanised in order to assimilate the typical sky colour in the UK, however the Applicant is open to suggestions from the LPA if they feel that there are any other suitable RAL colours to paint the mast.

For the base station to effectively provide coverage to the target area in line with the established network pattern, specific antenna orientations and heights, determined by Network Radio Planners, must be achieved. The mast height is determined by features of the surrounding area such as existing buildings and trees, the antenna must be able to 'see over' any obstructions in order that they do not block the signals from the antennas. To achieve operator's upgrade requirements the maximum height of the proposed antennae on the mast will be 26.2m. The size is determined by the technological requirements by the Operator, in order to provide the reliable signal with greater capacity, reliability and lower latency. The antennae are to be finished in the standard light grey finish, which matches the existing antennae on the installation and help reduce prominence when viewed against the sky.

There is already an acceptance of tall vertical structures in the area with the long-established 1no. telecommunications mast which indicates that the key consideration is the additional effect upon visual amenity, particularly the height increase of the proposed mast.

This proposal, coupled with the complete removal of 1no. existing mast will make an improvement to visual amenity in the area by condensing the potential number of telecommunications sites to one

single mast. The applicant is a neutral party which allows other operators to install their equipment on to the proposed to future-proof the site.

It is, therefore, considered that the proposal strikes a good balance between environmental impact and operational considerations. The proposed height and design represent the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site to deliver the capability for an enhanced service for multiple operators from a single network installation.

#### 4. Technical Information

<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) *.</p> <p>International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.</p> <p>The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.</p>	Yes
--	-----

#### 5. Technical Justification

##### **Enclose predictive coverage plots if appropriate e.g. to show coverage improvement.**

Reason(s) why site required e.g. coverage, upgrade, capacity:

The existing mast cannot support the necessary upgrades. To prevent the proliferation of masts Icon Tower has decided to relocate all existing equipment to one new mast which has the capability for upgrades and the ability to host new and antenna systems and preparing the site for future innovations in telecommunication equipment.

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

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible. New sites are only developed where there are no viable or accessible alternatives. The feasibility of the build and maintenance of the site also needs to be considered.

Improvements in telecommunications technology has led to the existing site becoming unsuitable for Icon Tower, as existing structures cannot support the required upgrades to the existing telecommunications systems currently located on the 1no. mast. To allow for these upgrades as well as future proofing the site for other potential Telecommunication innovations Icon Tower has deemed it necessary to construct a new mast with additional capacity. The additional height is required to ensure none of the existing operators lose coverage as the antennas have to be relocated on to two new headframes on the proposed mast. The proposed height is also required to "see over" the trees within the woodland which are particular problematic when broadcasting signal.

As the proposed development is to replace one existing telecommunication installations which is already established feature in the area, the applicant has kept the proposed new telecommunications on the site of the existing mast. As a result of this an option for a new monopole mast was deemed the best option. As

the surrounding area is of semi-rural/industrial character a monopole frame mast was considered best practice as it permits views through the structure limiting visual impact.

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

As referred to above, the applicant has taken a sequential approach and is seeking to invest and redevelop an existing installation. It is considered that upgrading an existing, established radio base station installation is preferable to pursuing a second base station within the immediate vicinity and on that basis no alternative sites were considered.

It should be noted that the proposed development is proposing to replace existing installations on one single mast which is in full accordance with the Code of Best Practice for Mobile Phone Network Development in England (2016).

Additional relevant information (planning policy and material considerations)

### **National Planning Policy Framework (2021)**

The latest version of the government's National Planning Policy Framework (NPPF) was published in 2021. The Government's policy strongly supports communications infrastructure. Paragraph 114 of the framework document sets out the objectives of the Communications Infrastructure. It states that: "*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 goes on to acknowledge that the numbers of radio and telecommunications masts and the sites for such installations should be kept to the minimum consistent with the efficient operation of the network. Paragraph 116 indicates that local planning authorities should not impose a ban on new telecommunications development.

NPPF paragraph 118 sets out a clear message to local planning authorities on health issues and the need for telecommunications systems. It states 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*".

Throughout the NPPF there is strong support for sustainable development which is summed up in paragraph 10 which states '*At the heart of the Framework is a presumption in favour of sustainable development*'.

### **Code of Best Practice on Mobile Phone Network Development in England (2022)**

The Code of Best Practice provides guidance primarily to mobile network operators, their agents and contractors and to local planning authorities in England. It is also useful guidance in Northern Ireland, Scotland and Wales too.

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.*

The proposed mast is considered to be an upgrade of the two existing masts and completely supports the National Policies of all four UK Nations by allowing numerous future operators to share one single site, keeping the network to a minimum. The proposed mast has been sited on the land of the existing installation. The proposed mast has been intentionally sited near trees which offer a great level of screening, particularly at the base of the mast which includes the fencing and cabinets.

