Development Control
Gloucester City Council
PO Box 3252, Gloucester, GL1 9FW
01452 396396
development.control@gloucester.gov.uk
www.gloucester.gov.uk/planning

Application to determine if prior approval is required for a proposed: Development by or on behalf of an electronic communications code operator for the purpose of the operator's Electronic Communications Network in, on, over or under land controlled by that operator or in accordance with the electronic communications code

The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 16, Class A

Publication of applications on planning authority websites

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

Site Location

Disclaimer: We can only make recommendations based on the answers given in the questions.

If you cannot provide a postcode, the description of site location must be completed. Please provide the most accurate site description you can, to help locate the site - for example "field to the North of the Post Office".

Number: 57

Suffix:

Property Name: Land at 57 Hucclecote Road

Address Line 1: Hucclecote Road

Address Line 2: Gloucester

Address Line 3:

Town/city: Gloucestershire

Postcode: GL3 3TL

Description of site location must be completed if postcode is not known:

Easting (x)

386810

Northing (y)

217658

Description

Applicant Details

Name/Company

Title

First name

Surname

MBNL (EE Ltd and H3G UK Limited)

Company Name

Address

Address line 1

Sixth Floor

Address line 2

Thames Tower

Address line 3

Station Road

Town/City

Reading

Country

United Kingdom

Postcode

RG1 1LX

Are you an agent acting on behalf of the applicant?

- [x] Yes
- [ ] No

Contact Details

Primary number

Secondary number

Fax number

Email address

Agent Details

Name/Company

Title

Mr

First name

Nick

Surname

Allan

Company Name

Dalcour Maclaren

Address

Address line 1

Dunmurry Office Park

Address line 2

Anna House (A5 & A6)

Address line 3

37AUpper Dunmurry Lane

Town/City

Belfast

Country

United Kingdom

Postcode

BT17 0AA

Contact Details

Contact Details

Primary number

***** REDACTED ******

Secondary number

Email address

***** REDACTED ******

Electronic communications apparatus

Please specify the type of apparatus to be installed or altered (e.g. call box, mast)

The installation of a new 20m-high slimline telecommunications monopole (with a wraparound cabinet) supporting 12no. 'stacked' antenna apertures and 2no. transmission dishes; plus and 6no. ground-based equipment cabinets; and ancillary development thereto

Please provide further details of the apparatus (e.g. height, size, colour etc)

See Supplementary Information document for further details

Are you replacing an existing installation?

- [x] Yes
- [ ] No

If Yes, please provide further details of the existing apparatus (e.g. height, size, colour etc)

See Supplementary Information document for further details

Additional information

Are you submitting a declaration confirming that the apparatus is in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP)? The emissions from all mobile phone network operators' equipment on the site must be taken into account when determining compliance.

- [x] Yes
- [ ] No

Are you also providing a completed Supplementary Information Template (as set out in Appendix D of the Code of Best Practice on Mobile Phone Network Development in England)?

- [x] Yes
- [ ] No

Neighbour and Community Consultation

Have you consulted your neighbours or the local community about the proposal?

- [ ] Yes
- [x] No

Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

- [x] Yes
- [ ] No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact?

- [x] The agent
- [ ] The applicant
- [ ] Other person

Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application?

- [x] Yes
- [ ] No

If Yes, please complete the following information about the advice you were given (this will help the authority to deal with this application more efficiently):

Officer name:

Title

First Name

***** REDACTED ******

Surname

***** REDACTED ******

Reference

Date (must be pre-application submission)

12/05/2022

Details of the pre-application advice received

A formal, paid, pre-app request was submitted to the LPA in May 2022. However, as of the date of this application, 3 months later, no formal response has yet been received.

Declaration

I / We hereby apply for Prior Approval: Development for electronic communications network as described in this form and accompanying plans/drawings and additional information. I / We confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine options of the persons giving them. I / We also accept that: Once submitted, this information will be transmitted to the Local Planning Authority and, once validated by them, be made available as part of a public register and on the authority's website; our system will automatically generate and send you emails in regard to the submission of this application.

- [x] I / We agree to the outlined declaration

Signed

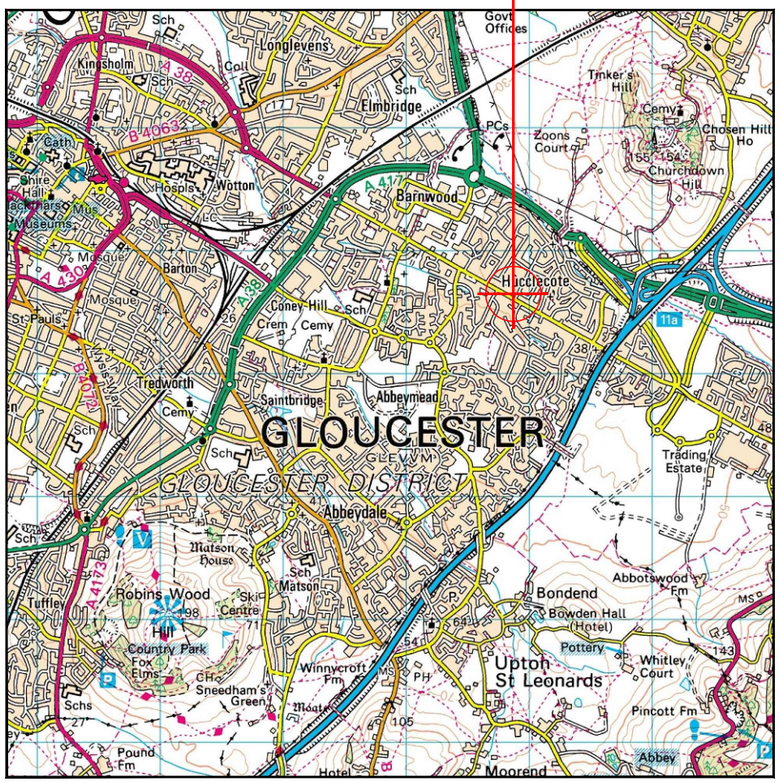
Nick Allan

Date

16/08/2022

V 1.8

SITE LOCATION



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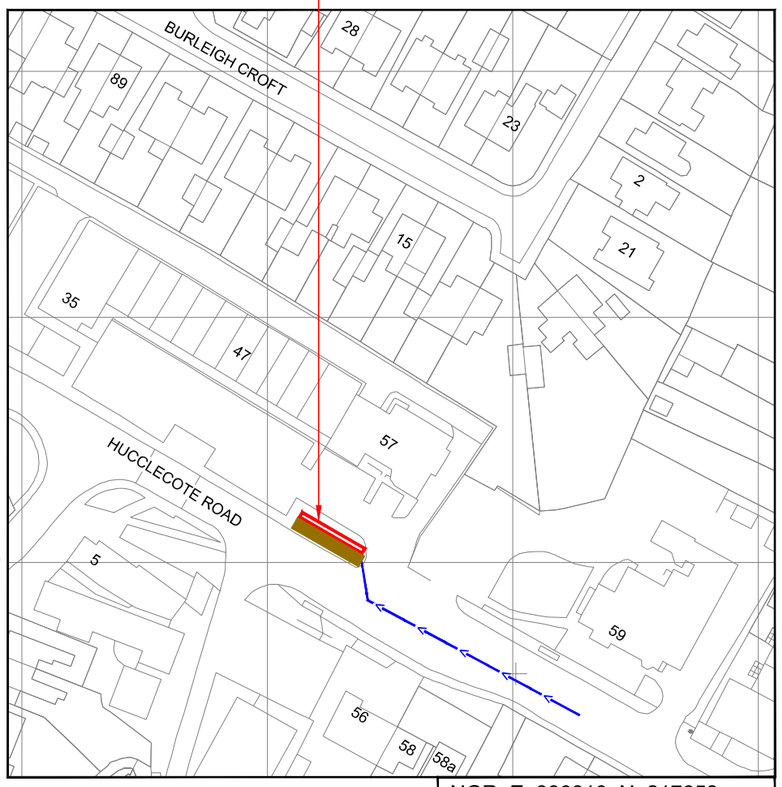
SITE AREA PLAN

0 1:50,000 1km 2

SITE PHOTOGRAPH

N

SITE LOCATION



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NGR E: 386810 N: 217658

SITE LOCATION PLAN

0 1:1250 25m 50

GOOGLE MAPS QR CODE

GOOGLE MAPS
https://tinyurl.com/hx8tpcvb

GOOGLE STREETVIEW
https://tinyurl.com/597v449r

NOTES:

1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

DIRECTIONS TO SITE:
Driving South East on the M5, take exit 11A towards Cirencester/A417. Continue along the A417 and take the following exit towards Stroud/A46. At the roundabout take the 3rd exit onto the A46 and travel until reaching the roundabout. At the roundabout take the 3rd exit onto Ermin Street/Hucclecote Road and continue for 2.12 miles where the site will be located on the right hand side.

Site Provider's Property Boundary:

Access Route To Site:

Access Route:

Master:	MBNL / EE / H3G:	Project:	Purpose of Issue:	Issue:
M001	MBNL	NTQ	Planning	A

Date:	25.04.2022
Drawn:	R.Nugent
Checked:	G.Tinney
Approved:	J.Murray

Revision / Upgrade Description: First Issue

Hutchison 3G UK Limited
450 Longwater Avenue, Green Park,
Reading, Berkshire, England, RG2 6GF
Tel: 01628 765 000
Fax: 01628 765 001

H3G Base Station Information line:
0845 6043000
Available 8am-6pm Monday to Friday

Hatfield Business Park
Hatfield
Hertfordshire
AL10 9BW

Mobile Broadband Network Limited
Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX

Design Consultant: P2ML

Site Name: HUCCLECOTE ROAD RETAIL

Site ID: 1649345

Address: LAND AT 57 HUCCLECOTE ROAD, HUCCLECOTE ROAD, GLOUCESTER, GLOUCESTERSHIRE GL3 3TL

Title: 002 SITE LOCATION PLAN

Project: NTQ

Purpose of Issue: GENERAL ARRANGEMENT

EE Cell ID:	MBNL Cell ID:	3UK Cell ID:
79893	GLO062	-

Master Drawing No: 1649345_79893_GLO062_TBC_M001

Issue: A

100mm
50mm
10mm

Alternative Site Assessment

1. Site Details	
Site Name	Hucclecote Road Retail
Site Address	Land at 57 Hucclecote Road, Hucclecote Road, Gloucester, Gloucestershire, GL3 3TL
NGR	E386810, N217658
Site Number Ref	1649345
Site Type[1]	Macro

The applicants submit that the best town planning solution has been brought forward as part of this application. As outlined in the Supplementary Information Document, clear precedence has been set by the Planning Inspectorate which states that there is no requirement to select the best town planning site when applying for the Local Authority's Prior Approval, and that the selection of another site, in favour of the best town planning option, should not be a determining factor in the assessment of Local Authorities. This is captured in the following appeal cases, all of which were allowed by the Planning Inspectorate. Select quotes from each appeal have been included below:

- May 2018, CTIL vs Sheffield City Council, (appeal reference APP/J4423/W/17/3188962): "*With regards alternative sites, I have noted the appellant's submissions within the supplementary information as well as the contention of interested parties regarding the need for fuller consideration of siting. Nevertheless,* ***I am mindful that even if alternative sites were available, there is no requirement within the Framework or the GPDO for developers to select the best feasible siting where a site as proposed is considered to be acceptable***" (emphasis added).

- October 2020, MBNL (EE Ltd and H3G UK Ltd) vs Elmbridge Borough Council, (appeal reference APP/K3605/W/19/3243927): "*Interested parties indicate that there are alternative sites available for the proposed mast. However, given my conclusion on the main issue it is unnecessary to address the merits of alternative sites.* ***There is no requirement in the Framework or the GPDO 2015 to select the best feasible siting***" (our emphasis).

- April 2021, Cornerstone, Telefónica UK Ltd and Vodafone Ltd vs the Council of the London Borough of Havering, (appeal reference APP/B5480/W/20/3251086): "*I note the Council's reservations regarding the appellants' list of alternative sites, and to that extent I accept that the appeal site has not been shown conclusively to be the least environmentally damaging option possible.* ***But the National Planning Policy Framework (NPPF) does not support that approach. Given that I have found no significant harm, it is unnecessary to consider other alternatives in any more detail***" (emphasis added).

Nevertheless, the Applicants have included an alternative site assessment to assist the Local Authority's assessment of the proposed scheme.

[1] Macro or Micro

Alternative sites considered and not chosen

Site[2]	Site Name and address	National Grid Reference	Reason for not choosing[3]
1	Car Park of Shopping Precinct Hucclecote Road GF	E387145, N217443	The car parking area to the rear of the Shopping Precinct is not expansive and, whist it is unoccupied, there would be sufficient space to accommodate the necessary base station apparatus. However, the demand for parking does appear to be high and would therefore reduce the capacity and level of available parking within the local area. Furthermore, this location sits approximately 400m away from the application site, and approximately 760m away from the existing base station. The Radio Planning Team have confirmed that this option would not provide the necessary coverage to replicate the current footprint provided by the existing base station. As such, an additional ground-based installation would likely be necessary to service any coverage 'gaps' created due to the distance between this option and the existing base station. Therefore, this option has been discounted in favour of the application site.
2	Aldi, Hucclecote Road GF/RT	E386547, N217837	This Aldi site consists of a large retail building and open car park. It therefore has the potential to accommodate a rooftop option and/or a greenfield option. The height of the building, however, limits the possibility of deploying rooftop equipment and replicating the desired coverage footprint. A ground-based mast at this location would reduce the level of car

[2] ETS - Existing Telecomm site, ES - Existing Structure, RT - Roof Top, GF - Greenfield

[3] SP - Site Provider, RD - Redevelopment Not Possible, T - Technical Difficulties, P – Planning
O – Other

			parking within the local area and it was considered, from a town planning and environmental perspective, that this option does not outweigh the application site, and was discounted.
3	Car park of The Royal Oak Pub, Hucclecote Road GF	E386862, N217661	A greenfield solution was investigated at this location. However, given space constraints and the available land, this option was discounted.
4	Car park of The Waggon and Horses Pub, Hucclecote Road GF	E387164, N217530	As with Option 3, above, the limited available land and the space constraints associated with the necessary apparatus, mean that this option does not offer a viable solution. This option was therefore discounted.
5	EDF Energy, Barnett Way RT	E386274, N218099	This rooftop was the only existing structure identified within the local area which had the potential to accommodate the necessary rooftop apparatus. This option has been discounted due to its distance from the existing base station, circa 340m away, and the proximity to another existing base station (a streetworks site on Barnett Way) which would result in a significant overlap of coverage footprints and a subsequent drop in network coverage.
6	Greenways, Barnwood Road GF	E386332, N218099	This location offers an area of green space, which consists of a public park and garden, with a children's play area and tennis courts. It is considered that, whilst a viable solution could be deployed at this location, it would not offer the optimum town planning and environmental solution to the area. As such, this option has been discounted in favour of the application site.

7	Corner of North Upton Lane and Barnwood Road SW	E386426, N217853	This option focuses on a grass verge immediately adjacent to the walled grounds of a new housing development known as Manor Gardens, with the main property identified as being Grade II Listed. This option has been discounted due to the proximity to the Listed Building, as well as having limited space available for the deployment of the necessary apparatus and possible impacts on visibility splays. As such, this option was discounted in favour of the application site.
8	Frontage of Lloyds Pharmacy, 5 Brookfield Road SW	E386778, N217658	This option has been discounted due to evidence of underground services which would restrict the deployment of the necessary apparatus.
9	Barnwood Park and Arboretum GF	E386061, N217808	An option was investigated at this location, within a large green area of public space with formal gardens, walking paths, pond and grazing animals. This location is circa 400m away from the existing base station, and, as such, will not replicate the coverage footprint, and will ultimately lead to a coverage 'gap' within the local area. This coverage gap will need to be filled by an additional base station, and, as such, it is not considered that this option offers a better alternative to that proposed at the application site.
10	Hucclecote Rugby Football Club, Churchdown Lane GF	E387800, N217447	Whilst this location may offer a viable town planning solution, it is situated 1.4km from the existing base station and would therefore not offer a suitable solution to replicate the existing coverage footprint. This option was therefore discounted.
11	Amenity land by the A417 slip-road to M5 GF	E387920, N217642	As with Option 10, above, whilst this location may offer a viable town planning solution, it is situated 1.5km from the existing base station. As such, no replacement base station could be deployed here which would adequately service the

			existing coverage footprint. This option was therefore discounted.
12	Hillview Primary School, Hillview Road GF	E387024, N217897	This option is situated approximately 600m away from the existing base station and would therefore not provide the necessary coverage to replicate the existing footprint. As such, this option was discounted.
13	Amenity land by Upton Close GF	E386353, N217081	This location offers suitable screening via mature tree cover which would assist in reducing the visual impact of the proposed apparatus at this location. However, despite offering a suitable town planning option, this site is situated approximately 800m south of the existing base station and would therefore not provide a complete solution to replicating the coverage footprint. The result would be the creation of a large coverage gap which would then need to be serviced via an additional ground-based installation. As this would lead to the deployment of a second base station within the Council's jurisdiction, this option is discounted in favour of the proposed development.

Contact Details			
Name (Agent)	Nick Allan	Telephone	N/A
Operators	MBNL (EE (UK) Ltd and H3G UK Limited)	Fax No	N/A
Address	Dunmurry Office Park Anna House (A5 & A6) 37A Upper Dunmurry Lane Belfast BT17 0AA	Email address	N/A
Signed	[redacted]	Date	19th August 2022
Position	Town Planner	Company	Dalcour Maclaren
For and on behalf of MBNL (EE (UK) Ltd and H3G (UK) Limited			

Supplementary Information Form

1. Site Details	
Site Name	Hucclecote Road Retail
Site Address	Land at 57 Hucclecote Road, Hucclecote Road, Gloucester, Gloucestershire, GL3 3TL
NGR	E386810, N217658
Site Number Ref	1649345
Site Type[1]	Macro

2. Pre Application Check List		
Site selection		
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, please explain why: No register available		
Was the industry site database checked for suitable sites by the operator?	**Yes**	~~No~~
If no, please explain why: This installation is required to replace the existing rooftop base station at The Creative Centre, 1 Hucclecote Road (NGR: E386520, N217855). The apparatus on this rooftop has been in situ since circa 2005, and was upgraded in 2017. The apparatus on the rooftop has been upgraded a number of times over the intervening period, to ensure that the installation kept pace with advancements in technology. Now, however, the base station is to be decommissioned and removed from the Operators network, for reasons beyond the Operator's control. In order to avoid the creation of a large 'coverage gap' within the local area, for the first time in the last 17 years, a new, permanent base station must be deployed prior to the removal of the existing apparatus. As there is an existing base station already in situ, which provides network services to the local area, there is a very specific target area which needs to be serviced in terms of continued, permanent network coverage. No alternative, existing installations would provide coverage to this area. Therefore, a new site within the area is required to replicate, and enhance mobile coverage and service across the wider area. The application site is situated away from residential properties, as far as practicable, amongst mature tree cover and in close proximity to commercial and retail units. This point must be acknowledged by the Local Authority.		

[1] Macro or Micro

Pre-application consultation with local planning authority			
Date of written offer of pre-application consultation	12/5/2022		
Was there pre-application contact?		**Yes**	~~No~~
Date of pre-application contact	19/7/2022		
Name of contact	David Millinship		
Summary of outcome / main issues raised: A formal pre-application consultation enquiry was submitted to Gloucester City Council via the paid-pre app route, on 12/5/2022. This enquiry contained details of the proposed installation, as well as design drawings. Feedback was requested. A further email was issued to the Local Authority on 18/7/2022, querying the timescales expected for feedback. On 19/7/2022, David Millinship, Senior Planning Officer, responded stating that a cyber-attack in late 2021 was leading to delays in pre-application enquiry responses being addressed, and that, if the Agents were agreeable, 'part' feedback could be provided if all responses had not been provided by the statutory consultees. On 9/8/2022, the Agent issued a further email to David Millinship advising that 'part' feedback would need to suffice, as the nature of this application is particularly time-sensitive – i.e. the imminent loss of an established telecommunications base station being on the horizon, and the Applicants keen to understand if the proposed scheme is considered acceptable, in principle, from the Local Authority's perspective. Despite this request, as of the date of this planning submission, no formal feedback has yet been received.			
Ten Commitments Consultation			
Rating of Site under Traffic Light Model	~~Red~~	~~Amber~~	**Green**
Outline Consultation carried out: A pre-application consultation letter was issued to the local Ward Councillor David Brown of the Barnwood and Hucclecote Ward. Detailed design drawings of the proposal were provided alongside the consultation letter and feedback was requested.			
Summary of outcome / main issues raised: A telephone discussion between the Agent and Councillor Brown occurred on 11/8/2022, in which the proposed scheme was discussed. The number, and size, of the ground-based equipment cabinets formed most of the discussion, with Councillor Brown in agreement that the continuation of network services is important. The Agent confirmed that the number of ground-based equipment cabinets has been reduced to the minimum level to ensure the effective			

operation of the base station. It should be noted, however, that these ground-based equipment cabinets qualify as Permitted Development, as per the new regulations.		
School / College		
Location of site in relation to school / college (include name of school / college): Given the distance between the application site and any schools within the local area, it was considered that no consultation was necessary.		
Outline of consultation carried out with school / college (include evidence of consultation): N/A		
Summary of outcome/main issues raised (include copies of main correspondence): N/A		
Civil Aviation Authority / Secretary of State for the 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: NA		
Developers Notice (only required for an application for prior approval)		
Copy of Developers Notice enclosed	**Yes**	~~No~~
Date served	11th August 2022 – Proof of Delivery of Developers Notice included within the application	
3. Proposed Development		

This proposal is required to provide continued mobile coverage to the local area for EE and H3G (known as the operator 'Three'). Network coverage is currently provided by a nearby rooftop installation, which is due to be removed. A permanent, replacement base station must be deployed prior to the removal of the existing installation, or the area will suffer from a loss of communications and data services for EE and H3G. Additionally, the wider mobile networks for both operators will be disrupted if a replacement site, which adequately replicates the lost coverage, cannot be identified and integrated into the network at the earliest opportunity.

EE and H3G have a radio base station located on the rooftop of The Creative Centre, at 1 Hucclecote Road, approximately 300m north of the application site. This base station provides a considerable level of network coverage to the surrounding area, as shown on the accompanying operator coverage plots.

This installation is due to be decommissioned and removed from the rooftop, for reasons beyond the Operator's control. As such, if no permanent, replacement, installation is deployed prior to the decommissioning of the existing apparatus, then network coverage will be lost within the local area for the first time in over 17 years. The proposed development will address this issue by not only replicating the existing coverage footprint, but providing improved connectivity and capacity via enhanced 3G and 4G services, as well as brand-new 5G coverage for both operators.

The proposed development will be located at 'Land at 57 Hucclecote Road, Gloucester, Gloucestershire, GL3 3TL' (NGR: E386810, N217658), hereafter referred to as 'the Site'. Figure 1, below, shows the approximate location of the Site. The Site is positioned on a wide pedestrian footway, immediately adjacent to Hucclecote Road, and within close proximity to a number of commercial and retail units to both the north and south of the application site

Figure 1 – Aerial imagery of proposed site (approximate site outlined in red) (Source: Google Maps 2022)

The Site has been chosen as the most viable town planning solution within the area which will meet the necessary coverage requirements of the Operator. The proposed development will ensure continued mobile network coverage in provided to the surrounding area; providing connectivity, capacity and coverage for local residents and businesses and ensuring the next step in technological progression (i.e. 5G network coverage) is available within this area of Gloucester.

The Site is not located within any Conservation Area, or in close proximity to any Listed Buildings, Ancient Monuments or other Heritage Assets. In addition, the proposed works are not located in close proximity to any designated sites such as SSSIs, SPAs, SACs, or National Nature Reserves.

The Site has been chosen as the most viable option to ensure continued, reliable coverage as the existing equipment on the rooftop of The Creative Centre will soon be decommissioned and removed. As shown in the attached coverage plots, the proposed Site will replicate the existing mobile network coverage within the surrounding areas, providing improved, faster and more reliable connectivity for both local residents and businesses.

The scheme proposes the installation of a 20 metre monopole with 'stacked' antennas (i.e. no shrouded headframe) for two Operators, providing 2G, 3G, 4G and 5G coverage for EE and H3G. Given the level of public reliance on mobile networks, in all settings, which has increased to an unprecedented level since March 2020, the scheme is considered wholly appropriate for the local area and will ensure that the existing coverage footprint is replicated, and will continue to be enhanced (via 5G), once the base station at The Creative Centre is removed. Public reliance on these networks, and the increase in mobile data consumption, will be discussed in more detail within this document, with particular focus on social interaction and the opportunity for large scale 'home-working' as has become relatively normal over the last 3 years.

The 'sharing' of the proposed monopole must be acknowledged. The necessary apparatus to allow this to happen must be deployed, and can be done so via the proposed monopole. Innovative design now allows the antennas to be 'stacked' within the column, rather than being attached to the upper section of the monopole and creating a larger visual impact on the wider streetscene. The proposed monopole is the slimmest solution available to the operators for deployment.

Whilst the applicant accepts that the height of the installation will result in a visually intrusive feature on the landscape, the slimline nature of the development will ensure that the visual impact is reduced as far as practicable. When this impact is assessed against the provision of economic, social and environmental benefits that will be brought forward by the proposal, there is considered to be significant favour towards approving the scheme. The justification for the height of the proposed installation is that the next stage of technological advancement (5G) will be available from this network cell, providing new cutting-edge coverage for two major mobile Operators to the local area.

The proposed apparatus only serves **one** function – to provide mobile network coverage to the local area. The equipment has no other function. As such, the appearance of the equipment, and the height of the equipment, is dictated by functionality and technical constraints. Indeed, the further relaxation of Permitted Development rights by Central Government in early 2022, shows a clear indication that 20m is now the accepted height for new base stations, be that within or outside of designated areas. It should also be noted that this juncture that the associated ground-based equipment cabinets qualify as outright Permitted Development.

The 'siting' of the proposed development has been carefully selected – set away from residential properties, as far as practicable, and adjacent mature and established trees on a wide pedestrian footway. The presence of retail and commercial units and businesses to both the north and south of the application site will assist in reducing any perceived visual impact associated with this application to the maximum extent. It is considered that the proposal in front of the Council is acceptable, as this development will ensure network coverage for two mobile operators is provided to the local area, and nullify the impact caused by the removal of services when the existing base station at The Creative Centre is decommissioned. The proposed development will provide 2G, 3G, 4G and 5G network coverage for EE, and 3G, 4G and 5G network coverage for Three. Additionally, this community will be at the forefront of the next generation of technology (5G). Given the need to integrate a permanent replacement base station, prior to the removal of the existing base station, as well as limited options within the established target area, it is considered that the best town planning solution has been brought forward as part of this application. Ensuring that the current network coverage is replicated is of vital importance, especially given the modern-day circumstances which have come as a consequence of the Covid-19 global pandemic – with workers now adopting a more hybrid working pattern and leading to an inevitable increase in data consumption in all settings – be it residential, urban, retail, commercial or industrial. It should also be noted that EE have been awarded the contract to provide the Emergency Services Network (ESN). This network is currently provided by Airwave. However, over time, the ESN will be gradually migrated onto the EE network, with EE then isolating their 4G network to accommodate the ESN. Naturally, EE can only isolate their 4G network once base stations are of a level to provide 5G coverage. At that point, EE will provide 2G, 3G and 5G commercial network services and 4G will be switched off 'commercially' and will provide the Emergency Services Network for the Ambulance Service, Fire Service and Police Service. This proposal will be 5G-ready at the point of deployment and it is submitted that the provision of the ESN to Gloucester is a material planning consideration, and should be given planning weight when assessing the application. It is considered that the proposal in front of the Council is acceptable.
Enclose map showing the cell centre and existing sites within the cell and adjoining cells:
Coverage Plots are included within the application
Type of Structure (e.g. tower, mast, etc):
Description: The installation of a new 20m-high slimline telecommunications monopole (with a wraparound cabinet) supporting 12no. 'stacked' antenna apertures and 2no. transmission dishes; plus and 6no. ground-based equipment cabinets; and ancillary development thereto.
Overall Height: 20m
Materials (as applicable)

Tower / mast etc. – type of material and external colour	Steel – Light Grey (RAL7035) (unless otherwise suggested by the Local Authority)
Equipment housing – type of material and external colour	Steel – Light Grey (RAL7035) (unless otherwise suggested by the Local Authority)

Reasons for choice of Design

In designing this telecommunications installation, the applicant has sought to achieve a balance between the technical requirements of the Operator and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree.

The application proposes to install a 20m-high telecommunications monopole with 'stacked' antennas and associated ground-based equipment cabinets. This scheme is proposed to replace the outgoing base station at The Creative Centre, 1 Hucclecote Road.

The choice of design at the application site is governed by two main factors; the context and visual amenity of the area; and, the technical requirements.

Technical Objective and Technical Requirements

The objective of this site is to ensure permanent network coverage to the local area is continued, and enhanced, and disruption to the wider network is not caused, when the existing base station is removed. The long-term retention of network services is therefore of paramount importance and at risk until a permanent base station is integrated into the network.

When any telecommunications site is decommissioned, there is an obvious impact on the network. In order to pre-empt any loss of network coverage when the existing site is removed, a new site has been identified which offers the best technical solution and replicates coverage to the target area, provided by the existing installation. If the existing site is removed without a replacement site, there is a two-fold effect – the loss of coverage to the local area; and a greater disruption to the wider network. Each telecommunications site connects to another to create a network. If one network cell is removed, the connection to the adjacent network cells is lost, leading to impacts reaching far further than the immediate consumers.

The proposal has been sited and designed to provide continued coverage to the local area, replacing the existing installation. Should this proposal not proceed, the local area will be left with a large coverage hole once the existing site is removed. This proposal will fill the coverage hole and ensure that there is no down-time within the network, thereby addressing any wider implications for the network itself. The need for the proposed installation is henceforth established and justified. Additionally, the new installation will be 5G ready and therefore able to provide improved network coverage to the local area for two major mobile Operators.

By way of background information, in designing a radio base station it is necessary to incorporate certain vital elements and to work around a number of technical constraints. There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signal(s), the supporting structure that holds the antennas in the air (or fixes them to a building or structure) and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units).

Other elements necessary for the base station to function are the power source (a meter in a cabinet or a generator on sites where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas, link dishes and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

The antenna height is determined by a specialist network radio engineer using specialist software which factors in the area that coverage is required; the relationship between the selected site location and existing cell sites in the linked network; and variances in land levels and elements such as nearby trees or buildings, which can block or weaken signals.

6no. equipment cabinets are required to house the radio equipment and will be positioned in a neat arrangement at ground level.

Visual Amenity

The applicant gives due regard in designing all new sites to limit the visual impact through good design. In this instance, the proposed installation is subject to technical and build constraints. That notwithstanding, it is submitted that the appropriate siting and design put forth will mitigate any potential impact on the site and its surroundings to an acceptable level.

To achieve the required coverage and overall network improvement for EE and H3G, a 20m-high monopole is required. The proposed installation will also be 5G ready at the point of deployment, with the structure capable of accommodating the necessary apparatus ‘within’ itself, thereby avoiding the need to deploy a structure with a wider headframe, or a traditional ‘bubble’ headframe. This innovative design is therefore the smallest and slimmest available to the Operators and has been selected to ensure that any perceived visual impact is reduced as far as practicable. The application site also ensures that the installation will be situated close enough to the target area it is designed to serve. This is a very important factor and must be acknowledged.

Whilst the application site will provide a suitable technical solution for the local area, it is also considered that this location offers an appropriate town planning and environmental solution. The bulk and scale of the proposed equipment has been minimised as far as practicable, with the antennas ‘stacked’ within the structure itself. The apparatus has only **one** function – to provide network coverage to the local area. Its design, therefore, is solely dictated by operational functionality. The height of the antennas has been reduced to the lowest which would provide the required level of replacement coverage.

As this site will be deployed with 5G capability, this application is not to simply address the imminent loss of coverage from the existing base station, but this scheme also proposes a vastly improved network and the provision of 5G technology; the next stage in technological advancement which is being rolled out across the country. In order to provide this next level of coverage, additional equipment and apparatus is required, all of which can be accommodated on the proposed structure and within the provided development.

Additionally, and as discussed within this statement, the proposed development will also provide the new Emergency Services Network (ESN) for the Ambulance, Fire and Rescue, and Police Services. This is an important planning consideration and should be acknowledged in any planning assessment.

Whilst the applicant accepts that there will be some level of visual impact, when this is compared to the numerous social and economic benefits which will be brought forward with the proposal,

it is considered that the application should be deemed acceptable, and therefore receive Officer support.

The applicants encourage the Council to make a clear distinction between 'visibility' and 'harm', when assessing this proposal. At 20 metres in height, the structure will be visible. However, being able to see something does not immediately infer that it is either inappropriate or harmful. The applicants submit that, despite the proposed development being visible, it is not harmful, and that the height of the apparatus is solely dictated by its function. This must be acknowledged by the Council.

As outlined in the General Permitted Development Order, the deployment of mobile phone base stations, up to a height of 20 metres, is accepted in principle by virtue of the legislation. This position has been confirmed by the Planning Inspectorate in a number of appeal decisions.

For example, in allowing appeal APP/E2205/W/20/3261389, which proposed the installation of a 20m-high telecommunications monopole and associated ground-based equipment cabinets, the Inspector included the following in their decision notice:

> *"Part 16 of the Order establishes that* ***the proposal is permitted development*** *and therefore it is accepted in principle by virtue of the legislation****. Furthermore, there is no requirement to have regard to the development plan as there would be for any development requiring planning permission.*** *Nevertheless, Policies SP1, SP6 and ENV13 of the Ashford Borough Council Local Plan to 2030 are material considerations as they relate to issues of siting and appearance. In particular, they seek to secure high quality design and to avoid development that would cause loss or substantial harm to the significance of heritage assets.* ***Similarly, the National Planning Policy Framework is also a material consideration and this includes a section on supporting high quality communications"*** *(emphasis added).*

In another example, in allowing appeal APP/G4240/W/18/3201704, which proposed the installation of a 20m-high telecommunications monopole and associated ground-based equipment cabinets, the Inspector included the following in their decision notice:

> "**The permission granted under the GPDO is equal to an outline planning permission** and the consideration of the proposed development is limited to its siting and appearance, not the principle of the development" (emphasis added).

Due consideration has been given to the process and the proposal put forward is the best available option – it both achieves the technical requirements and does not bring unacceptable harm to the character of the area.

It is anticipated that this installation will become an accepted part of the built environment over time – as is the case with the existing installation at The Creative Centre.

Whilst it is accepted that the structure will be visible, it is considered that the economic, social and environmental benefits brought forward by retaining network coverage across the local area outweighs any harm that the proposal may cause.

It is considered, overall, that the design is appropriate to the site and surrounding area and avoids any unacceptable level of impact.

4. Technical Information		
International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)* 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 H3G (UK) Limited 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 (UK) Ltd and H3G (UK) Limited's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure 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.	**Yes**	~~No~~
Frequency	GSM 1865.5-1846.5 MHz	
Modulation characteristics[2]	GMSK & QPSK	
Power output (expressed in EIRP in dBW per carrier)	56 dBm	

[2] 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.

In order to minimise interference within its own network and with other radio networks, EE (UK) Ltd and H3G (UK) Limited operates its network in such a way that radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of EE (UK) Ltd and H3G (UK) Limited's network, the radio base station that is the subject of this application will be configured to operate in this way.	
Height of antenna (m above ground level)	13.9 – 19.6m

5. Technical Justification

The proposed site is required as a replacement base station, rather than an additional base station, for the area. EE and H3G (known as the operator 'Three') have an existing radio base station located at 1 Hucclecote Road, approximately 350m away from the application site. This existing installation is due to be decommissioned and removed. To ensure network coverage is continued, a new base station must be deployed which will satisfy the current technical needs of the network and ensure continued provision of mobile services within this area, as well as being 5G-ready at the stage of deployment.

The area that this particular network cell covers is substantial, as shown on the accompanying operator coverage plots. In order to ensure that the complete, existing, serviced area is covered, and no coverage gaps are created when the existing installation at The Creative Centre is removed, a new base station is proposed at the application site.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV and downloads. The base stations are connected to each other (by cables or wireless technology) to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. There are several variables that determine the size and shape of each cell.

As base stations are low-powered radio transmitters they each have a limited range, meaning that they generally need to be located close to (or within) the target area which requires coverage. If a base station is moved too far away from the target area, then it is likely that some sections of the target area will remain without the network services which the Operator aims to provide.

When an existing site is lost from the network, as is the case with this scenario, it will result in a very specific "coverage gap" and an alternative site needs to be identified to ensure that this gap is filled. The consequence of not filling this coverage gap is that users of the networks find that the services they previously had access to are either limited or removed. This is what the Operators are aiming to avoid in this instance, with the identification of a new location for a cell site to service this area.

High-quality communications infrastructure is essential for sustainable economic growth and that high-speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.

The UK Government recognises the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. The very high level of mobile phone use and

ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

The Planning Inspectorate too has in recent years continually recognised the importance of this issue and cited it in appeal decisions that have overturned the decisions of local authorities across the UK where there has been a failure to apply due weight to the value of connectivity to social and economic prosperity in the assessment of applications made for telecommunications development, even in protected or sensitive areas.

As an example, in October 2018 the decision of Winchester City Council to refuse prior approval for the installation of a 17.5m high monopole and associated equipment housing, required to replace an established site being lost from Vodafone's network, was overturned by the Planning Inspectorate (CTIL and Vodafone Vs Winchester City Council, appeal reference APP/L1765/W/18/3197522). Within the decision notice, the Inspector stated that:

> "*I attach significant weight to the public benefit arising from the continuation of local service provision…..Having regard to all relevant considerations..* ***my findings are that the proposal's public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area***" (emphasis added).

In October 2020, the decision of Elmbridge Borough Council to refuse planning permission for the installation of a 15-metre-high monopole incorporating shrouded antenna and supporting 2no external dishes was overturned by the Planning Inspectorate (EE Ltd and H3G UK Ltd Vs Elmbridge Borough Council, appeal reference APP/K3605/W/19/3243927). Within the decision notice, the Inspector stated that:

> *"The mast would be taller and thicker than the existing nearby street lighting columns, road signs and overhead cable poles. Due to its height, the mast would be visible in local views from the public domain and from some residential properties in proximity….However,* ***such masts are becoming more commonplace within the urban environment and so it would not appear as an alien or unexpected feature****"* (our emphasis).

In June 2021, the decision of Sheffield City Council to refuse their Prior Approval for the installation of a 20-metre-high monopole and associated cabinets was overturned by the Planning Inspectorate (MBNL Limited Vs Sheffield City Council, appeal reference APP/J4423/W/21/3268791). Within the decision notice, the Inspector stated that:

> "*Paragraph 80 of the Framework advises that* ***significant weight should be attached to the economic benefits of providing and enhancing electronic communications infrastructure.*** *Paragraph 112 advises that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being, and that the expansion of electronic communications networks, including next generation mobile technology, such as 5G, should be supported.*
>
> *The proposal would reinstate 2G, 3G and 4G coverage within the area as well as providing 5G coverage, services would collectively increase network capacity and provide ultra-fast and more reliable mobile connectivity, capable of handling ever-*

increasing data requirements. The development would provide extensive social and economic benefits to individuals, businesses, and public services, including education and healthcare. The Council does not question the social and economic benefits that would result from the proposal but concludes that they do not outweigh the harm found. However, as no suitable alternative sites have been identified, I attach substantial weight to the benefits that would result from the proposal.

In weighing all the above matters, although I have found that the siting and appearance of the proposal would significantly harm the character and appearance of the area, I consider the substantial social and economic benefits of the proposal outweigh the harm identified*"* (emphasis added).

It is considered that when the balancing method advocated in the NPPF is applied to the proposal, where the need and significant public benefit of ensuring the best available network coverage is provided, especially given the current times in which we find ourselves ensconced a hybrid-level of remote working, is balanced against the appearance and level of associated visual impact of the proposed site, that the application proposal is positively in favour and is considered wholly appropriate.

In November 2021, the decision of the London Borough of Hillingdon Council to refuse their Prior Approval for the installation of a 20-metre-high monopole and associated cabinets was overturned by the Planning Inspectorate (MBNL Limited Vs London Borough of Hillingdon Council, appeal reference APP/R5510/W/21/3269903). Within the decision notice, the Inspector stated that:

"*Based on the evidence before me,* ***the height of the monopole would be substantially taller than the mature trees which bound the site. Accordingly, it would represent a significant departure from the established height of existing lampposts with the height of the proposed structure representing a visually dominant addition to the existing environment****. Due to the substantial height of the monopole, and plethora of associated cabinets, the proposal would detract from the pleasing greenery within which it would be located.* ***This would harm the established landscape feature which positively contributes to the surrounding area as well as causing some harm to the visual amenities of surrounding properties, particularly those within converted office premises***. (emphasis added).

"The proposal would also be located relatively close to three Grade II Listed Buildings*. However, because the proposal does not seek planning permission or permission in principle, the duty established within Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, does not apply to this proposal.* ***Despite this, the Framework still requires the heritage implications to be fully considered"****. (emphasis added).*

"Accordingly, ***although the siting and appearance of the proposed development would cause some limited harm to the setting of the nearby listed buildings, I am satisfied that the economic and social benefits of the proposal, would outweigh this harm***" (emphasis added).

Whilst the above appeals relate to the deployment of new ground-based installations, there are also now a number of appeals which have allowed the upgrading of existing installations up to a height of 20m. As such, it is clear that 20m is now the recognised, and accepted, height of

telecommunications apparatus within the streetscene – regardless of setting – be it residential, suburban, commercial, or industrial. Given that the proposal before the Council is for a 20m installation, it is submitted that the same conclusions can be drawn from all four appeal schemes outlined above – in that the high quality provision of telecommunications services, and the public benefits that they provide, is essential to the economic and social prosperity of the local area, and, when compared to the visual impact that each scheme would cause, the development was found in favour. The same assessment can be applied in this instance.

Given that appeals APP/L1765/W/18/3197522, APP/K3605/W/19/3243927, APP/J4423/W/21/3268791, and APP/R5510/W/21/3269903 proposed brand-new monopoles measuring 17.5m, 15m, 20m and 20m, respectively, all were considered to be acceptable, even if they resulted in clear harm to their surroundings. Additionally, appeals APP/E2205/W/20/3261389 and APP/G4240/W/18/3201704, which were discussed in Section Three of this statement, proposed 20 metre-high monopoles and were both also considered acceptable by the Planning Inspector.

The importance of continued, and improved, telecommunications network coverage cannot be underestimated, especially throughout the years 2020 and 2021, when the dependence on these networks has been higher than ever before. This dependence has continued into 2022 as our online shopping, gaming, and social habits have changed, post-pandemic, as well as many people adopting a working-from-home or hybrid work pattern. There are now a plethora of appeal cases which have been considered appropriate by the Planning Inspectorate for installations very similar to the one proposed here, even within close proximity to residential housing.

Very recently, in March 2022, the decision of Broadland District Council to refuse their Prior Approval for the installation of a 17.5-metre-high monopole and associated cabinets was overturned by the Planning Inspectorate (MBNL Limited Vs Broadland District Council, appeal reference APP/K2610/W/21/3280694). Within the decision notice, the Inspector made specific reference to the '*Living conditions of the occupiers of neighbouring properties*', stating that:

> *"**At the location where the mast is proposed to be located there are houses which face onto, but are not accessed from, Dussindale Drive. These houses are set behind hedges and fences and separated from the proposed site of the mast by a cycleway and footpath. They also have front gardens and drives between the front elevation of the house and the cycleway and footpath**. The proposed equipment cabinets would not be visible from these houses. However, **the mast would be visible from the windows of their front elevations"*** (emphasis added).
>
> "*Policy GC4 of the DPD seeks, amongst other things, to consider 'the impact upon the amenity of existing properties' of new development. **Whilst the proposed mast is significantly taller than other street fixtures in the area it has a slim profile and will be finished in a light grey colour**. It is also set off the boundary with existing residential properties with a cycleway and footpath in between the proposed site and the boundary of the houses. In these respects, it is therefore consistent with Policy CG4 of the DPD"* (emphasis added).
>
> "*Moreover, **the residential properties have front gardens and drives between their front elevations and their boundaries. Consequently, given the slim profile of the mast, its light grey colour, and its distance from the front elevations of nearby properties I do not consider that its siting and appearance***

> ***would unacceptably harm the outlook of the occupiers of these properties****"* (emphasis added).

Given that the Planning Inspectorate have, as recently as March 2022, determined that taller installations than the one proposed as part of this application (i.e. a 17.5m-high monopole as outlined in the appeal above), are considered acceptable within close proximity to residential properties, then it should be expected that a smaller installation in a similar setting should be considered equally as acceptable. It is therefore clear that Council support should also be offered to this scheme.

Furthermore, whilst the applicants do submit that the best town planning solution has been brought forward as part of this application, **clear precedence has been set by the Planning Inspectorate which suggests that this should not be a determining factor, and that the best town planning option does not need to be brought forward**.

In October 2020, MBNL (EE Ltd and H3G UK Ltd) vs Elmbridge Borough Council, appeal reference APP/K3605/W/19/3243927, which has already been discussed within this statement, the Planning Inspector included the following in the Appeal Decision Notice:

> *"Interested parties indicate that there are alternative sites available for the proposed mast. However, given my conclusion on the main issue it is unnecessary to address the merits of alternative sites.* ***There is no requirement in the Framework or the GPDO 2015 to select the best feasible siting****"* (our emphasis).