### **UK government policy on mobile infrastructure deployment**

The UK government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks.

*"The Government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile devices anywhere they go".* DCMS, May 2016.

The last few years have seen a number of UK-wide initiatives to improve coverage including:

- Coverage commitments in the 4G LTE spectrum awarded to Telefonica O<sub>2</sub> (February 2013) to deliver mobile broadband with 98% indoor premises coverage by the end of 2017
- National commitment by all four MNOs (December 2014) to deliver 90% geographic coverage by 2017
- Mobile Infrastructure Project (MIP) – investment by DCMS of up to £150m (to March 2016) in towers to deliver connectivity in complete mobile not-spots.
- Changes to the Permitted Development rights afforded to communications code operators (such as Icon Tower) to allow new networks to be rolled out more efficiently.
- Changes to the Electronic Communications Code (December 2017) to allow mobile operators to more easily roll-out new communications infrastructure.

### **Introduction**

It is acknowledged that the site is located within the Green Belt. Paragraph 138 of the NPPF (2021) states that "The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".

With the exception of a handful of developments, most development is deemed inappropriate in the Green Belt. Paragraph 149 of the NPPF (2021) states that "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- a. buildings for agriculture and forestry;

- b. the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c. the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d. the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e. limited infilling in villages;
- f. limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g. limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
  - o not have a greater impact on the openness of the Green Belt than the existing development; or
  - o not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Paragraph 150 of the NPPF (2021) also states that “certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

- a. mineral extraction;
- b. engineering operations;
- c. local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- d. the re-use of buildings provided that the buildings are of permanent and substantial construction;
- e. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- f. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

It is considered that a telecommunications mast does not fall comfortably within any of the above criteria, therefore very special circumstances are demonstrated below.

### **Demonstrating Very Special Circumstances**

#### **UK Wireless Infrastructure Strategy**

There is widespread support, both at a local and National level for improving wireless connectivity in the UK. The latest UK Wireless Infrastructure Strategy, produced by the UK Government sets out a policy framework to affirm the unwavering commitment to extending 4G coverage to 95% of the population, deliver high quality 5G to all populated areas in the UK by 2030, and investing £40 million to drive take up of innovative 5G-enabled services for businesses and the public sector. It also sets out a comprehensive 6G strategy to harness and develop the UK’s strengths in future telecoms, and to ensure that the UK can influence and benefit from the development of 6G in a way that meets the UK’s future connectivity needs. The Strategy does outline challenges which need to be addressed to ensure the UK can meet its ambitions set out in the strategy. The following points have been outlined by the Government as the main challenges or barriers to meeting the targets:

- high costs of upgrading and maintaining networks are exacerbated by falling revenues and global inflation
- we still need to overcome uncertain demand for 5G-enabled services and continuing practical barriers to network deployment need to be overcome
- many of the economic benefits we have identified require significantly higher quality connectivity than is likely to be deployed in national public networks - for example, smart factories, where remote repairs and self-driving vehicles can significantly improve productivity, may require a dedicated private network
- 5G roll-out in the near term is likely to focus on urban areas, where the commercial returns are more certain
- research we commissioned shows significant variation in the quality of mobile coverage in different parts of the country over the next decade - economically important areas like Freeports and industrial parks could be underserved
- new and existing applications also require access to spectrum - but this is a finite and increasingly contested resource.



Market dynamics are also changing:

- newly emerging operators including private network, satellite and neutral host providers – have a key role to play in delivering advanced wireless connectivity
- demand is uncertain as connectivity moves beyond smartphones to enable an array of new, innovative use cases, businesses and the public sector will need to navigate an increasingly complex ecosystem to get the connectivity they require. As many businesses and local authorities do not yet clearly understand the benefits 5G offers or how they can effectively deploy 5G enabled services to realise these benefits, there is no clear articulation of the demand for higher quality services. In turn, this makes it more challenging for providers to make the business case for investment.
- private networks are increasing in number, powering innovative use cases in key sectors. To unlock the full benefits of digital connectivity, it will be essential to build, design and manage private telecoms networks securely. Our planned call for information on the security of private telecoms networks will help us to better understand how dependent critical sectors are on private telecoms networks and consider how the government can help ensure their secure development.

The proposed mast aims to address many of the challenges outlined above. Icon Tower are a neutral host provider who have deemed it fit to invest in this location, at a time where many network operators are scaling back their roll out programmes and when other neutral host providers are slowing their roll-outs down. The proposed mast also allows for multiple operators (including the current 4 UK MNO's (EE, o2, Three and Vodafone), as well as smaller private networks if they come available in the future.