In April 2021, Cornerstone, Telefónica UK Ltd and Vodafone Ltd vs the Council of the London Borough of Havering, appeal reference APP/B5480/W/20/3251086, the Planning Inspector included the following in the Appeal Decision Notice:

> *"I note the Council's reservations regarding the appellants' list of alternative sites, and to that extent I accept that the appeal site has not been shown conclusively to be the least environmentally damaging option possible.* ***But the National Planning Policy Framework (NPPF) does not support that approach. Given that I have found no significant harm, it is unnecessary to consider other alternatives in any more detail****"* (emphasis added).

In May 2018, CTIL vs Sheffield City Council, appeal reference APP/J4423/W/17/3188962, the Planning Inspector included the following in the Appeal Decision Notice:

> *"With regards alternative sites, I have noted the appellant's submissions within the supplementary information as well as the contention of interested parties regarding the need for fuller consideration of siting. Nevertheless, I am mindful that even if alternative sites were available,* ***there is no requirement within the Framework or the GPDO for developers to select the best feasible siting where a site as proposed is considered to be acceptable****"* (emphasis added).

For the avoidance of doubt, the applicants do submit that the best environmental and town planning solution has been brought forward as part of this application, and an alternative site assessment has been included within this statement. It should, however, be noted that this is not required as part of the application, but rather forms part of the justification for site selection and outlines again, that no alternative, better, option could be identified within the local area that would satisfy the necessary technical criteria associated with a new base station.

At the time of writing, our dependence on network services and connectivity is ever more apparent. Restrictions on travel resulting from the Coronavirus pandemic, plus three national lockdowns, have resulted in a massive shift from office based to home working, from physical, professional and social gatherings to virtual ones, and to unprecedented reliance on online shopping and entertainment services. Network usage within suburbs has increased dramatically as less people are travelling to town and city centres than during pre-pandemic times. Maintaining and enhancing the mobile networks is of vital national importance, and it was significant that telecoms was designated as "critical work" during that time. It is anticipated that the current shift towards homeworking and online services will persist, to a lesser degree, in the future. It is vital that the infrastructure is in place throughout the UK to meet this demand, and the needs of the public.

The benefit of having a strong and resilient network has been highlighted in the last 30 months following the sudden shift in the network requirements, as the demand on the network in residential areas increased with home-working and home-schooling. Research by Ofcom, Online Nation 2020 found that until early that year, online video calling was used much less than other online communication services, with 35% of online adults using online video calling at least weekly in the 12 months to February 2020. However, in May 2020, this had doubled to 71% of online adult consumers using online video calling services at least weekly, with 38% using them at least daily. Research suggests that 7% of adult internet-users used video calling for the first time as a result of the coronavirus pandemic.

The DCM and the RT Hon Oliver Dowden CBE MP highlighted the need for telecommunications companies to support the NHS by providing the connectivity it needed during the Covid-19 pandemic, stating the following in April 2020:

> *"Telecoms companies and their workers are making a major contribution to* ***keeping the nation connected during the COVID-19 emergency****, ensuring that people can stay and work from home"* (our emphasis).

In the current climate, with a dramatic shift towards home-working, online shopping and virtual social gatherings, the importance of connectivity for economic, social and physical wellbeing is more apparent than ever before. Infrastructure needs to be in place in order for people to benefit from these services, and it needs to be located in or very close to the areas where the users are located.

The Ofcom Connected Nations 2020 UK Report outlined a sharp increase in both mobile and voice data, particularly during the enforced national lockdowns of 2020. The report states that average call volumes and average call duration increased in the week that national lockdown was introduced in March 2020, with mobile hotspots shifting away from city centres to the suburbs and residential areas as restrictions continued.

Significantly, the same report states that the consumption of mobile data saw a staggering rise of 42%, when compared with the previous year. Additionally, the traffic carried in England in June 2020 (during lockdown) exceeded that carried across the whole of the UK (England, Scotland, Wales, and Northern Ireland) in February 2020 (prior to lockdown).

Research by Online Nation 2020 found in April 2020, internet users in the UK spent an average of 4 hours 2 minutes online each day, 37 minutes more each day per online adult compared with January 2020. This emphasises the importance of telecommunications infrastructure in being able to provide internet users with reliable network coverage and capacity to deal with an increasing amount of time online each day.

In his speech at Connected Britain 2020, in September 2020, Digital Infrastructure Minister, Matt Warman, stated the following:

> *"COVID has altered the way we live, work and, most importantly, stay connected with our family and friends. The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown - and is now more important than ever as we head into recovery. Many of these changes - such as increased working from home - will stay with us for the foreseeable future".*

The implementation of a third national lockdown throughout January, February, March and April 2021 saw a return of most aspects of life associated with the two previous lockdowns, and the same increases in voice calls and mobile data consumption is expected. Mr Warman also stated the following:

> "*The world is in the middle of a digital revolution. COVID has accelerated this process, digitising almost every part of our everyday lives and making the infrastructure that connects us more important than ever. That's why it is at the top of the government's agenda*".

Central Governments' direction of travel is to support the roll-out of 5G technology and this was the case pre-pandemic. This has been emphasised by the Government's relaxation of Permitted Development rights, allowing Operators to more effectively and efficiently meet the needs of the general public and ever-increasing demand for mobile data consumption. Since its initial roll-out in 2019, Operators have continued to deploy 5G across the UK, largely via the upgrading of existing base stations. Around 3,000 base stations now carry 5G technology. Mr Warman also confirmed that legislative reforms were being undertaken to make it easier for Operators to deploy and upgrade telecommunications base stations.

In May 2021, Mr Warman also wrote to Local Authority Chief Executives in England, making it clear to Local Authority's that they have a role to play in supporting improved connectivity, and also stating the following:

> "*Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data is increasing rapidly, and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality mobile connectivity.*
>
> ***The Government is committed to extending mobile network coverage across the UK and providing uninterrupted mobile signal on all major roads, and our ambition is for the majority of the population to have access to a 5G signal by 2027****. Last year we agreed a £1 billion Shared Rural Network deal with the UK's mobile network operators to extend 4G mobile geographical coverage to 95% of the UK by 2025"* (emphasis added).

Notwithstanding the Covid-19 pandemic, and the increase in network reliance, a look at past data shows that our reliance on mobile networks was increasing year-on-year, prior to 2020. Ofcom's Communications Market Report 2018 provides a figure of 92 million active mobile subscribers in the UK at the end of 2017. It detailed that 78% of adults used a smartphone and that 76% of mobile users were using their devices for web and data access. Figures within the report also confirm that users were spending an increasing amount of time per day using their mobile phone. 68% of participants in the Touchpoints research reported that they "*could not live*

without" their mobile phone (rising to 78% among 25-34s). Whilst not included within the research figures, anecdotal evidence suggests that this number is greater still amongst those aged under 18. Given that two years have now passed since this report, it is anticipated that these figures have increased further. All of which points towards the nation's increasing dependency on mobile services and connectivity.

A YouGov survey, in January 2021, adds further support to this, with 67% of those who were at the time working from home during the pandemic confirming that they had been using mobile data, as opposed the fixed-line broadband, agreeing that access to it would be an important factor when choosing where to live in the future. This rises to 76% for 18 to 34-year olds. The survey also confirmed that 44% of one network Operator's data traffic in January 2021 went to streaming services, such as Disney+, and that 45% of 18 to 24 year olds confirming that they are more likely to use their mobile data for browsing social media.

All of the above occur in a domestic setting. There is a clear need and demand for connectivity and capacity, and it is anticipated that telecommunications infrastructure has become, and will continue to become, commonplace in residential and suburban settings, and on highways verges, such as the application site.

As recognised by the London Assembly's Regeneration Committee within its "*Digital Connectivity in London*" report, published June 2017, digital connectivity is now widely regarded as the "'*fourth utility'*, *an everyday necessity alongside water, gas and electricity*" and also noted that "*mobile broadband is, and will continue to be, an essential complement of fixed broadband*". It is no longer a luxury, but a service essential to modern life.

On a wider scale, the proposal would continue to contribute towards the country's connectivity and digital economy future via the provision of brand-new 5G network coverage for Three UK. Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion, and, on a local scale, it is important to ensure the continuation of established telecommunications networks in this area.

Ofcom's 2018 Communications Market Research Report shows that smartphones are owned by four of every five UK consumers and smart TVs are in almost half of all households. Demand for data continues to grow rapidly for UK consumers, with 1.9GB consumed by an average mobile subscription per month in 2017, (up from 1.3 GB the previous year). The report found that more than seven in ten now use their mobile to access the internet, sufficient coverage is obviously vital for this basic utilities service to be provided.

The UK Government, recognising the benefits to commerce, industry and the public in general, places great emphasis on the benefits of mobile telecommunications to modern life. This position was reinforced by a statement made by then Prime Minister David Cameron in March 2016 when he specifically addressed the vital importance of mobile connectivity for residents and local economies and highlighted that the urgent delivery of the required network improvements is a Government priority;

> *"Ten years ago, we were all rather guilty of leading campaigns against masts and all the rest of it. Our constituents now want internet and mobile phone coverage. We need to make sure that we change the law in all the ways necessary, that the wayleaves are granted, that the masts are built, that we increase coverage and that everyone is connected to the information superhighway. This is substantiated in the most recent budget announcement of 16th March 2016, which commits to provisions for "greater freedoms and flexibilities for the deployment of mobile infrastructure".*

Since 2016, and particularly during the enforced lockdowns of 2020 and 2021, public and business reliance on the established mobile networks has continued to increase. Improved mobile coverage and connectivity is now no longer viewed as a 'luxury', but rather an every-day necessity. This has been further exacerbated as, at the time of writing, the country appears to be adopting a more hybrid-working pattern, split between traditional office working, and working from home. As this 'working from home' naturally occurs within a residential setting, then it follows that the necessary infrastructure and apparatus must be in place to allow this to happen. As such, this type of infrastructure must be deployed within all settings – be it sub-urban, urban and residential areas. It is imperative that existing and established network connectivity and capacity is continuous, with any removal of services needing to be addressed immediately and prior to the removal of the existing base station. This is what is proposed in this application, with a 20m monopole, as proposed in this instance, fully addressing any connectivity, capacity or coverage issues which may arise from the decommissioning of the current base station.

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Additional relevant information
Given the nature of the site search – i.e. a very specific area of Gloucester, in and around Hucclecote Road – there is a very restricted geographical area in which this base station can be deployed, to ensure that the necessary coverage footprint is serviced and replicated. The surrounding area is mainly residential, and, as such, is restricted in terms of opportunities to deploy the required base station. As with any network planning, it is important to strategically position network cells sufficiently apart so that their coverage plots do not overlap (to any significant extent) and that the maximum coverage can be achieved from each separate base station. It is clear that the options within the local area are limited, with none of the alternative options considered to be preferable to the proposed development, in terms of either achievable network coverage or environmental impacts. It is considered that the application site offers an appropriate environmental and town planning solution, whilst simultaneously ensuring the operational parameters of the installation are met. It is considered that there is no better option within the search area, hence the application which sits before the Council. It is considered that the proposal is appropriate to the surroundings and that there is no better alternative location available which will provide the necessary coverage to the local area. It should also be noted at this juncture that there is no requirement for the Applicant to submit an alternative site assessment, nor for the Applicant to select the best town planning option as the application site (see page 15, above). As such, the Applicants have submitted an application in regard to the Council's assessment of whether Prior Approval is granted for this scheme, at this location. The '*principle of the development*' is established within The Order and, as such, no regard needs to be paid to the Council's Development Plan.
Additional relevant information (include planning policy and material considerations): Environmental Information: There is no evidence of protected species at this location, with the surrounding area consisting of largescale development and buildings. The proposal will subsequently not have any potential negative impacts on any sensitive habitats or species. As far as practicable the proposed development has been designed to keep to a minimum the impact on amenity and the design of the development ensures there would be only a limited impact which would not be sufficient to harm visual or residential amenity. As part of the bigger picture within the Council's jurisdiction, the visual amenity of the surrounding area will be protected as only one new ground-based mast is required to replicate the existing base station at The Creative Centre. This can be attributed solely to good siting and the identification of a location within close proximity to the existing base station. If a new base station was proposed which did not adequately replicate the existing coverage footprint, then additional infrastructure would be required elsewhere to 'in-fill' any coverage gaps which are created as a consequence of the removal of the existing base station. Siting and Appearance: It is considered that the proposal utilises the most suitable design available to meet the technical requirement within the very specific technical constraints. As discussed in Section 3 of this

document, this site is required to replace the existing coverage that will be lost when the rooftop installation at The Creative Centre, which currently services this area, is removed.

The proposed development before the Council has been specifically designed for use in urban areas and has been designed (in terms of antenna height) to allow two Operators to 'share' one installation, thereby reducing the number of telecommunications base stations within the local area.

Whilst this application is being brought forward as a 'replacement' cell to the one which is being decommissioned, the fact that it will be 5G-ready at the point of deployment is a significant point of note. This application is therefore not only a 'replacement' of the existing coverage, but will also lead to significant connectivity improvements with the availability of 5G coverage, as well as improved 2G, 3G and 4G network capacity for both EE and H3G (Three) within the local area.

The application site is not located within a designated area, and it is considered that the proposal will not bring about substantial harm to the character of the area but will bring benefit to the public through retained and improved connectivity and communications services. While the applicants do not suggest that the proposal will have no impact, it is considered that when applying the balancing method advocated in the NPPF, the proposal finds itself in favour.

It is important to keep the impact of telecommunications development in the area to a minimum and it is considered that the proposed development achieves this. When considering the benefits of the proposal, the public benefit from retained and improved connectivity and wireless communication services is a significant one. The applicant considers that any perceived visual impact on the area, or skyline, has been mitigated, as far as practicable, through the best design available within the technical constraints of the site, and that this development will provide excellent public benefits – both in the present, and in the future. It is considered that the impact of the development has therefore been reduced as far as practicable.

In this case, it is suggested that the application of the balancing method advocated in the NPPF, for the provision of communications and connectivity services, in the public interest, be utilised to balance the need for continued connectivity with the potential impact of the site. It is considered that when this balance test is applied to the proposal, where the need and significant public benefit is balanced against the appearance and level of associated visual impact of the proposed site, that the application proposal is positively in favour and is considered wholly appropriate.

This has been emphasised by the Planning Inspectorate on a number of appeal cases where, the Planning Inspectorate has ruled in favour of proposed developments of a similar nature, where this balance was applied. Some recent examples of where this balance was applied by the Planning Inspectorate include appeal cases referenced APP/Q3305/W/18/3206555 and APP/L1765/W/18/3197522. Extracts from these appeal decisions are included below for your convenience:

> "*In considering the need for the proposal, Government policy, as set out in the Framework states that advanced,* ***high-quality and reliable communications infrastructure is essential for economic growth and social well-being. In this respect, I have found that there is a need for the proposal which therefore weighs strongly in its favour.*** *As I have found that the level of harm relating to this second main issue would be low, that identified need would outweigh the harm in this case*" (emphasis added).

"*I conclude on this issue that despite the less than substantial harm that would be caused, the* ***public benefits of the proposal would outweigh that harm****"* (emphasis added).

"*9. The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 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… The Council has commented that service provision would be 'adequate' without the proposal, but* ***the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision****"* (emphasis added).

"*13. Having regard to all relevant considerations, including national planning policy and the potential availability of alternative sites, my findings are that* ***the proposal's public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm*** *arising to the character and appearance of the area*" (emphasis added).

Whilst each application needs to be assessed on its own merits, the above appeals (along with a growing number of others, many of which are referenced in the preceding sections of this document) indicate a growing trend, based on national policy and guidance, to favour important utilities and infrastructure developments in the wider public interest when the potential harm is outweighed by the important and unavoidable public benefits they provide. Ensuring continued network connectivity, coverage and capacity, for two Mobile Network Operators, within the Council's jurisdiction is considered a major public benefit.

The selected siting is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding harm to the local streetscene and the surrounding area. The application site has been strategically positioned away from residential housing, as far as practicable, but within close proximity od the existing base station and the target area that the base station is designed to serve. As such, the proposed scheme will efficiently replicate, and enhance, the current coverage footprint of the local area. Additionally, existing vertically engineered structures in the form of street lighting columns, traffic road signs, wooden telegraph poles and overhead power lines, will assist filtering public and road-user views of the proposed development. These features, therefore, will assist the apparatus into assimilating into the wider streetscene with ease.

The selection of a slimline monopole, rather than a lattice tower or a traditional shrouded monopole, has been brought forward to ensure that the size and scaling of the proposed installation is reduced as far as practicable.

The antennas cannot be screened for operational reasons as this would result in an attenuation of the signal and reduced network coverage. However, strategically positioning the proposed installation a reasonable distance from residential properties, is considered that the least-impacting site has been brought forward as part of this application.

On balance, this proposed location is considered to be the optimum location in terms of siting and design, with the limited harm it may impose on the surrounding area being outweighed by

the provision of continued and enhanced services to the area in the public interest. Given the social, economic and environmental benefits that will be brought forward as part of this proposal, in achieving continuous network coverage for the area, it is not considered that the perceived visual impact of this proposal would outweigh said benefits, and that Officer support should therefore be given. As such, equilibrium will be achieved between technical requirements and environmental impact.

Planning Policy Context:

National Planning Policy Framework (2021) (NPPF)

The National Planning Policy Framework came into force in July 2018 replacing the guidance published in March 2012, was updated again in February 2019, and then had a further update in July 2021. The NPPF sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states "*The purpose of the planning system is to contribute to the achievement of sustainable development*", and in paragraph 10 that "*at the heart of the Framework is a presumption in favour of sustainable development*". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

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

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

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

For decision-taking (paragraph 11) this means:

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

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

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

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

The NPPF directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

"*b) infrastructure for transport, **telecommunications** (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat*)"

Leading on from this, paragraph 114 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*". Again, the proposal is entirely consistent with the aims expressed within the NPPF.

Given that there appears to be no timeline as to when things may return to 'normal', in regard to the hybrid-working situation which was caused as a consequence of the global coronavirus pandemic, ensuring that improved network coverage is available to all communities is of paramount importance to the Operators, as well as Central Government. The proposed development at the application site, will ensure 3G, 4G and 5G network coverage is provided to the local area.

It should be noted that paragraph 118 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*". A certificate of compliance with ICNIRP guidelines is included within this application.

It is stated in Section 4 of this statement that the Planning Inspectorate has in recent years continually recognised the importance of connectivity. When applying the balancing exercise encouraged at paragraph 199 of the NPPF, the Inspectorate has found in multiple cases that the provision, or prevention of loss, to existing services can outweigh less than substantial harm to heritage assets.

In determining one such appeal, brought by operator Telefónica (O2) against the decision of the London Borough of Harrow to refuse Prior Approval for the installation of a 12.5 metre high monopole with shrouded antenna section and accompanied by an equipment cabinet on a roadside verge in the urban area of Harrow-on-the-Hill (appeal reference APP/M5450/W/17/3180345, determined in December 2017), the Inspector concluded that:

> "*The proposal would be permitted development and provide public benefits in extending the telecommunications capacity of the area. In applying the balancing test of paragraph 134 of the Framework, I consider that these **benefits outweigh the harm that would arise from the proposal's impact on the character and appearance of the Conservation Area***" (emphasis added).

These findings were echoed by the Inspectorate in determining a further case brought by the same Appellants against the decision of the London Borough of Hillingdon to refuse planning permission for a 15 metre high monopole with shrouded antenna section and associated equipment housing at a roadside location within the urban area of West Drayton (APP/R5510/W/16/3143922, 2016).

The Inspector concluded:

> "The Framework sets out the importance of an advanced high-quality communications infrastructure for sustainable growth and makes specific reference to the development of high-speed broadband technology. **This is reflected in the London Plan and the public benefit arising from the improvement of the telecommunications infrastructure is a material planning consideration that weighs in favour of the proposal**.
>
> Taking account of all matters I have concluded that the **limited harm caused to the significance of the heritage asset (the CA) would be outweighed by the public benefit that would arise from improving the communications infrastructure**" (emphasis added).

In both cases cited, the developments were new base station installations proposed within Conservation Areas and it was determined that they would give rise to a degree of harm to the heritage asset in question. Despite this, the importance of providing a quality communications infrastructure was recognised by the Inspectorate and awarded due weight in the determination of the cases brought. That weight was sufficient for both appeals to be successful, despite the recognised harm. In the case of this application, the same public benefit occurs, plus the deployment of apparatus with 5G capability, without the harm to any nearby designated areas.

Local Guidance:

Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted development plan for Gloucester City Council, relevant to the proposal, comprises:

- The Joint Core Strategy 2011 – 2031 for Gloucester, Cheltenham and Tewkesbury (Adopted December 2017).

Telecommunications:

The JCS does not contain a specific Telecommunications policy. The previous Telecommunications Policy – UI 8 – was not taken forward when the JCS was adopted in 2017. As such, greater weight should be given to the guidance outlined in the NPPF, as explored elsewhere within this document.

It has been demonstrated that the proposed scheme utilises good design. Whilst the apparatus may not be considered attractive, it is of 'high quality' design, and has clearly evolved over time. The roll-out of previous versions of telecommunications monopoles, which were far wider and had a shrouded, 'bubble' headframe were commonplace in the 1990s and 2000s. Technological

innovation now allows the antenna's to be 'stacked' within the monopole itself, allowing the larger 'bubble' headframe to be dispensed with. This should certainly be considered an evolution in design, with the 'design' now a higher quality than that which has been previously deployed and considered acceptable by Local Authorities.

As detailed at length within this application, the apparatus is dictated solely by function. The apparatus is required to provide network coverage to a specific target area. It has no other function and, as such, this must be acknowledged by the Council. An ICNIRP Certificate has been submitted as part of this application.

Without the deployment of a new base station, the entire area will be plunged into a 'coverage gap' resulting in this area effectively being transported back to a time pre-network roll-out (i.e. mid 2000s). Given the public reliance on these established networks, which has increased to unprecedented levels in the last 3 years, the need to deploy a new base station is clear, and certainly within the public interest.

The application site is considered the most appropriate available, within a very specific search area. The current coverage footprint provided by the installation at The Creative Centre is long-established. The proposed development has been specifically located to ensure that this coverage footprint is replicated, and improved upon. The innovative design of the monopole, which incorporates 'stacked' antennas, allows a linear structure to be deployed, rather than the traditional monopoles with a shrouded headframe. This design is considered wholly appropriate for urban areas with slimline monopoles now regularly rolled-out across the country, in all locations – be it urban, non-urban, industrial, or commercial. As outlined elsewhere in this document, the Planning Inspectorate has recently allowed a number of similar developments within various Local Authority areas where the economic, social and environmental public benefits of each schemes were not given sufficient weight when the assessment was made.

This location is considered to offer the best town planning, environmental and operational solution to replicating the existing coverage footprint from The Creative Centre at 1 Huclecote Road.

As the 5G network roll-out is in its relative infancy, and as more sites are deployed, 20-metre high installations will soon replace existing 15 metre sites across the country – thereby becoming 'the new normal'. This is supported by the Government's relaxation of Permitted Development rights which have again been relaxed in early 2022 (after being previously relaxed in 2017), which shows a clear indication that 20m is now the accepted height for new base stations, both within and outwith planning designations.

This relaxation of these Permitted Development rights has been specifically undertaken to allow the smooth roll-out of 5G network services. It should be noted that, as a consequence of this, the ground-based equipment cabinets are outright Permitted Development.

No conflict has been identified with any other Development Plan policies.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy, it minimises the number of installations by sharing and would provide coverage for a wide range of technologies. It is of significance that the development ensures a continued and enhanced provision of local community facilities and services through the integration of a replacement base station into the Operators network, and shows a wide-ranging, long-term strategy for the local area – something which is often requested by Local Authorities. Should this application not be supported, the need to deploy a replacement base station will still remain. In

that event, the applicants will therefore be directed towards locations which have already been assessed and considered to be less appropriate than the application site on Hucclecote Road. Failure to deploy a replacement base station, prior to the decommissioning of the existing installation, will result in a 'coverage gap' being created for two Network Operators, within the local area, for the first time in 17 years.

Conclusion

In summary, the application is in respect of electronic communications apparatus necessary to retain and improve existing public infrastructure networks, prior to the removal of the existing, nearby, installation. If no permanent solution can be integrated into the network then this area will find itself in a 'coverage gap' for the first time since network roll-out almost 17 years ago. The proposed development will ensure that this does not happen.

This statement has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact, being appropriately designed and located, as far as practicable.

The existing rooftop base station provides 2G, 3G and 4G coverage for two Operators. The proposed apparatus will improve the level of 3G and 4G coverage provided to the local area, as well as providing brand-new 5G connectivity for the first time (for both Operators). This proposed development will also provide the Emergency Services Network (ESN) coverage for the Ambulance, Fire and Rescue, and Police Services. This is an important planning consideration and must be acknowledged by the Local Authority.

In conclusion, the application merits support and there are no material considerations that indicate otherwise.

Contact Details

Name (Agent)	Nick Allan	Telephone	N/A
Operators	MBNL (EE (UK) Ltd and H3G UK Limited)	Fax No	N/A
Address	Dunmurry Office Park Anna House (A5 & A6) 37A Upper Dunmurry Lane Belfast BT17 0AA	Email address	N/A
Signed	[redacted]	Date	16th August 2022

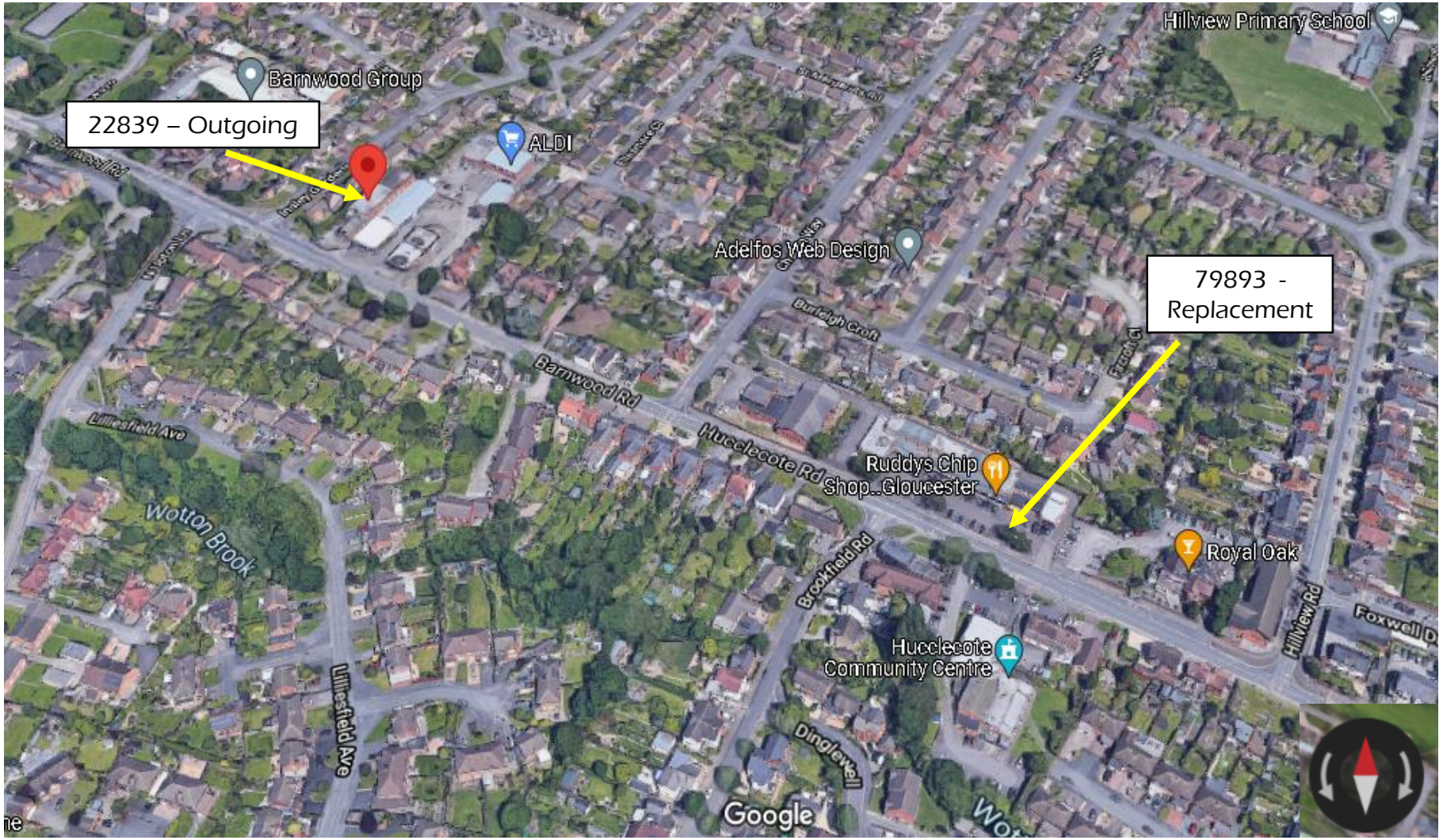
Position	Town Planner	Company	Dalcour Maclaren
For and on behalf of MBNL (EE (UK) Ltd and H3G (UK) Limited			

EE COVERAGE PLOTS –
FOR EXISTING SITE 22839_HUCCLECOTE ROAD RETAIL WHICH IS SUBJECT TO REDEVELOPMENT AND REPLACEMENT SITE 79893_HUCCLECOTE ROAD RETAIL

Background Information

- HUCCLECOTE ROAD RETAIL site (Ref: 79893) is located at Land at 57 Hucclecote Road , Gloucester, Goucestershire.
- Historically EE afforded coverage and network capacity in the immediate area from site on EARL & THOMPSON 212215, located approximately 350 m away.
- This site, EARL & THOMPSON 212215 (Ref 22839) will be lost from the network due to redevelopment.
- The site is mainly covering Hillview Primary School, Hucclecote Community Centre, Woodstock Nursing Home, Barnwood Park School, EDF Energy office, and nearby residential & Commercial places .
- HUCCLECOTE ROAD RETAIL site is required to form part of a network of sites operated by EE, which will provide overlapping coverage in order to seamlessly maintain continuous voice and data services, preventing dropped calls.

Satellite view showing proximity of Earl & Thompson 212215 site to Hucclecote Road Retail Site.



Street View of EARL & THOMPSON 212215 site

Street View of HUCCLECOTE ROAD RETAIL Site

SITE DESCRIPTION AND LOCATION INFORMATION

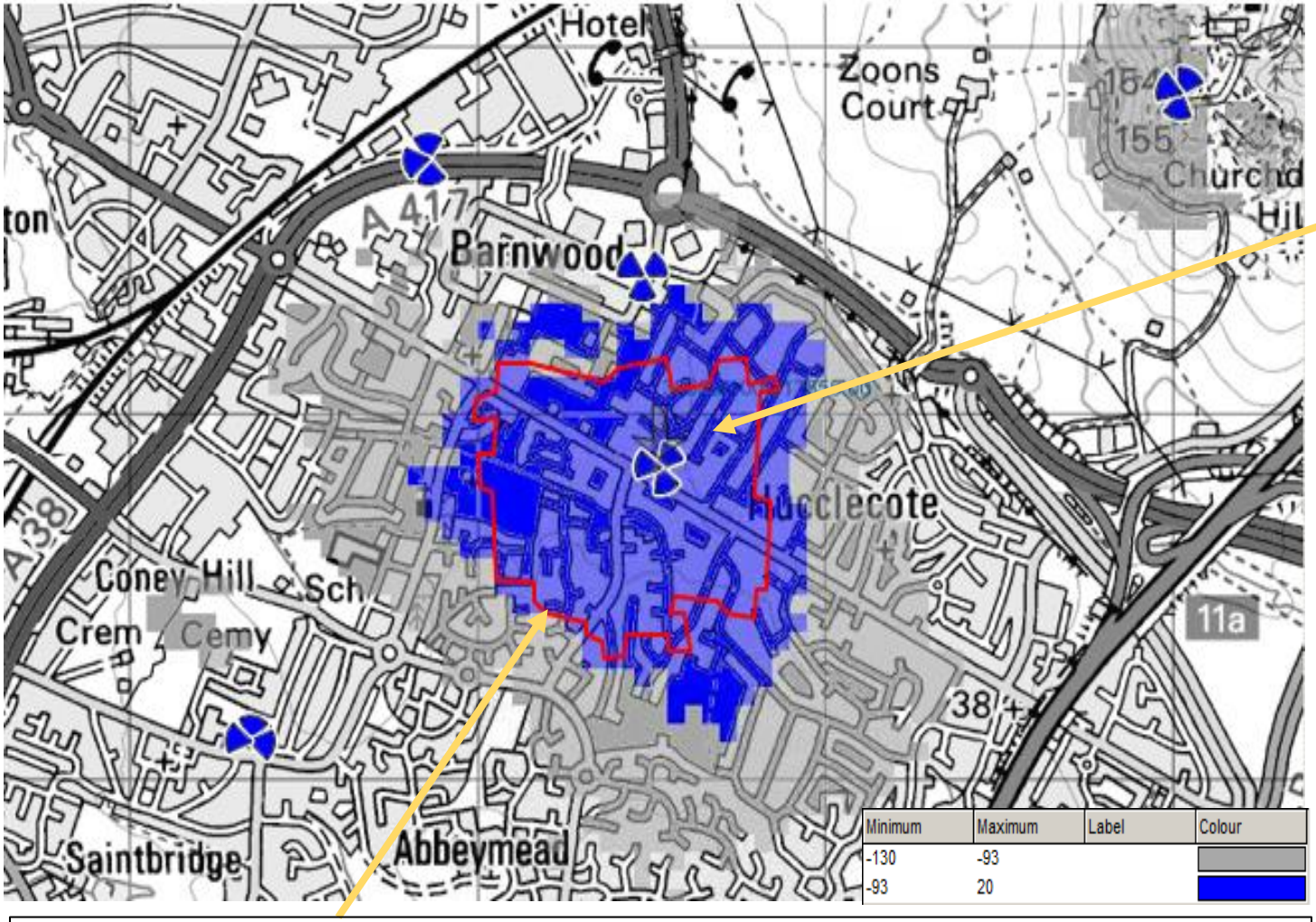
Site 79893, Hucclecote Road Retail , is a replacement site for the shared existing multi technology (2G/3G/4G) Earl & Thompson 212215 site.

The site is located at Land at 57 Hucclecote Road , Gloucester, Goucestershire.

The replacement site is required to allow EE to continue to deliver the best network voice and data service[1] to customers in the local area.
Additionally, this allows EE to continue to support a forecast of 2.6-fold growth on average mobile connection speed[2] by 2023 when compared to 2018, providing coverage and capacity solution in the area surrounding 22839.

[1] P3 Connect Mobile Benchmark 2017, [2]Cisco Annual Internet Report (2018–2023) White Paper

EE 2G INDOOR COVERAGE PLOT WITH EARL & THOMPSON 212215 , 22839 IN ISOLATION

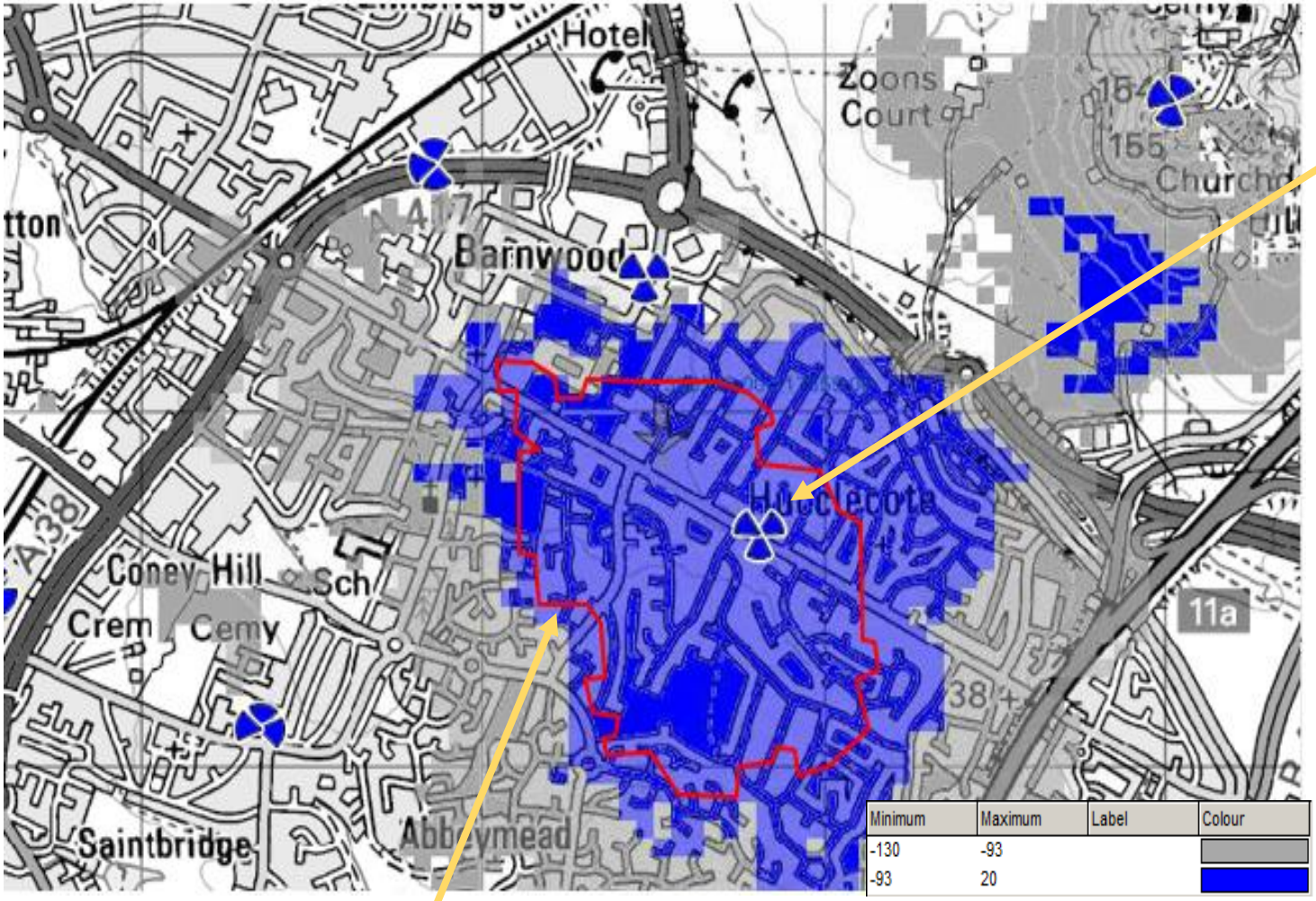


The blue area is the predicted existing full coverage area for 2G services from Earl & Thompson 212215 site.

The site overlap allows to maintain voice and data services enabling users to move seamlessly between the sites, preventing dropped call.

The red polygon details the extent of the primary coverage area for 2G services from the site.
This is the predicted area where customers are being served by 22839 from a coverage and capacity perspective.

EE 2G INDOOR COVERAGE PLOT WITH REP HUCCLECOTE ROAD RETAIL , 79893 IN ISOLATION

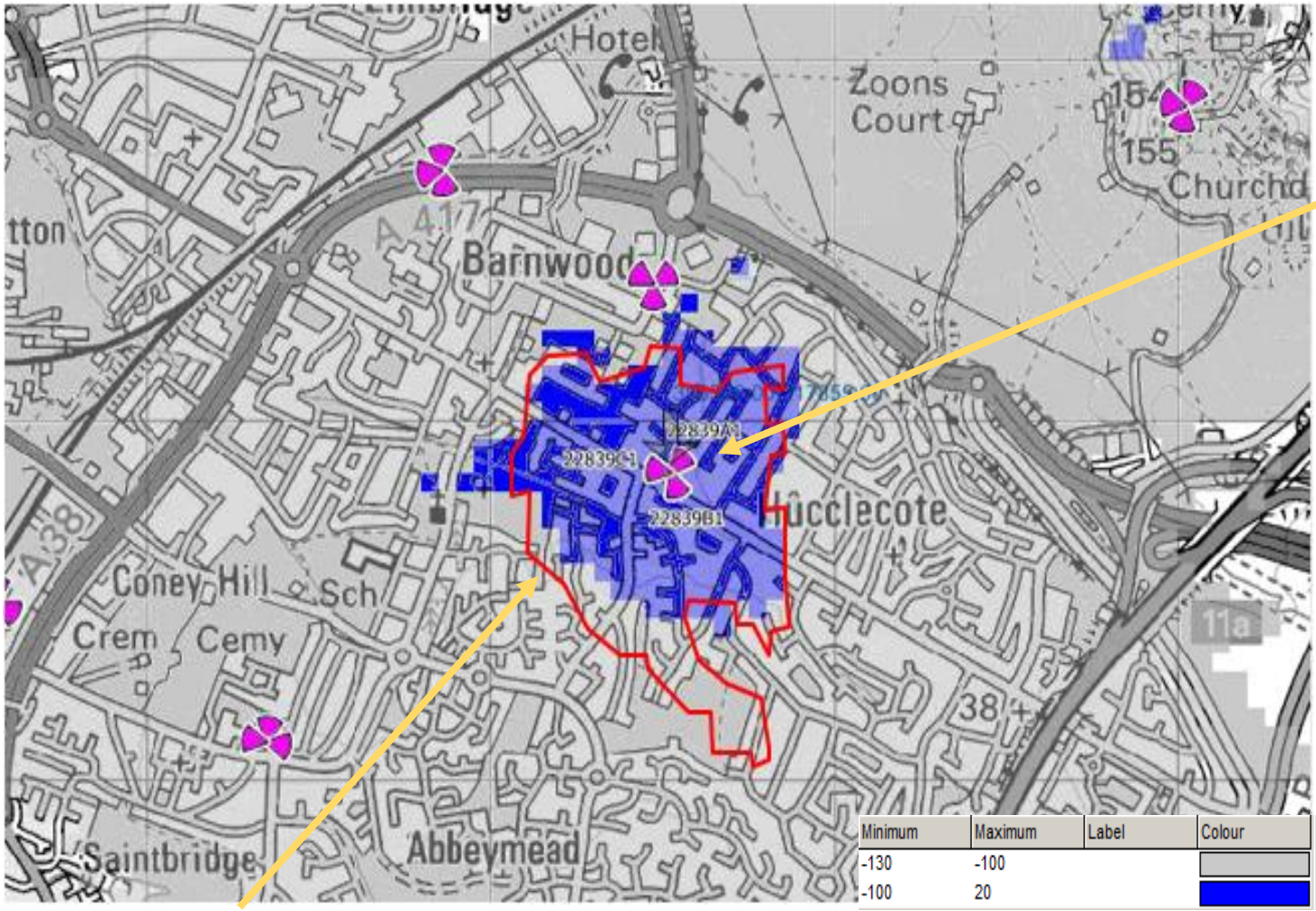


The blue area is the intended full coverage area for 2G services from Hucclecote Road Retail site.

The site overlap allows to maintain voice and data services enabling users to move seamlessly between the sites, preventing dropped calls

The red polygon depicts the extent of the primary coverage area for 2G voice services from the site.
This is the predicted area where customers will be served by 79893 from a coverage and capacity perspective.

EE 3G INDOOR COVERAGE PLOT WITH EARL & THOMPSON 212215 , 22839 IN ISOLATION



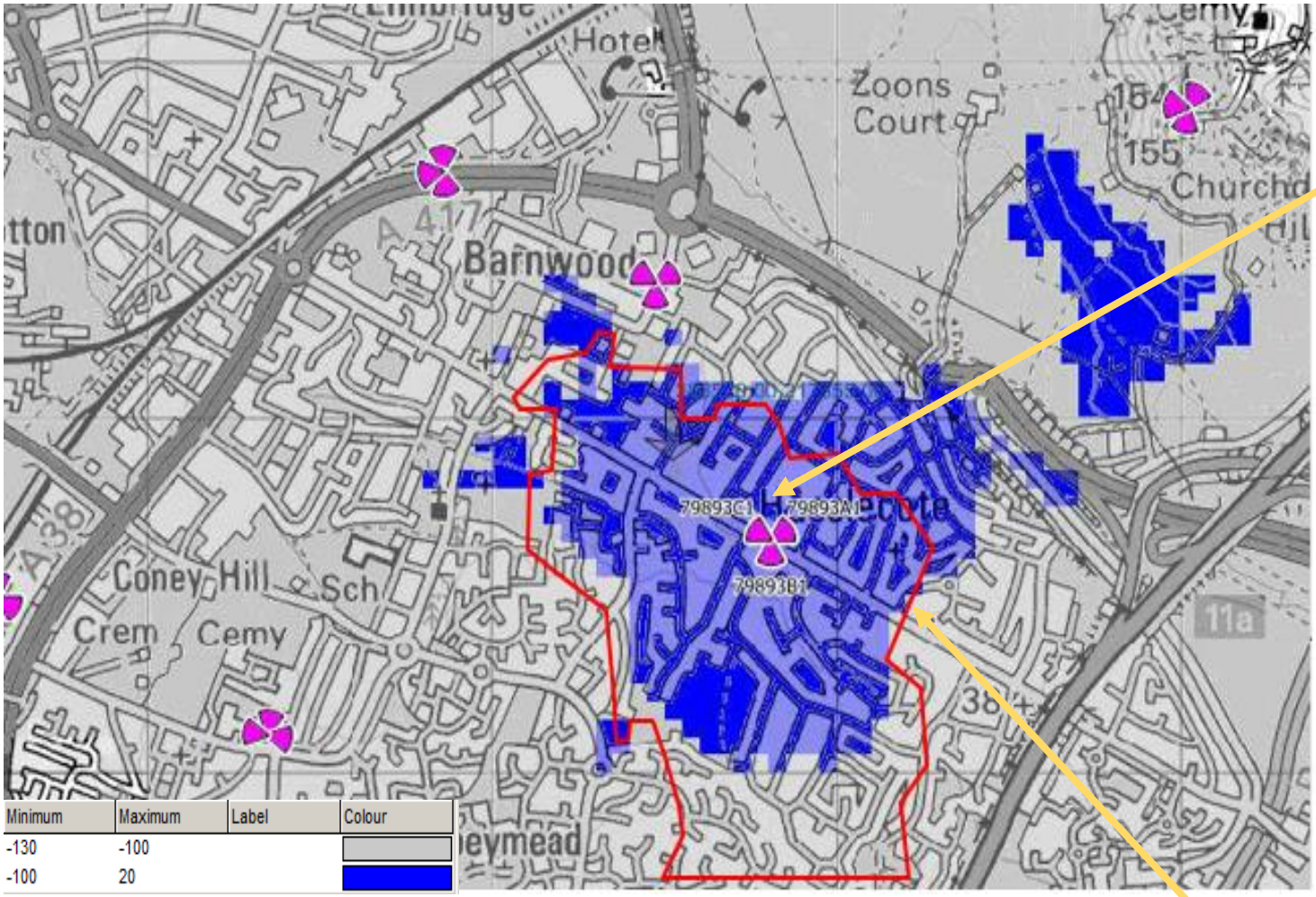
The blue area is the predicted existing full coverage area for 3G services from Earl & Thompson 212215 site.