Green Belts cover the periphery of Towns and Cities across the UK where populations are typically higher than more remote, rural areas and where there is still a need for greater 5G and 4G coverage. Due to the inherent limitations with current technologies not being able to provide coverage over vast areas of land, it is inevitable that telecommunications mast will need to be sited *within* the green belt on occasion, such as this case. The proposed mast is replacing an existing mast and has been kept to a minimal height to help reduce any impact on the openness of the green belt as much as practically possible, while still being able to be readily shared with multiple operators to future proof the site, and to ensure a large area of the Green Belt will benefit from the improved 4G and 5G coverage.

Analysis that the Government commissioned from Analysys Mason and Cambridge Econometrics estimates that, if adopted at scale, 5G could enable productivity gains that add £159 billion in cumulative GVA between now and 2035, reflecting a potential annual GVA increase of £37 billion by 2035. 5G can transform our public services and grow the economy, making our factories and workplaces more productive and creating better paid jobs, delivering on this Government's key priorities. 5G is also a foundational technology for other technologies, including augmented and virtual reality (which, according to PwC, could increase UK GDP by £62.5 billion by 2030), AI and machine learning, and will be key to helping sectors across the economy maintain their international competitiveness.

In 2017, the Government set an ambition for the majority of the UK population to have access to a 5G signal by 2027. As we note above, Ofcom reports that (basic, non-standalone) 5G is now available with high confidence from at least one operator outside approximately 77% of UK premises. Coverage from all four operators is much lower at approximately 20%. Development at this location will allow maximum configuration for 4 MNO's, helping drive up the number of UK premises from 20% to a much higher number.

### **Summary**

The investment in this site by a neutral host party (Icon Tower), allows all four UK MNO's (EE, o2, Three and Vodafone), as well as independent operators to install equipment on the mast ranging from 2G – 5G antennas, microwave dishes and further network equipment for specialist networks such as the Emergency Services Network. The ability for any network operator (commercial or private) to host their equipment on the proposed mast directly negates the need for further masts in the immediate area. In time, it is anticipated that further masts in the area are removed and all equipment will be hosted on one single structure. This is directly supported by the NPPF in Paragraph 115 states "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". Paragraph 118 also states 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”.

As demonstrated in the above report, there is a clear need for the telecommunication mast to be located in this area of the Green Belt. It is acknowledged that the proposed mast is larger than the existing, however it will allow multiple operators on one single structure and directly addresses many of the challenges set out in the UK Wireless Infrastructure Strategy to help the Government meet its ambitions in terms of delivering world-class 4G and 5G services. The above outweighs the limited harm to the Green Belt and therefore constitutes very special circumstances.

### **Local Plan**

Local Planning Document, Issues and Options - October 2013, Gedling Borough Council

#### **Design DES 1a 1 - General Design**

Good design is a key aspect of sustainable development and the National Planning Policy Framework requires that robust and comprehensive local design policies are developed. Policy 10 of the Aligned Core Strategy sets out detailed objectives and criteria against which the design of new developments can be judged.

An important part of design is the protection of amenity of surrounding uses. This is an important part of Policy ENV1 in the Replacement Local Plan. The National Planning Policy Framework identifies that impacts on health and quality of life are important elements of amenity. We are looking to identify issues which could impact on amenity under the following areas:

- From the built development - such as overshadowing or overbearing;
- Generated by the development - such as noise or traffic;
- On adjacent buildings - such as impact on renewable energy technologies.

#### **DES 2a 2 - Character Areas**

The National Planning Policy Framework encourages the use of policies to promote or reinforce local distinctiveness while the Aligned Core Strategy requires development to have regard to the local context including any valued townscapes or landscapes. At present the Replacement Local Plan identifies Special Character Areas at Ravenshead and Woodthorpe and we need to consider whether to continue with this approach. Gedling Borough contains 6 conservation areas, and national legislation will continue to apply to these areas to ensure that planning decisions 'preserve and enhance' these areas.

DES 3a 3 - Residential Gardens The National Planning Policy Framework allows for the inappropriate development of residential gardens to be resisted. The provision of new housing within existing built up areas can reduce the amount of Green Belt land that is required to be released and can provide new housing close to existing facilities and public transport. However significant numbers of housing on garden land can result in 'town cramming' and increase pressure on existing services.

#### DES 4a 4 - Building performance

Tackling and adapting to climate change is one of the key aims of sustainable development and the National Planning Policy Framework. The Framework requires us to set local requirements for building sustainability that are consistent with the move to have all homes built to a 'zero carbon' standard by 2016 and based on national standards. Policy 1 and Policy 10 of the Aligned Core Strategy set out requirements for local standards for sustainable construction for developments of more than ten dwellings:

#### DES 5a 5 - Live-Work and Self Build Homes

The Framework requires that local planning authorities facilitate flexible working practices such as allowing business and homes to share the same building. One of the priorities identified for Gedling Borough in the Council Plan 2013/14 is to promote business and self-employment. Many self-employed people start by running their business from their own homes. Planning policy can help facilitate this by ensuring that a proportion of new homes include the provision of rooms that can be used as offices or workshops or by allowing appropriate extensions to existing dwellings. Using a criteria based policy could ensure that any planning application is assessed in a consistent way. Alternatively a Local Development Order could remove the need for planning permission subject to the proposal according with certain parameters (such as height of the building, distance to boundary etc).