The site overlap allows to manage traffic between this site and it's surrounding neighbours.

As traffic increases and decreases on a 3G cell the area it provides coverage to expands or retract (cell breathing). This coverage avoid gaps appearing during high traffic periods.

The red polygon is the intended extent of the primary coverage area for 3G Voice and Data services from the site.
This is the predicted area where customers are being served by 22839 from a coverage and capacity perspective.

EE 3G INDOOR COVERAGE PLOT WITH REP HUCCLECOTE ROAD RETAIL , 79893 IN ISOLATION



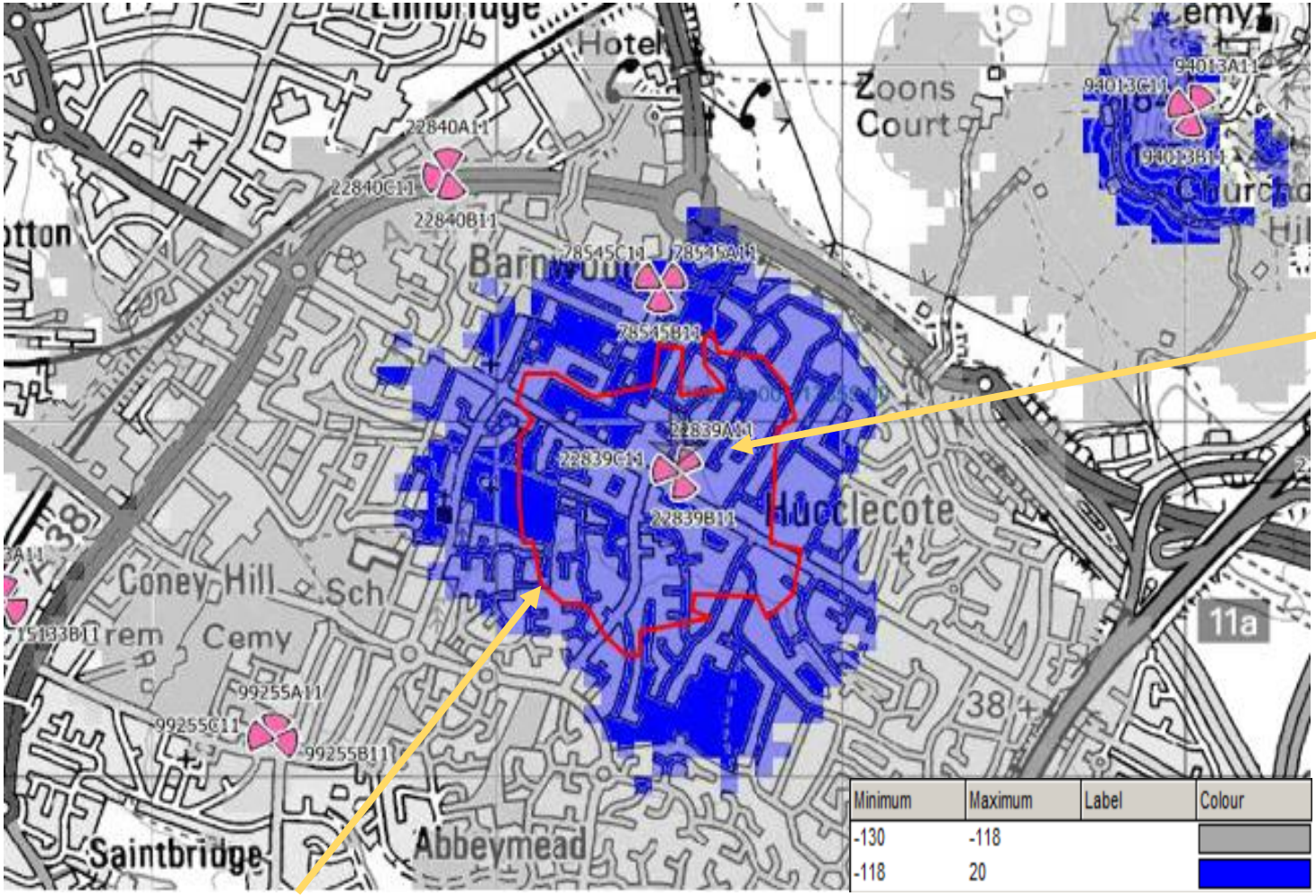
The blue area is the intended full coverage area for 3G services from Hucclecote Road Retail Site.

The site overlap allows to manage traffic between this site and it's surrounding neighbours.

As traffic increases and decreases on a 3G cell the area it provides coverage to expands or retract (cell breathing). This coverage avoid gaps appearing during high traffic periods.

The red polygon depicts the extent of the primary coverage area for 3G Voice and Data services from the site.
This is the predicted area where customers will be served by 79893 from a coverage and capacity perspective.

EE 4G INDOOR COVERAGE PLOT WITH EARL & THOMPSON 212215 , 22839 IN ISOLATION

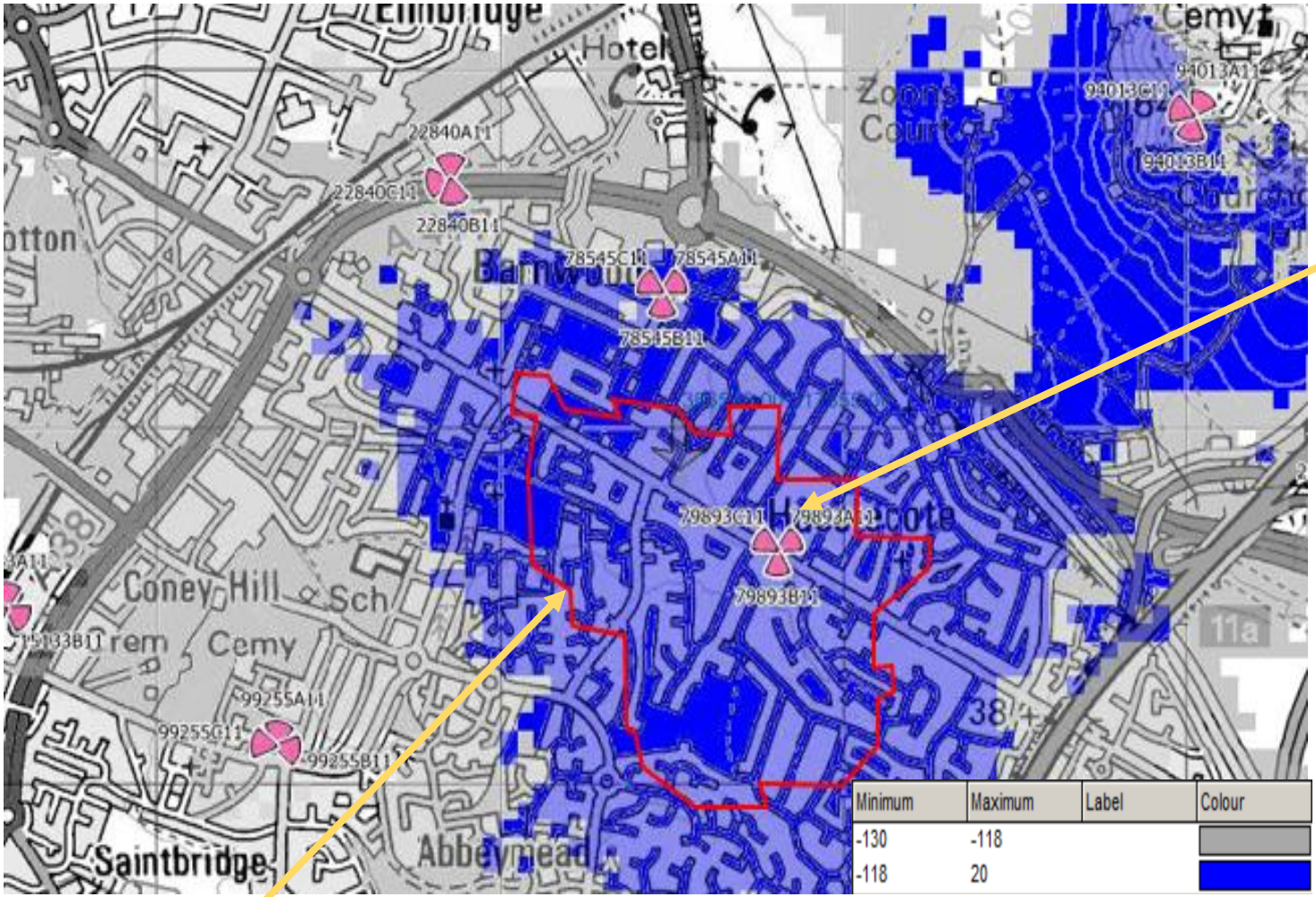


The blue area is the predicted existing full coverage area for 4G services from Earl & Thompson 212215 site.

The site overlap allows to manage traffic utilizing smart algorithms such as Mobility Load Balancing to deliver optimum performance to our customers in this area.

The red polygon is the intended extent of the primary coverage area for 4G Voice and Data calls from the site.
This is the predicted area where customers are being served by 22839 from a coverage and capacity perspective.

EE 4G INDOOR COVERAGE PLOT WITH REP HUCCLECOTE ROAD RETAIL, 79893 IN ISOLATION



The blue area is the intended full coverage area for 4G services from Hucclecote Road Retail site.

The site overlap allows to manage traffic utilizing smart algorithms such as Mobility Load balancing to deliver optimum performance to our customers in this area.

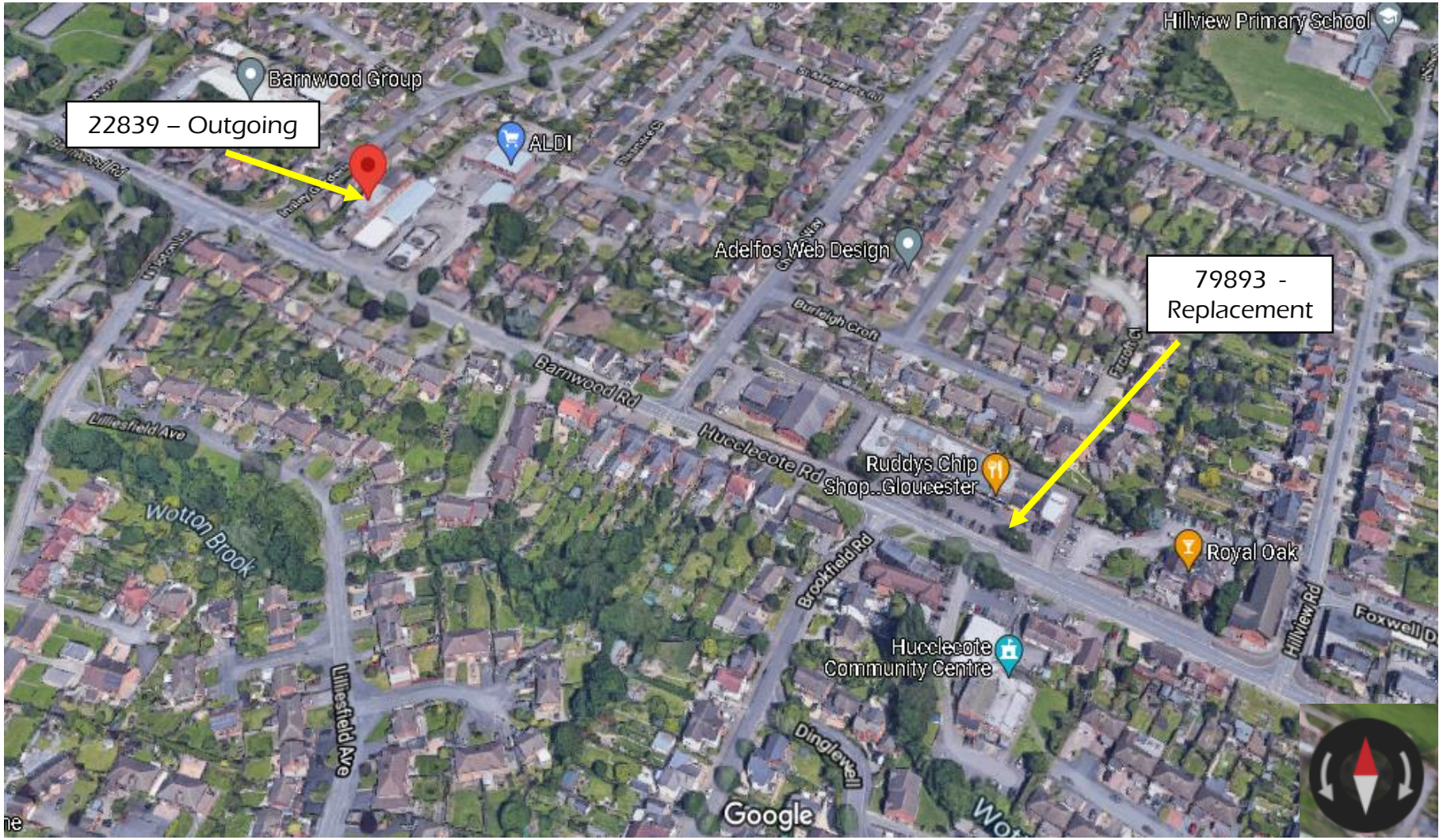
The red polygon is the extent of the primary coverage area for 4G Voice and Data calls from the site.
This is the predicted area where customers will be served by 79893 from a coverage and capacity perspective

THREE COVERAGE PLOTS –
FOR EXISTING SITE 22839_EARL & THOMPSON 212215 WHICH IS SUBJECT TO REDEVELOPMENT AND REPLACEMENT SITE 79893_HUCCLECOTE ROAD RETAIL

Background Information

- HUCCLECOTE ROAD RETAIL site (Ref: 79893) is located at Land at 57 Hucclecote Road , Gloucester, Goucestershire.
- Historically THREE afforded coverage and network capacity in the immediate area from site on EARL & THOMPSON 212215, located approximately 350 m away.
- This site, EARL & THOMPSON 212215 (Ref 22839) will be lost from the network due to redevelopment.
- The site is mainly covering Hillview Primary School, Hucclecote Community Centre, Woodstock Nursing Home, Barnwood Park School, EDF Energy office, and nearby residential & Commercial places .
- HUCCLECOTE ROAD RETAIL site is required to form part of a network of sites operated by THREE, which will provide overlapping coverage in order to seamlessly maintain continuous voice and data services, preventing dropped calls.

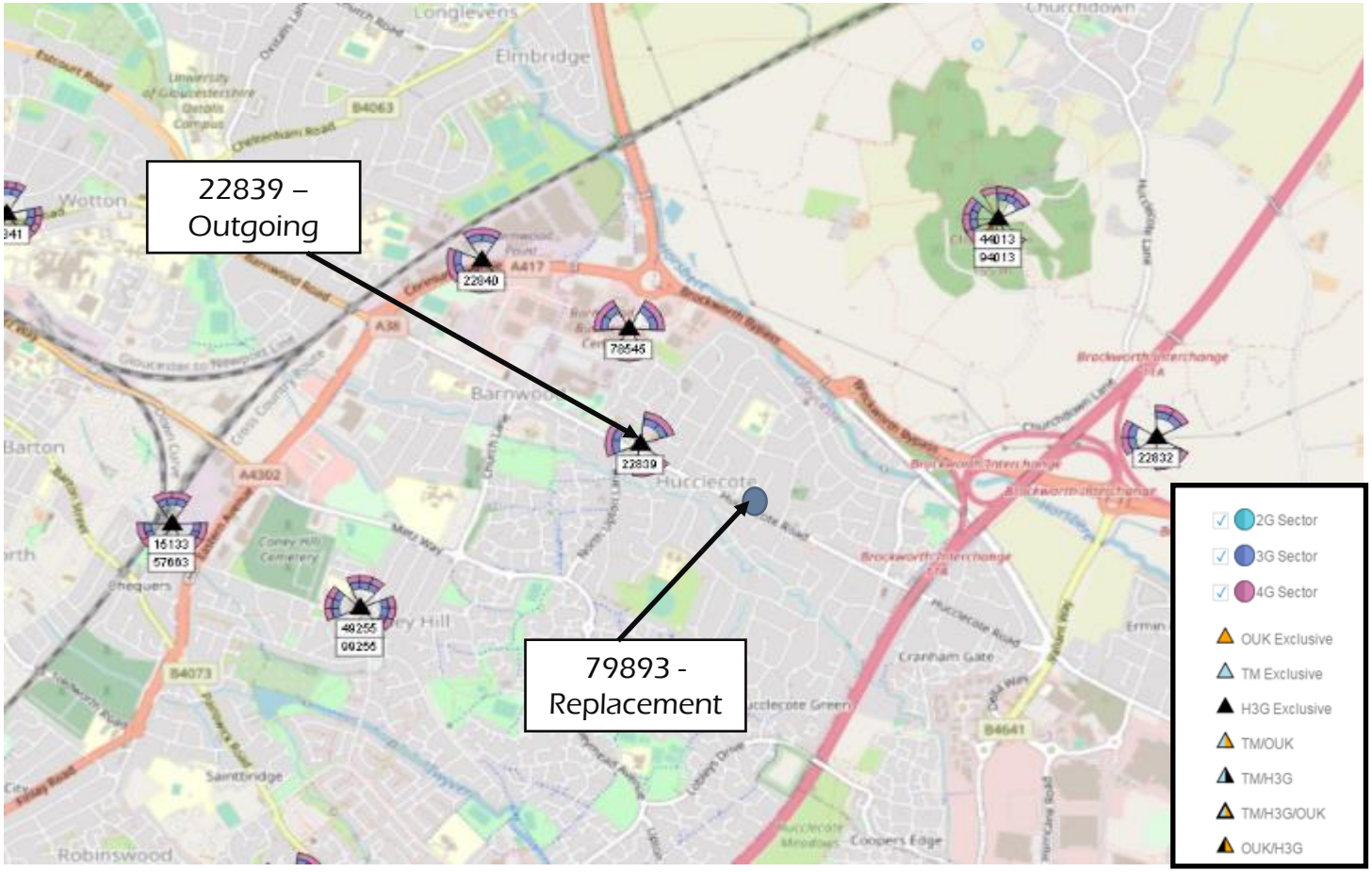
Satellite view showing proximity of Earl & Thompson 212215 site to Hucclecote Road Retail Site.



Street View of EARL & THOMPSON 212215 site

Street View of HUCCLECOTE ROAD RETAIL Site

SITE DESCRIPTION AND LOCATION INFORMATION



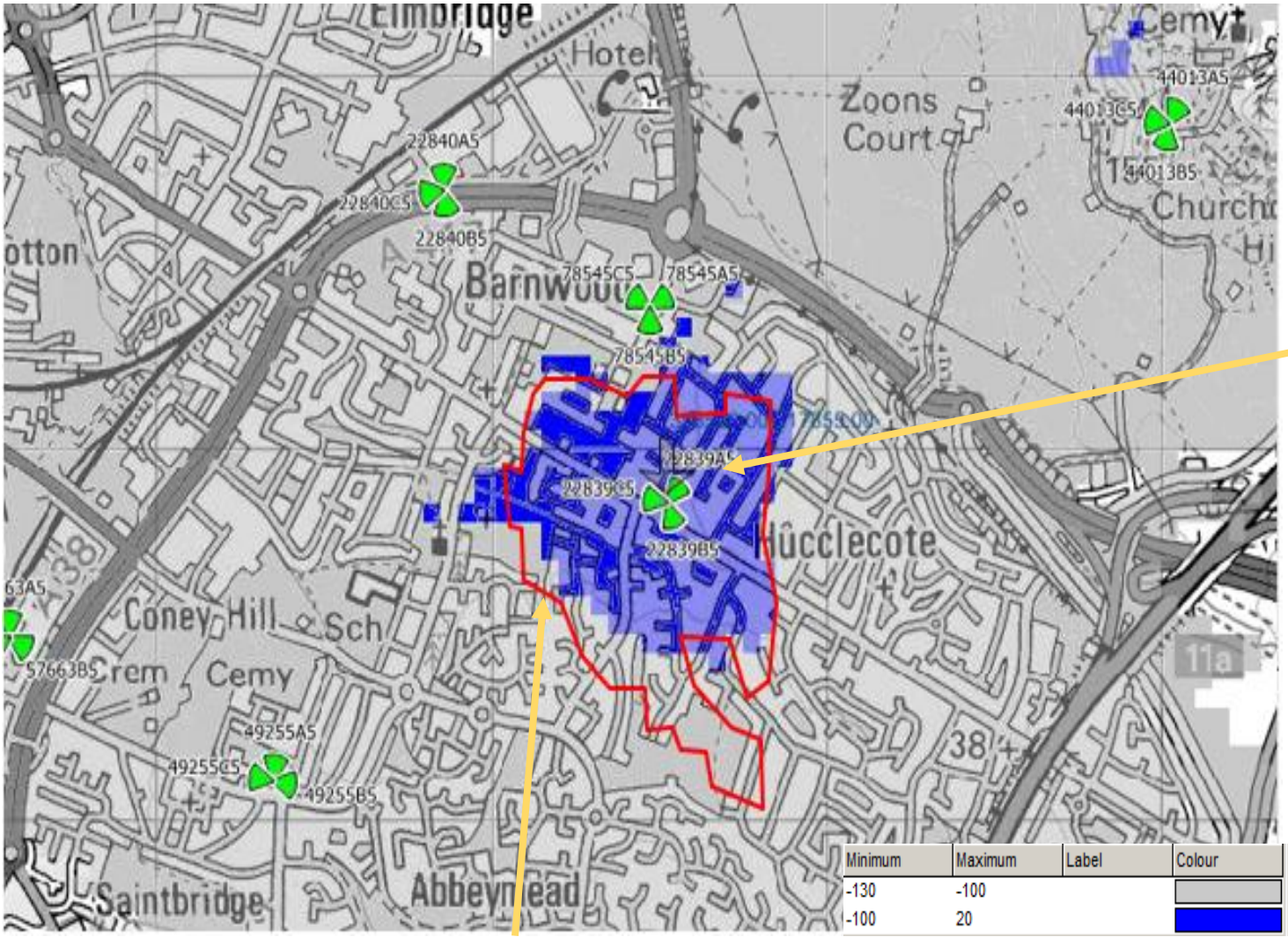
Site 79893, Hucclecote Road Retail , is a replacement site for the shared existing multi technology (3G/4G) Earl & Thompson 212215 site.

The site is located at Land at 57 Hucclecote Road , Gloucester, Goucestershire.

The replacement site is required to allow Three to continue to deliver good network voice and data service[1] to customers in the local area.
Additionally, this allows Three to continue to support a forecast of 2.6-fold growth on average mobile connection speed[2] by 2023 when compared to 2018, providing coverage and capacity solution in the area surrounding 22839. In recent years, Three carried over 40% of all mobile data traffic.

 [1] P3 Connect Mobile Benchmark 2017, [2]Cisco Annual Internet Report (2018–2023) White Paper

THREE 3G INDOOR COVERAGE PLOT WITH EARL & THOMPSON 212215 , 22839 IN ISOLATION



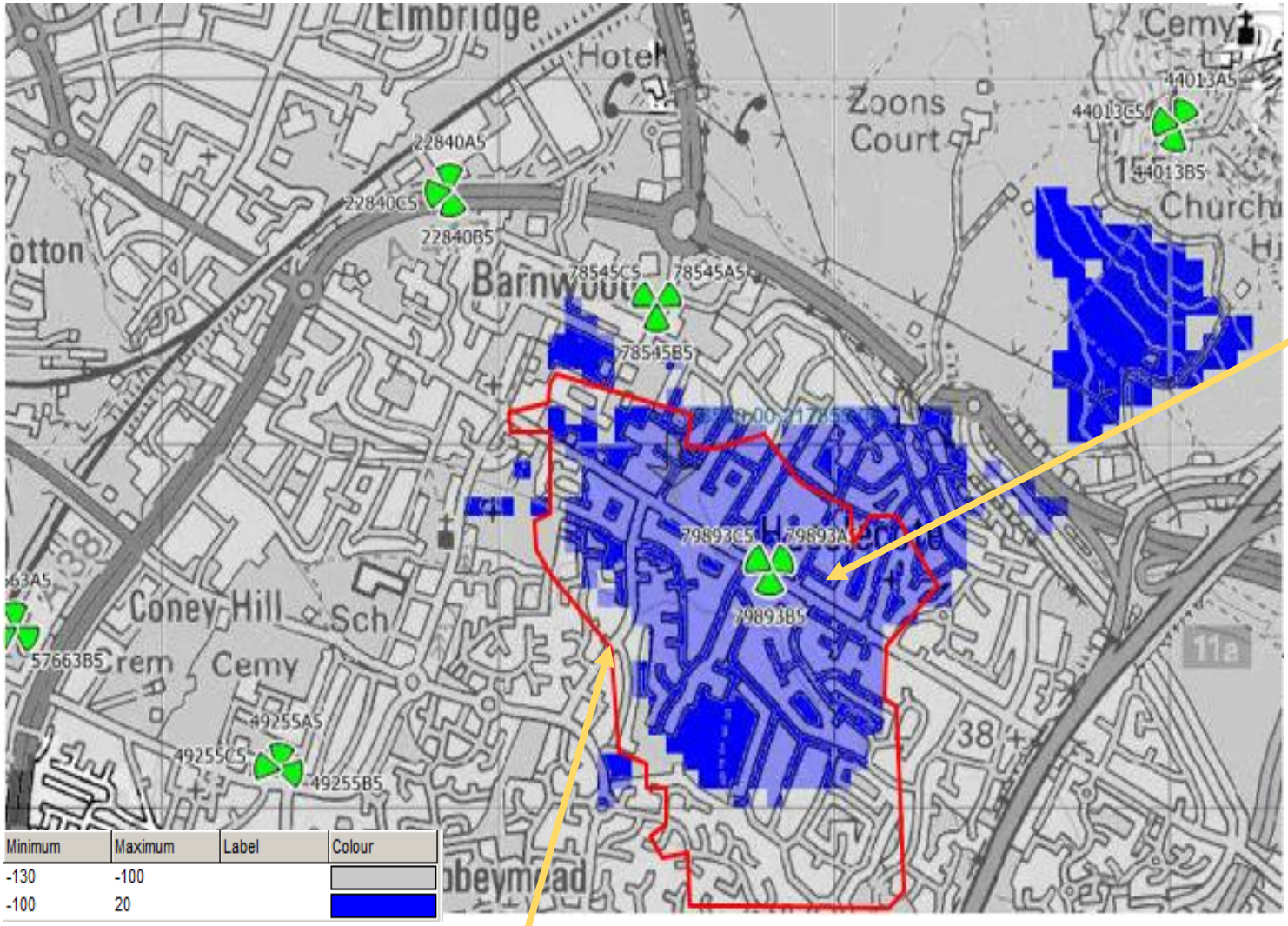
The blue area is the predicted existing full coverage area for 3G services from Earl & Thompson 212215 site.

The site overlap allow us to manage traffic between this site and it's surrounding neighbours.

As traffic increases and decreases on a 3G cell the area it provides coverage to expands or retract (cell breathing). This coverage avoid gaps appearing during high traffic periods.

The red polygon is the intended extent of the primary coverage area for 3G voice and data services from the site.
This is the predicted area where customers are being served by 22839 from a coverage and capacity perspective.

THREE 3G INDOOR COVERAGE PLOT WITH REP HUCCLECOTE ROAD RETAIL, 79893 IN ISOLATION



The blue area details the intended full coverage area for 3G services from Hucclecote Road Retail site.

The site overlap allow us to manage traffic between this site and it's surrounding neighbours.

As traffic increases and decreases on a 3G cell the area it provides coverage to expands or retract (cell breathing). This coverage avoid gaps appearing during high traffic periods.
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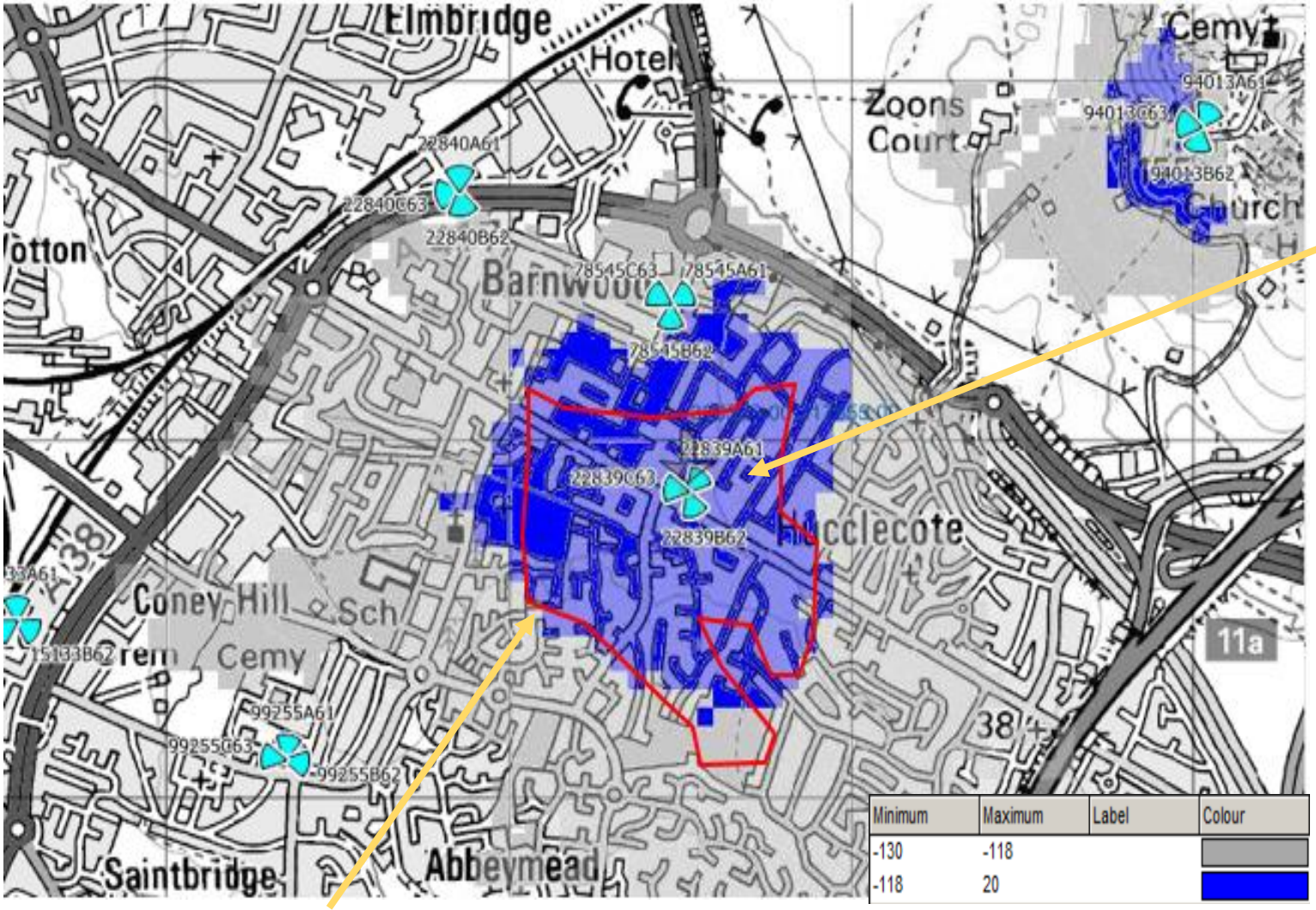
The red polygon depicts the extent of the primary coverage area for 3G voice and data services from the site.
This is the predicted area where customers will be served by 79893 from a coverage and capacity perspective.

THREE 4G INDOOR COVERAGE PLOT WITH EARL & THOMPSON 212215 , 22839 IN ISOLATION

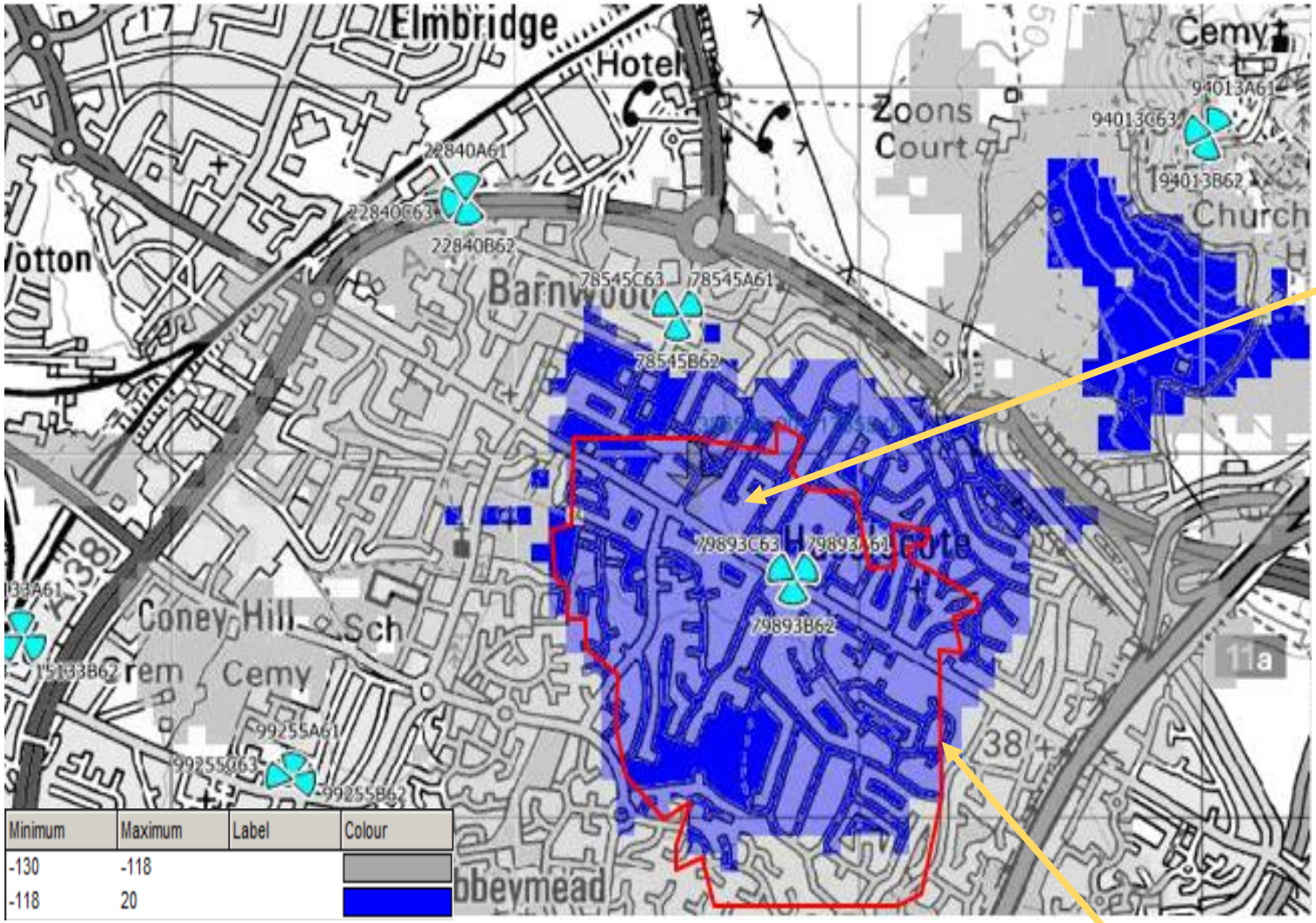


The blue area is the predicted existing full coverage area for 4G services Earl & Thompson 212215 site.

The site overlap allows to manage traffic utilizing smart algorithms such as Mobility Load Balancing to deliver optimum performance to our customers in this area.

The red polygon is the intended extent of the primary coverage area for 4G Voice and Data calls from the site.
This is the predicted area where customers are being served by 22839 from a coverage and capacity perspective.

THREE 4G INDOOR COVERAGE PLOT WITH REP HUCCLECOTE ROAD RETAIL, 79893 IN ISOLATION



The blue area is the intended full coverage area for 4G Hucclecote Road Retail site.

The site overlap allows to manage traffic utilizing smart algorithms such as Mobility Load Balancing to deliver optimum performance to our customers in this area.

The red polygon is the extent of the primary coverage area for 4G voice and data calls from the site.
This is the predicted area where customers will be served by 79893 from a coverage and capacity perspective.

DALCOUR MACLAREN

DEVELOPER'S NOTICE AS REQUIRED UNDER THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2022 (AS AMENDED)

Proposed Development at: Land at 57 Hucclecote Road, Gloucester, Gloucestershire, GL3 3TL.

National Grid Reference: E386810, N217658 Ref no; 1649345

I give notice that Dalcour Maclaren of Dunmurry Office Park, Anna House (A5 & A6), 37A Upper Dunmurry Lane, Belfast, BT17 0AA, on behalf of MBNL (EE (UK) Ltd and H3G (UK) Ltd), are making an application to Gloucester City Council, Development Control, Shire Hall, Westgate Street, Gloucester, GL1 2TG to determine whether the prior approval of the authority will be required as to the siting and appearance of:

The installation of a new 20m-high slimline telecommunications monopole (with a wraparound cabinet) supporting 12no. 'stacked' antenna apertures and 2no. transmission dishes; plus and 6no. ground-based equipment cabinets; and ancillary development thereto

The application and accompanying plans may be available for public inspection at the offices of the above Authority at Gloucester City Council, Development Control, Shire Hall, Westgate Street, Gloucester, GL1 2TG, during usual office hours.

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 address above (please quote site address given above). Any representations must be received by the Local Planning Authority no later than 9th September 2022.

Name: Nick Allan (Dalcour Maclaren)

Signed: [redacted]

For MBNL (EE (UK) Ltd and H3G (UK) Ltd)

Date: 12/8/2022

Our Ref: 1649345/NA
Planning Portal Ref: PP-11471633

16th August 2022

Gloucester City Council
Development Control
Shire Hall
Westgate Street
Gloucester
GL1 2TG

Dunmurry Office Park
Anna House (A5 & A6)
37A Upper Dunmurry Lane
Belfast
BT17 0AA

[redacted]

Dear Sir, Madam,

PRIOR APPROVAL NOTIFICATION
PROPOSED INSTALLATION OF AN ELECTRONIC COMMUNICATIONS BASE STATION

This application is submitted under Part 16 of Schedule 2 to the Town and Country Planning (General permitted Development) (England) Order 2022 (as amended) and notice in accordance with the electronic communications code under the Telecommunications Act 1984 Schedule 2 as amended by the Communications Act 2003.

This is an application for a determination as to whether the prior approval of the Authority will be required as to the siting and appearance of the development detailed below;

In accordance with paragraph A.3(5) of Part 16, the Application comprises:

- **Written description of the development**
  "*The installation of a new 20m-high slimline telecommunications monopole (with a wraparound cabinet) supporting 12no. 'stacked' antenna apertures and 2no. transmission dishes; plus and 6no. ground-based equipment cabinets; and ancillary development thereto*"
  at Land at 57 Hucclecote Road, Gloucester, Gloucestershire, GL3 3TL.
  NGR: E386810, N217658.

- **A plan indicating its location**
  Site location map attached referenced '002 Site Location Plan, Rev A'

- **Fee**
  Payment of £462 has been made

- **The developer's contact address details:**
  EE Limited: Hatfield Business Park, Hatfield, Hertfordshire, AL10 9BW
  E-mail: Site.Information@everythingeverywhere.com

  Three (H3G) UK Limited: 450 Longwater Avenue, Green park, Reading, Berkshire, RG2 6GF
  Email: DLCTO3rdLineTechnicalSupport@three.co.uk

The above is supplied to satisfy the requirements of the GPDO, however, all correspondence relating to this application should be directed to the agent acting on behalf of H3G in this matter, Dalcour Maclaren.

- **Evidence that notice of the application has been issued to the landowner**
  Copy of Developers Notice and proof of issue and receipt attached.

- **Confirmation as to whether there is requirement to notify the CAA, Secretary of State for Defence or aerodrome operator and if this has been met**
  It is confirmed that there is no requirement to notify the above named bodies in this instance as the proposal does not constitute the installation, alteration or replacement of a mast within 3km of the perimeter of an aerodrome.

In accordance with paragraph A.3 (8) pf Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2022 (as amended) the local authority has 56 days to determine the application on receipt of the above information.

For the further assistance of the local authority, the additional non-statutory information is also attached:

- 1 App Form;
- Location plan drawn to a scale of 1:1250, with the site outlined in red, drawing referenced '002 Site Location Plan, Rev A';
- Drawings referenced; 100 (Existing Site Plan); 150 (Existing Elevation Plan); 215 (Proposed Maximum Configuration Site Plan); 265 (Proposed Maximum Configuration Elevation Plan);
- Supplementary Information document;
- Mobile UK – Councils and Connectivity;
- Mobile UK – Health Fact Sheet;
- UK Government – Ofcom 5G EMF Guide; &
- ICNIRP Compliance document.

We look forward to receiving your acknowledgment and decision in due course.

Yours sincerely

Nick Allan
Dalcour Maclaren
On behalf of MBNL (EE (UK) Ltd and H3G (UK) Ltd)

[redacted]

ICNIRP CERTIFICATE

DECLARATION OF CONFORMITY WITH ICNIRP PUBLIC EXPOSURE GUIDELINES

EE (UK) Ltd
Hatfield Business Park
Hatfield
AL10 9BW

H3G (UK) Ltd
Hutchison House
5 Hester Road
London
SW11 4AN

Certifies that the equipment and installation at:

Hucclecote Road Retail, Land at 57 Hucclecote Road, Hucclecote Road, Gloucester, Gloucestershire, GL3 3TL

As shown on plan ref: 79893_002

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

This certification takes into account other cellular mobile phone operators on the site.

Name:

Signed: … [redacted] ……

Title/Position: Design Manager

Company:
(Appointed Representative of EE Ltd)

Date: …11th May *2022*…….

EE (UK) Ltd
Registered Office: Hatfield Business Park, Hatfield, AL10 9BW

H3G (UK) Ltd
Registered Office: Hutchison House, 5 Hester Road, London, SW11 4AN

5G Masts & Health

5G is a generation leap in mobile technology with multiple benefits. However, with new technology, it is understandable that people wish to seek reassurance as to its safety and how it works.

This guide provides an explanation of 5G and the equipment behind it, including the antennae and the masts, to ensure that there is no cause for concern in regard to health.

5G & Radio Waves

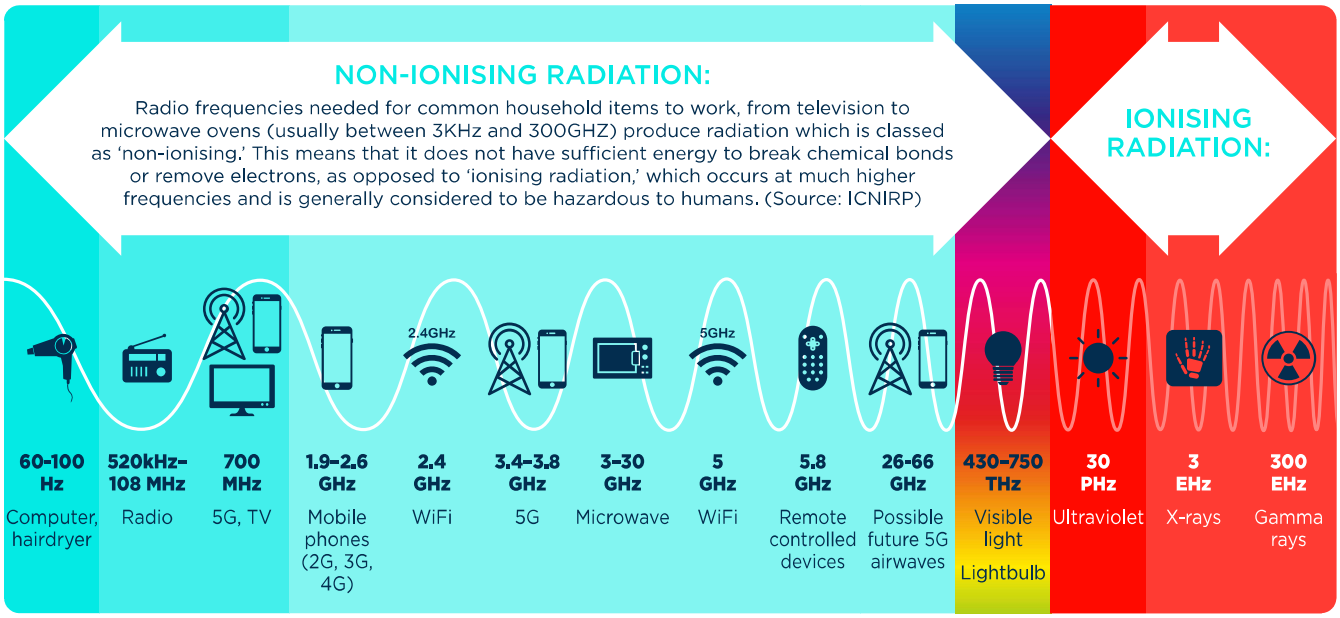
5G is broadcast using radio waves, which are a type of radiation in what is commonly referred to as the 'electromagnetic spectrum.' Sometimes the word 'radiation' scares people, because it is an invisible thing and something many people do not understand, or easily confuse with 'radioactivity.'