#### DES 6a 6 - Space Standards and adaptability

The National Planning Policy Framework requires that robust and comprehensive policies are prepared which set out the quality of development. Policy 8 of the Aligned Core Strategy sets out that all residential development should contain adequate living space.

DES 6c Given the ageing population it is important that new homes are capable of being adapted to suit the needs of different people over the course of their lives. Policy 8 of the Aligned Core Strategy identifies this as a priority. Providing homes that can be adapted to suit the needs of elderly people will also have benefits for families with young children, those who use wheelchairs and others with mobility problems. Providing homes to meet this Lifetime standard (<http://www.lifetimehomes.org.uk/>) may impact on the viability of schemes. Choices will need to be made as to the relative priority that will be given to this issue.

### **Planning Assessment Compliance with Planning Policy**

The development has been designed to be compliant with National and Local Policy. This has been followed through the upgrade of an existing radio and telecommunications structure, rather than the addition of new sites. Additionally, the proposed development has reduced the possibility of criminal damage by the erection of the proposed 2.4m high fence, limiting the ability for anti-social behaviour giving the site a better sense of safety therefore reducing the fear of crime within the locality.

The proposed development arguably improves the design of the area as it reduces the need for multiple base stations in the area. Size, scale, massing, orientation, materials and appearance have all been considered during the design process. The applicant is also allowing the LPA to suggest any alternative RAL colours of the mast structure, fencing and cabinets. Although the mast is taller than the existing at 26.2m compared to the height of 17.5m, this is necessary as the antennas must be able to provide coverage to the wider area, therefore eliminating the need for additional masts in the future. The monopole structure of the mast also assimilates itself with the tree branches in the lower part.

Visual impact has also been reduced by the choice of colours and materials for this development for example the galvanised finish helps the monopole frame to blend with the sky and reduces its visual prominence where it does break the skyline.

There is a very high demand for mobile services in this area and as such is subject to the investment for an upgrade to provide enhanced provision from a single site. It has been demonstrated that the site has been chosen as the most suitable option, upgrading existing equipment on one single mast near to where the principle of development has already been accepted by the Council and has become part of the established landscape and is able to serve the surrounding area, including residents, businesses and visitors to this area.

The National Policy and the recent correspondence from Government ministers to local authorities clearly highlights the government's positive stance regarding telecommunications and broadband development whilst noting the substantial environmental and social benefits telecommunications can provide. We acknowledge that the authority accepts the importance of telecommunications infrastructure and the NPPF guidance. The proposal upgrades telecommunication allowing more and better services to be provided from this tower. This is an important consideration in balancing the importance of the telecommunications infrastructure, against visual impact in line with local and national policy.

### **Summary**

Taking into consideration all the relevant factors set out above, it is considered that this proposal is the optimum solution in terms of enhanced provision from a single site for multiple operators, minimising any adverse impacts on local amenity. The maximum height of the proposed antennas at 30 metres is the absolute operational minimum to clear the immediate environment and provide coverage.

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 National Policy the Code of Best Practise on Mobile Phone Development, and Local Policy.
- Site selection was progressed in accordance with advice in National Policy and the Code of Best Practice and represents the least environmentally intrusive, technically suitable, available option;
- The operator's site selection 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 utilising an existing site;

- The site is submitted as a Full Planning.
- In this instance, this site is considered to have the least impact upon the character of the local area;
- The proposal fully accords with National and Local Policy and should, therefore, it is respectfully requested that it be approved.

## Contact Details

---

<b>Name</b>	Thomas Clarkson MPlan	<b>Telephone</b>	0151 458 3343
<b>Signature</b>		<b>Email</b>	<a href="mailto:tom@entrust-services.com">tom@entrust-services.com</a>
<b>Position</b>	Member of the RTPI	<b>Company</b>	Entrust Professional Services Limited (on behalf of Icon Tower Infrastructure Limited)

---

<b>Name</b>	Neil Gates MRTPI	<b>Telephone</b>	0151 458 3343
<b>Signature</b>		<b>Email</b>	<a href="mailto:neil@entrust-services.com">neil@entrust-services.com</a>
<b>Position</b>	Chartered Member of the RTPI	<b>Company</b>	Entrust Professional Services Limited (on behalf of Icon Tower Infrastructure Limited)

---

<b>Address</b>	Entrust Unit 4 Century Building Tower Street Brunswick Business Park Liverpool L3 4BJ	<b>Operator</b>	Icon Tower Infrastructure Limited
----------------	--	-----------------	-----------------------------------

---