Radiation is simply the release of energy, just like the light from the sun or heat from our bodies. Most radiation is considered harmless, or in scientific terms, non-ionising when used within guidelines. It is part of our everyday lives, without us even realising it. Radio waves are used by your TV, radio and remote control.

5G uses a specific frequency of radio waves, just like 4G and before that 3G. The exposure to these radio waves is very low and crucially, many times lower than public safety guidelines dictate.

All frequencies that are currently and will in future be used for 5G fall within the part of the electromagnetic spectrum that includes radiation which is classed as non-ionising. This means that these radio waves do not carry enough energy to directly damage cells. This is different from 'ionising' radiation, which is generally considered to be hazardous to humans and includes gamma (nuclear) radiation as well as x-rays, which occur at the higher frequency end of the electromagnetic spectrum.

- Ofcom



5G Masts & Health

Research into the safety of 5G and mobile phone signals

Research into the safety of radio waves has been conducted for more than 80 years, across the UK and around the world. The strong consensus of scientific opinion and public health agencies, such as the World Health Organisation (WHO), is that no dangers to health have been established from exposure to the low-level radio signals used for mobile communications, including 5G, when used within guidelines.

Strict safety guidelines

All mobile operators must ensure that their radio base stations (also known as masts) are designed and built so that the public are not exposed to radiofrequency fields above the strict safety guidelines which govern and limit public exposure to electromagnetic fields. In fact, base stations operate at low levels, emitting levels of radio waves many times lower than the guidelines.

The International Commission on Non-Ionising Radiation Protection (ICNIRP) is the universally recognised non-governmental organisation that governs the safety levels of electromagnetic field or radio wave exposure and is accepted by the World Health Organisation (WHO). The guidelines, updated in 2020, monitor frequencies up to 300GHz, anything below this threshold is considered to not cause adverse health effects and is therefore safe for the public. 5G radio waves fall well within this category, operating at 700MHz and between 3.4GHz 3.6GHz.

Testing of 5G masts

In fact, the UK's telecoms regulator Ofcom carried out tests at 5G-enabled mobile masts across the country. The highest emission levels (e.g. radiation) recorded at mobile phone masts were consistently well within the strict safety guidelines that monitor radiation levels.

Further Information

As the world depends more and more on mobile connectivity and we are consuming more data, existing networks are becoming congested. 5G has the capacity to handle this and future demand, as it will offer much faster data and upload speeds, allow more devices to access the mobile internet at the same time, and significantly reduce the amount of time it takes to send information from one point to another.

The rollout of 5G is not just about the benefits to each individual mobile phone user but the wider societal benefits of providing connectivity to all, such as the emergency services, local businesses and the provision of council services; the capability of 5G can transform, and ultimately help save lives.

For more information on 5G and health, and to learn about the wider benefits of 5G visit **www.mobileuk.org.uk/5G-and-health**

For further information from external sources regarding 5G and health, the following links may be helpful:

World Health Organization (WHO) - Radiation: 5G mobile networks and health: **https://www.who.int/news-room/q-a-detail/radiation-5g-mobile-networks-and-health**

BBC - Does 5G post health risks?: **https://www.bbc.co.uk/news/world-europe-48616174**

Which? - Is 5G safe?: **https://www.which.co.uk/news/2020/06/is-5g-safe-everything-you-need-to-know-on-the-5g-powered-future/**

BBC Click - Testing the Safety of 5G: **https://www.youtube.com/watch?v=k2t1dUCyE0I&feature=youtu.be**

Cancer Research UK - Do mobile phones cause cancer?: **https://www.cancerresearchuk.org/about-cancer/causes-of-cancer/cancer-myths/do-mobile-phones-cause-cancer**

Councils & Connectivity

How local government can help to build mobile Britain

September 2018

BUILDING MOBILE BRITAIN

Mobile UK

BUILDING
MOBILE
BRITAIN

Mobile UK 21C | Registered Office: 1 Carnegie Road, Newbury, Berkshire RG14 5DJ
Registered in England & Wales No. 09998063

92%

of UK premises have mobile services from all four operators.

(Ofcom)

According to the *Future Connectivity Challenge Group*, the UK's leadership in **5G** could result in the opportunity to create

£173 billion

of incremental UK GDP growth over a ten-year period from **2020** to **2030**.

Mobile data use predicted to rise to

90gb per month by **2025**.

(Three UK customer prediction based on Ofcom Mobile Data Strategy, 2016)

Average monthly user data consumption

1.9gb in **2017**.

(Ofcom)

£2 billion

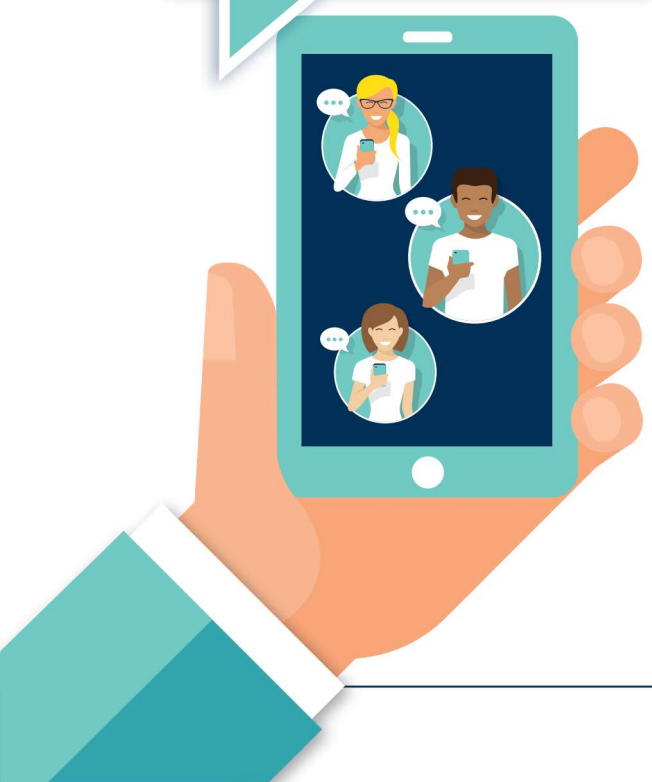
mobile operators **annual investment** in new network infrastructure.

(Mobile UK)

92 million

active mobile subscribers.

(Ofcom, Communications Market Report, 2018)



18%

the proportion of adults who live in a **mobile-only** home.

(Ofcom, Fast Facts, 2017)

Contents

About Building Mobile Britain

Building Mobile Britain is a campaign that supports the mobile industry's collaboration with national and local government, regulators, industry, consumers and citizens to overcome the challenges to expanding mobile networks, whilst also developing innovative services for customers.

Building Mobile Britain is run by Mobile UK, the trade association for the UK's mobile network operators – EE, O2, Three and Vodafone. The mobile network operators are determined to continually improve and to expand the UK's mobile capacity.

For further information about Building Mobile Britain visit: **http://www.buildingmobilebritain.org.uk**

For further information on the work of Mobile UK visit: **http://www.mobileuk.org/**

About this publication

This document outlines the mobile industry's view on how local government can create an environment that is conducive to the building of mobile infrastructure. It has been written so as to be relevant to all tiers of local government – and to any body interested in local economic development. The analysis and recommendations included in the following chapters have been developed from desk research and conversations with representatives of the mobile industry and local government. Thanks go to those who took the time to help inform the content of this publication. This report was produced by Policy Points, a research organisation specialising in evidence based policy making.

The need for mobile industry and local government collaboration

The UK's mobile connectivity is getting better and better. Indoor call coverage from all four mobile networks is now available in **92%** of UK premises; data coverage from all operators is now available in **88%** of UK premises.[i] This has been achieved by the mobile industry investing billions of pounds every year into network capacity, coverage and capability.

The investment in mobile infrastructure will continue and it will evolve. Just as the use of 4G mobile technology becomes widespread, the adoption and use of 5G mobile technology needs to be planned and implemented. Getting this right is important for three reasons:

1. **Mobile connectivity is essential to the future success of the economy.** The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026.[ii]
2. **Mobile connectivity is essential to creating a better society.** Digital inclusion can help people gain employment, become more financially secure and improve health and well-being.[iii]
3. **Mobile connectivity is essential to fulfilling the potential of new technologies.** Innovations such as Artificial Intelligence and connected cars will change how we work, spend our leisure time and run our public services.[iv]

The mobile industry has been able to enhance mobile connectivity across most of the country. But there is more to be done:

- There is demand for mobile connectivity in areas where geography, logistics or economics – or a combination of all three – make it difficult.
- Mobile network capacity needs to grow to meet the demand of mobile users, who are consuming ever increasing amounts of data.

Local government has a key role in addressing these issues because the mobile industry cannot address them alone. Therefore, this report makes recommendations and offers guidance for how mobile network operators and local government can collaborate to create an environment that encourages the build of mobile infrastructure. The recommendations and guidance are presented under three themes:

- **Adopting a proactive approach** – Leadership and political will can provide impetus that improves the mobile connectivity outcomes for residents.
- **Planning for the long-term** – Because of its importance to economic outcomes, mobile connectivity needs embedding into every aspect of local government's strategic thinking.
- **Build partnerships and share best practice** – The full potential of mobile connectivity cannot be realised unless there is collaboration and exchange of ideas.

The recommendations and guidance under these themes have been designed so that they can be applied despite significant financial pressures faced by local government, e.g. Local Authority spending on planning and development services fell by more than 50% in real terms between 2011-12 and 2016-17.[v]

It is important to note that alongside the recommendations made in this report other improvements are required to streamline network rollout – such as reduced regulatory burdens, a consistent planning regime, and a supportive tax system. As such, while the recommendations discussed in this document will provide opportunities to improve the environment mobile operators and local government work within, they are not guarantees to enhance connectivity and coverage.

1 ADOPT A PROACTIVE APPROACH

Local government can create the right environment to improve mobile connectivity by:

1. **Showing leadership and political will.** Local government should see mobile connectivity as a way to improve the lives of residents and not just as a way to raise revenue. There are numerous examples of how different local organisations – combined authorities, local authorities and local enterprise partnerships (LEPs) – have promoted the economic and social benefits that flow from good mobile connectivity.
2. **Creating local government 'digital champions'.** This could be a Local Authority cabinet post or committee focussed on mobile connectivity, a senior role dedicated to making better use of mobile/digital technology (such as a Chief Digital Officer) or a council officer with responsibility to improve mobile connectivity. Equally, when local government is a proactive user of mobile technology it is more likely to be a proactive enabler of mobile technology.
3. **Providing training to ensure appropriate skills and knowledge.** A key example of this is ensuring planning officers are aware of the requirements of mobile infrastructure. In the past, mobile operators have played their part by providing local planning authorities with professional development workshops on technological and other advances within telecommunications.
4. **Lobbying to remove the barriers to mobile infrastructure deployment.** Local government can use its influence to improve the environment for investment in mobile infrastructure. For example, if a planning regulation is thought to act as a barrier to the deployment of mobile infrastructure, local government should make representations to the Ministry of Housing, Communities and Local Government.

When local government is proactive it can catalyse significant change and improvement. This has been demonstrated by metro mayors, who have set clear priorities in policy areas such as transport and housing. It has also been demonstrated by the successful campaigns run by local authorities, examples of which have addressed issues such as fly-tipping and poor public health outcomes.[vi]

The four recommendations above have been inspired by existing examples of local government proactivity on mobile connectivity, some of which are as follows:

1. **Showing leadership and political will.** Some metro mayors have developed – or have started to develop – ambitious digital strategies that include mobile. Some councils – as set out in the cases studies in this document – have committed financial resources to mobile connectivity. Some LEPs have funded programmes related to mobile connectivity.
2. **Creating local government 'digital champions'.** Survey evidence has found that around half of councils have a cabinet member that champions digital issues.[vii] London has a Chief Digital Officer, and the West Midlands and Tees Valley combined authorities have stated intentions to hire one. Collaborations between local bodies – such as "Connecting Cambridgeshire" – are helping to drive a digital agenda. Norfolk County Council has a Digital Innovation and Efficiency Committee.
3. **Providing training to ensure appropriate skills and knowledge.** Some local authorities have job roles based upon improving mobile connectivity. Others have hired staff with experience in the telecommunications industry and have lent neighbouring councils this expertise.
4. **Lobbying to remove barriers to mobile infrastructure deployment.** The remit of the DCMS's Barrier Busting Taskforce is to tackle the barriers to the rollout of full fibre and mobile equipment. Action has been identified as reducing the cost of street works, liberalising the planning regime and simplifying wayleave agreements. The Taskforce was only able to identify some barriers to rollout because key stakeholders made representations to them.[viii]

The above approaches demonstrate that is not just the most senior within a local government organisation that can be proactive in changing the environment for investment in mobile infrastructure. Indeed, previous research on the local government workforce has convincingly argued for a cultural shift towards allowing more junior members of staff to take initiative and make decisions.[ix]

CASE STUDY

Cambridgeshire & Peterborough Combined Authority – Setting a clear direction

The Connecting Cambridgeshire digital programme – which has had notable success in rolling out superfast broadband – is being extended to generate further improvements to mobile, broadband and public wi-fi coverage. It is a proactive approach, which not only seeks to understand the barriers that prevent mobile connectivity from being improved, but also aims to break those barriers down.

The programme has political support from the mayor and a fully-funded and dedicated delivery team. The team is called the Enabling Digital Delivery (EDD), and it will support plans for full fibre networks, 5G mobile and improvements to mobile coverage. The intention is to improve network coverage across the whole geography of the county – including A and B roads, and rail services by 2022.

The EDD has several other responsibilities that will support it in its aims to improve mobile connectivity. These are: developing relationships with mobile network operator working across multiple public sector bodies and boundaries; and, being the point of contact to coordinate wayleaves, street works licences and planning, and making public sector assets available.

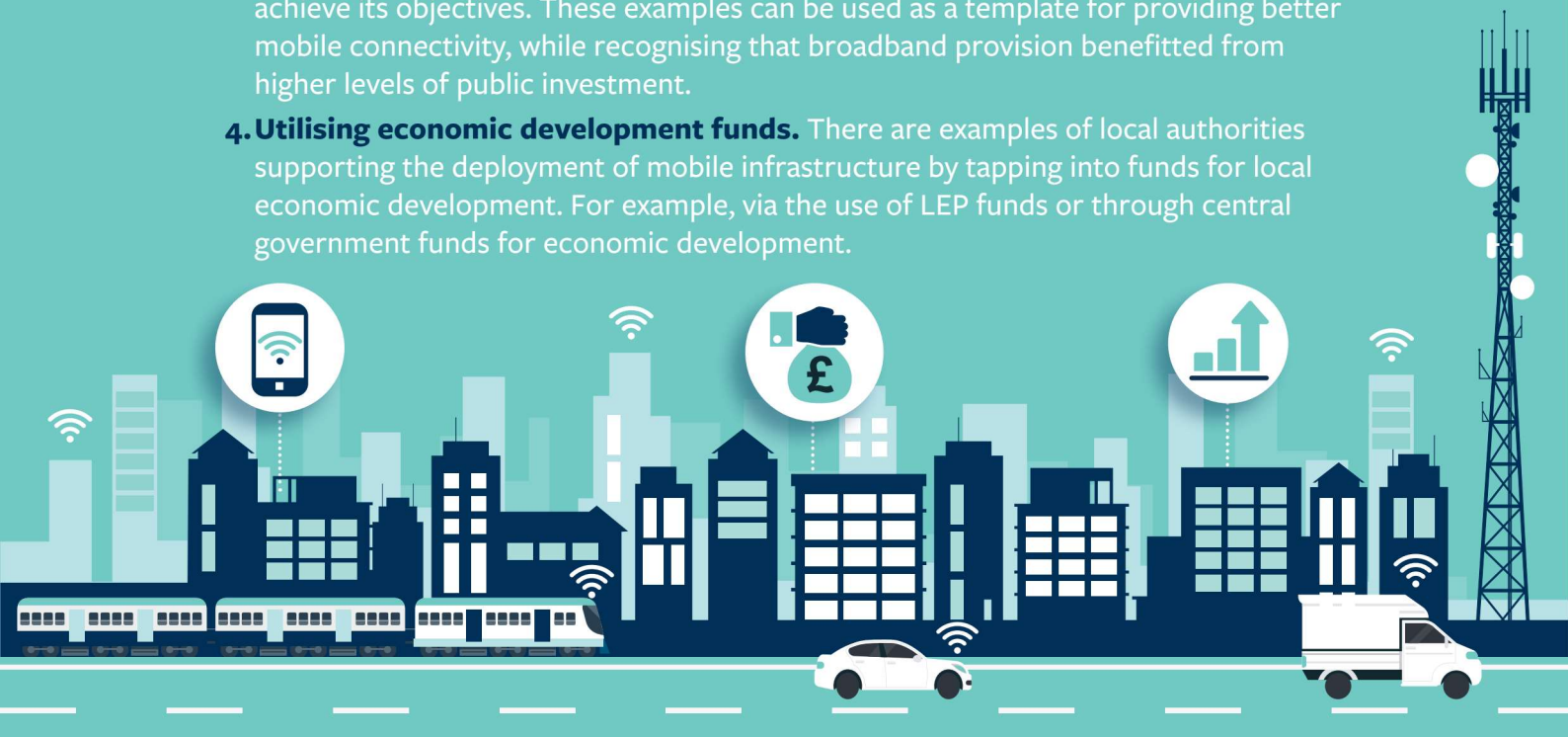
Sources[x]

connecting CAMBRIDGESHIRE

2 PLAN FOR THE LONG-TERM

Local government can create the right environment to improve mobile connectivity by:

1. **Embedding mobile connectivity in plans for local economic development.** The development of mobile infrastructure should be included in Local Plans and all other types of local economic strategy – including those produced by LEPs. This will mean that the importance of mobile connectivity is always considered when thinking about future economic outcomes.
2. **Auditing public sector assets as potential locations for mobile infrastructure.** Using public buildings, structures and open land to install mobile infrastructure has supported widespread improvements to connectivity. The charge for use of these assets should be set on the basis set out in the Electronic Communications Code, and not at rates that disincentivise investment. This will ensure that connectivity is valued over revenue.
3. **Learning lessons from the rollout of broadband.** There are numerous examples – such as Connecting Devon and Somerset and Connecting Cambridgeshire – of how concerted effort has improved broadband provision in local areas. For instance, Connecting Devon and Somerset uses collaborations that involve different tiers of local government, local economic development funding and private providers to achieve its objectives. These examples can be used as a template for providing better mobile connectivity, while recognising that broadband provision benefitted from higher levels of public investment.
4. **Utilising economic development funds.** There are examples of local authorities supporting the deployment of mobile infrastructure by tapping into funds for local economic development. For example, via the use of LEP funds or through central government funds for economic development.



Mobile connectivity is critical to the success of our economy now and in the future. Because of this, local government should embed mobile connectivity into all long-term thinking on economic development – not doing so would marginalise mobile connectivity as an essential component of economic growth. Two examples are:

- **Including mobile connectivity in Local Plans.** At present, this does not happen as a matter of course – many local plans do not make any reference to mobile connectivity and when they do can include outdated information.
- **Working with LEPs to include mobile connectivity in Strategic Economic Plans.** There is undoubtedly opportunity to do this, as many LEPs depend on their Local Authority partners for staff and expertise.[xi]

The substance of long-term thinking should focus upon *what* mobile connectivity needs to be delivered, *where* it is can be delivered and *how* it can be delivered. Action could include:

- **Building a comprehensive understanding of local mobile connectivity.** This could help to understand *what* mobile connectivity needs to be delivered. Ofcom provides data of the indoor, outdoor and 4G coverage of the major network operators.
- **Auditing public sector assets as potential locations for mobile infrastructure.** This could help to understand *where* mobile connectivity can be delivered. For example, Norfolk County Council has publicly stated that it wants to use its assets to improve the consistency and quality of mobile voice and data coverage.[xii]
- **Learning lessons from how outcomes related to broadband were improved.** This could help to understand *how* mobile connectivity can be delivered. For instance, some local areas have facilitated the roll-out of broadband networks by aggregating public sector demand. This could include considering how council offices, libraries, schools, and other buildings from which local services are delivered.[xiii]

There are options to fund these actions outside of existing council budgets. Local economic development funds could be – and have been – used to support the build of mobile infrastructure. An understanding of the funds that are available is important if they are to be used; central government funding for local economic growth is subject to significant churn.[xiv]

CASE STUDY

Norfolk County Council – Planning for a new commercial environment

Norfolk County Council created its Digital Innovation and Efficiency Committee in the summer of 2017. The Committee's remit includes: extending access to superfast broadband across Norfolk; using technology to better deliver Council services; and, championing the ambition to improve digital and mobile connectivity by working with the government and telecoms industry.

The Committee has assessed how the new Electronic Communications Code (ECC) will affect income from telecommunications equipment on the council's property estate. It concluded that the ECC may lead to a reduction in income, but that reduced rents may open-up new sites for mobile operators to use that were not previously economically viable. The decision was to apply new rates quickly to allow operators to commit to new sites. In other words, the council prioritised connectivity over income because of the economic and community benefits it can bring.

To help understand where connectivity is needed, the Committee commissioned a survey to get a better picture of mobile voice and data coverage within the county – the survey was conducted along more than 3,400 miles of Norfolk's roads and at 30 railway stations and on mainline railways. The findings included how many call attempts were successful, where mobile 3G and/or 4G data coverage could be accessed, and how many attempts to browse the web and stream video using mobile data were successful.

The results will be used to work in partnership with mobile providers to improve coverage and tackle notspots. Not only this, but the Council has made the survey data freely available, allowing anybody to analyse mobile connectivity within their area.

Sources[xv]

Norfolk County Council

3 BUILD PARTNERSHIPS AND SHARE BEST PRACTICE

Local government can create the right environment to improve mobile connectivity by:

1. **Exploring different models of collaboration with the mobile industry.** Examples of current partnerships include regular catch-up meetings and roundtables, which support a collaborative approach between the mobile industry and local political and business leaders.
2. **Sharing best practice and skills with other local bodies.** The sharing of best practice is already happening in new structure of local government and economic development, such as combined authorities and Midlands Connect.
3. **Building internal links between departments – barrier busting at a local level.** Ensuring that there are strong links between economic development and planning directorates within local authorities is crucial for a joined-up approach to mobile connectivity.
4. **Establishing "connectivity considerations" as best practice in the planning phase of new developments.** Any development – from upgrades to the road network to new housing estates – should consider connectivity requirements prior to construction beginning, not after construction is complete. At its most basic level, the planning for large-scale developments should include an impact assessment that looks at mobile coverage needs.

Local authorities developing closer relationships with other organisations has frequently been referenced as a way of working that delivers better outcomes.[xvi] For example, guidance on how local authorities and housing associations can work together states that, *"Partnership working is fundamental to meet and manage housing need and demand".*[xvii] It should be noted that mobile operators already do a lot in partnership with public organisations, such as providing connectivity for the emergency services and providing solutions to improve the efficiency of frontline workers.[xviii]

As the recommendations in this section suggest, partnership to support the development of mobile connectivity can be made between very different stakeholders – from councils working with other councils, to councils working with community groups. The nature of the collaboration can vary significantly. For example, the partnership between a council and a LEP in a rural area will likely be quite far removed from the partnership between a council and a mobile operator in an urban area.

There are also ways in which partnerships are facilitated by institutions and legislation. Examples are:

- **The London Office of Data Analytics.** LODA was set up to maximise the use of data in benefiting public service delivery – it has facilitated collaboration between front-line staff tasked with finding new ways of doing things.[xix]
- **The 'Duty to Cooperate'.** There is a legal duty on local planning authorities, county councils in England and public bodies, *"...to engage constructively, actively and on an ongoing basis"* to maximise the effectiveness of Local Plans in cross-border boundary matters.

Partnerships can aid the sharing of best practice, which promotes good ideas and leads to better outcomes. One idea for a best practice approach is to establish "connectivity considerations" in the planning phase of new developments to prevent connectivity issues from arising. This will help to head-off potential connectivity issues arising from complications such as the serving of Notices to Quit to operators – in this instance, alternative sites are often difficult to find, impacting on existing mobile coverage.

CASE STUDY

North Yorkshire County Council – Three key partnerships

North Yorkshire is the largest rural county in England. To help address the typical mobile connectivity issues faced by rural communities, NYCC created the role of "Programme Manager – Mobile Phone Coverage". The creation of this role has allowed three key partnerships to be forged that will create a better environment to improve mobile connectivity:

1. **Partnership One – new links with mobile operators.** Initially, meetings were held on a one-on-one basis with mobile operators and then collectively at a roundtable event facilitated by Mobile UK. The purpose of developing these links was to understand what the operators' plans were for the roll-out of infrastructure, how the council can assist in this and develop a closer working relationship.
2. **Partnership Two – understanding the approaches of planning authorities and economic strategy departments.** This helped to build an understanding of why mobile infrastructure was not going ahead. As a result, the role holder now gets asked by both mobile operators and district councils to review and assist in planning applications.
3. **Partnership Three – accessing funding from the LEP.** The council has been granted £1m from the York, North Yorkshire and East Riding Enterprise Partnership's Local Growth Fund. The funding will support improvements in mobile infrastructure.

The next stage of work for the council is to get a better understanding of the not-spots within the county and understand what other funding is available to facilitate the build of mobile infrastructure. An exercise is also underway to understand it business rate relief can be deployed to support the build of mobile infrastructure.

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How do you perform? A checklist for councils to support mobile connectivity

ADOPT A PROACTIVE APPROACH

ACTION	IN PLACE
Show leadership and political will.	☐
Create local government 'digital champions'.	☐
Provide training to ensure appropriate skills and knowledge.	☐
Lobby to remove the barriers to mobile infrastructure deployment.	☐

PLAN FOR THE LONG-TERM

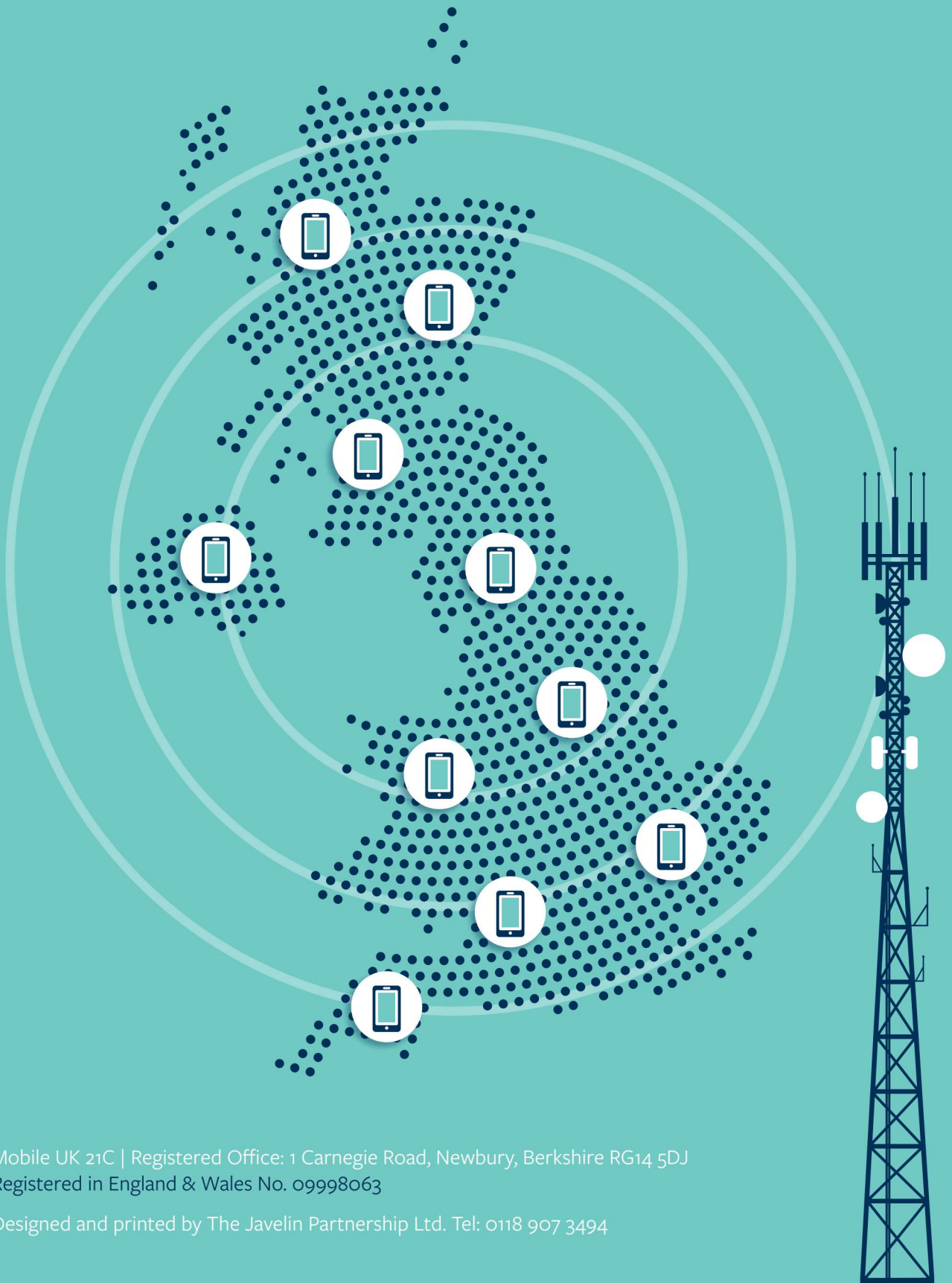
ACTION	IN PLACE
Embed mobile connectivity in plans for local economic development.	☐
Audit public sector assets as potential locations for mobile infrastructure.	☐
Learn lessons from the rollout of broadband.	☐
Utilise economic development funds.	☐

BUILD PARTNERSHIPS AND SHARE BEST PRACTICE

ACTION	IN PLACE
Explore different models of collaboration with the mobile industry.	☐
Share best practice and skills with other local bodies.	☐
Build internal links between departments.	☐
Establish "connectivity considerations" as best practice in the planning phase of new developments.	☐

BUILDING MOBILE BRITAIN

Mobile UK



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EXISTING SITE PLAN

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NOTES:

1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

Master:	MBNL / EE / H3G:	Project:	Purpose of Issue:	Issue:
M001	MBNL	NTQ	Planning	A

Date:	25.04.2022
Drawn:	R.Nugent
Checked:	G.Tinney
Approved:	J.Murray

Revision / Upgrade Description:
First Issue

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Available 8am-6pm Monday to Friday

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Hertfordshire
AL10 9BW
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Mobile Broadband Network Limited
Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX

Design Consultant:

P2ML

Site Name:
HUCCLECOTE ROAD RETAIL

Site ID:
1649345

Address:
LAND AT 57 HUCCLECOTE ROAD,
HUCCLECOTE ROAD,
GLOUCESTER,
GLOUCESTERSHIRE
GL3 3TL

Title:
100 EXISTING SITE PLAN

Project:
NTQ

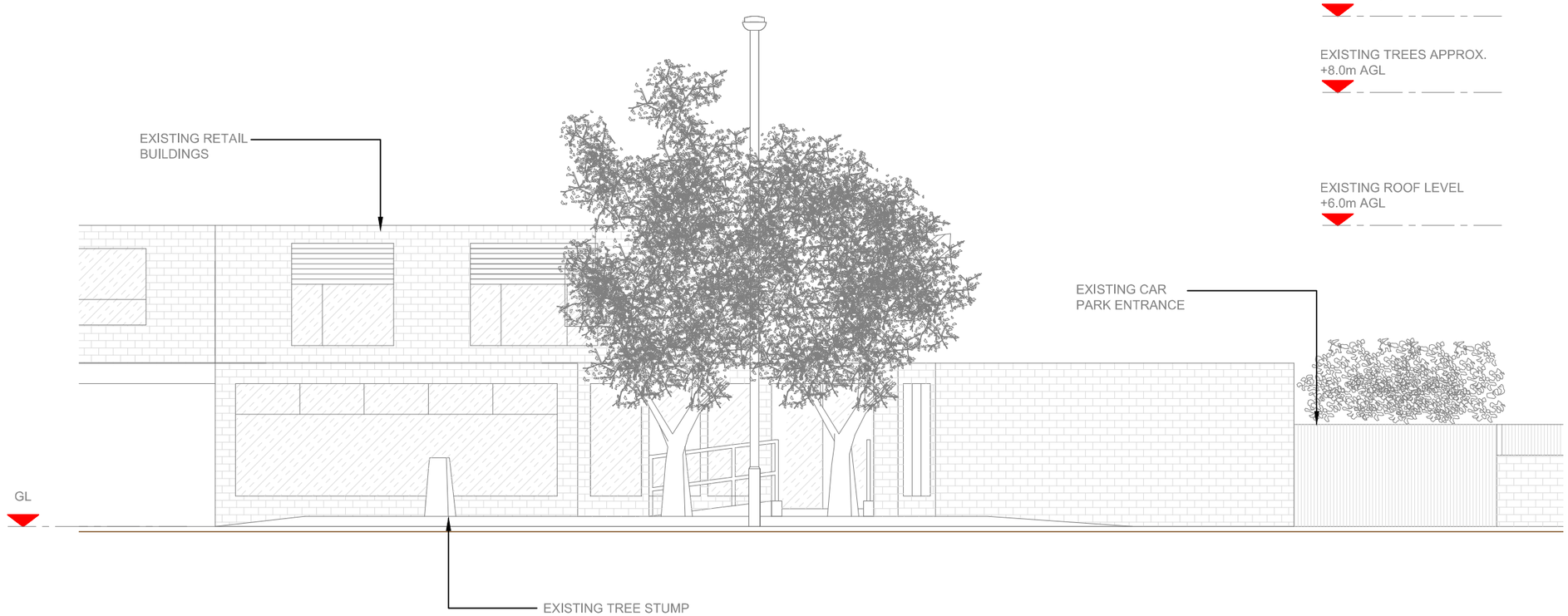
Purpose of Issue:
GENERAL ARRANGEMENT

EE Cell ID:	MBNL Cell ID:	3UK Cell ID:
79893	GLO062	-

Master Drawing No:
1649345_79893_GLO062_TBC_M001

Issue:
A

V 1.8



EXISTING ELEVATION A

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NOTES:

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Design Consultant:

P2ML

Site Name:
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Site ID:
1649345

Address:
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Title:
150 EXISTING ELEVATION A

Project:
NTQ

Purpose of Issue:
GENERAL ARRANGEMENT

EE Cell ID:	MBNL Cell ID:	3UK Cell ID:
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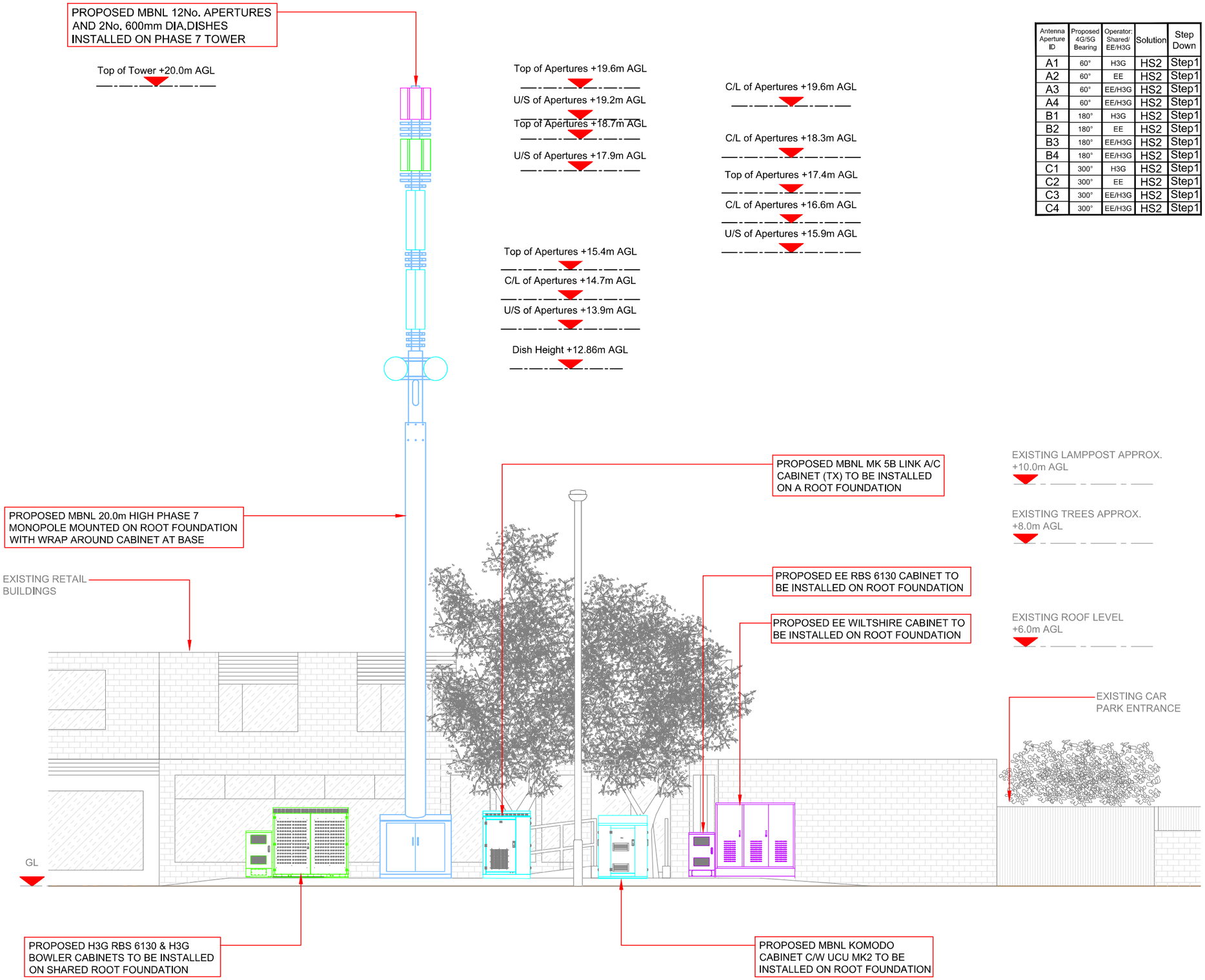
Master Drawing No:
1649345_79893_GLO062_TBC_M001

Issue:
A

v1.8

V 1.8



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A2	60°	EE	HS2	Step1
A3	60°	EE/H3G	HS2	Step1
A4	60°	EE/H3G	HS2	Step1
B1	180°	H3G	HS2	Step1
B2	180°	EE	HS2	Step1
B3	180°	EE/H3G	HS2	Step1
B4	180°	EE/H3G	HS2	Step1
C1	300°	H3G	HS2	Step1
C2	300°	EE	HS2	Step1
C3	300°	EE/H3G	HS2	Step1
C4	300°	EE/H3G	HS2	Step1

NOTES:

1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

MAX CONFIGURATION SITE	
CONFIG TYPE	HS2

Master:	MBNL / EE / H3G:	Project:	Purpose of Issue:	Issue:
M001	MBNL	NTQ	Planning	A

Date:	25.04.2022
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Site ID: 1649345

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Title: 265 MAX CONFIGURATION ELEVATION

Project: NTQ

Purpose of Issue: GENERAL ARRANGEMENT

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79893	GLO062	-

Master Drawing No: 1649345_79893_GLO062_TBC_M001

Issue: A

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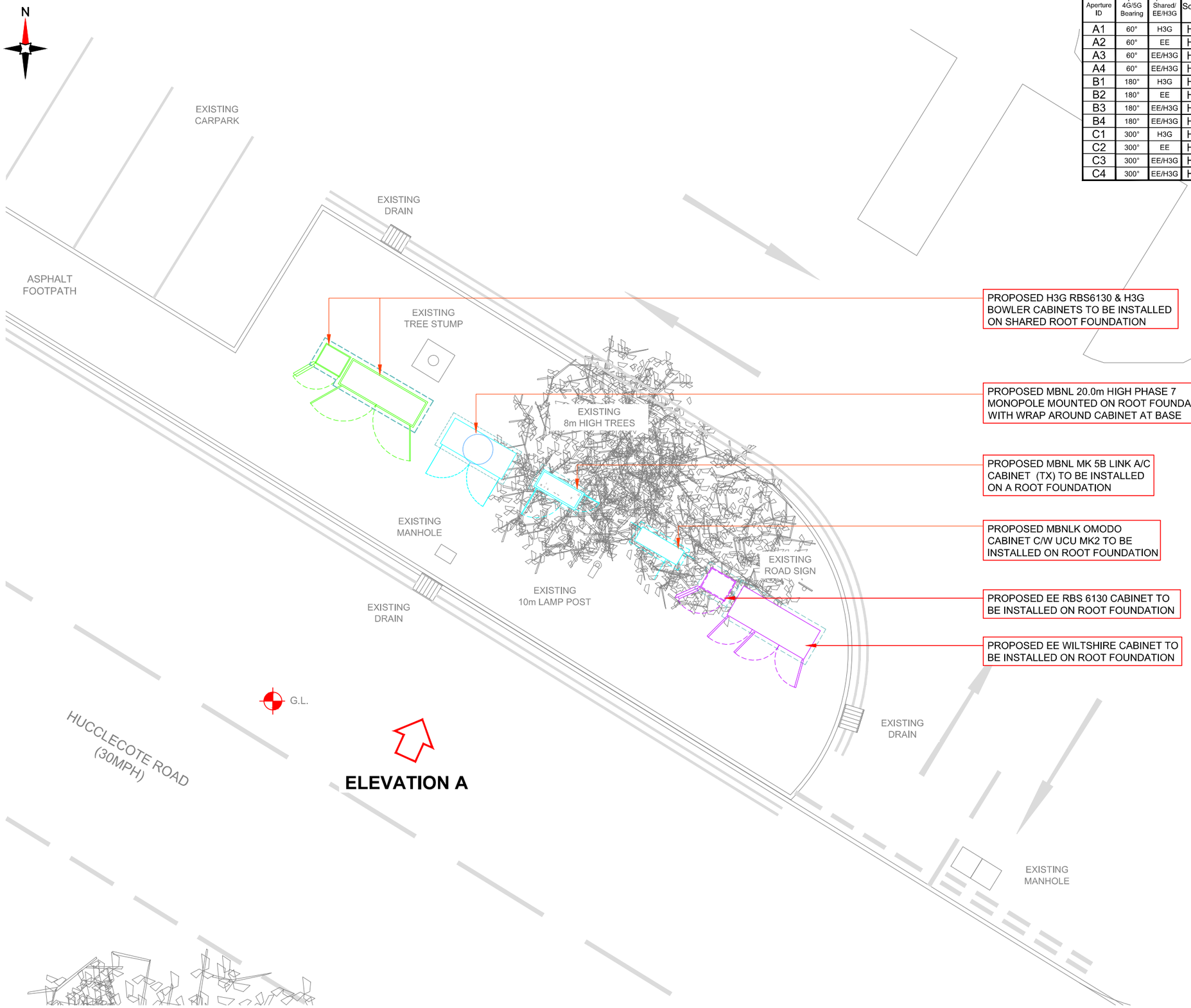

PROPOSED MAX CONFIGURATION SITE PLAN

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Antenna Aperture ID	Proposed 4G/5G Bearing	Operator: Shared/ EE/H3G	Solution	Step Down
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A2	60°	EE	HS2	Step1
A3	60°	EE/H3G	HS2	Step1
A4	60°	EE/H3G	HS2	Step1
B1	180°	H3G	HS2	Step1
B2	180°	EE	HS2	Step1
B3	180°	EE/H3G	HS2	Step1
B4	180°	EE/H3G	HS2	Step1
C1	300°	H3G	HS2	Step1
C2	300°	EE	HS2	Step1
C3	300°	EE/H3G	HS2	Step1
C4	300°	EE/H3G	HS2	Step1

NOTES:

1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

MAX CONFIGURATION SITE	
CONFIG TYPE	HS2

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Site ID: 1649345

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Title: 215 MAX CONFIGURATION SITE PLAN

Project: NTQ

Purpose of Issue: GENERAL ARRANGEMENT

EE Cell ID:	MBNL Cell ID:	3UK Cell ID:
79893	GLO062	-

Master Drawing No: 1649345_79893_GLO062_TBC_M001 Issue: A