



**Town Planning Statement
incorporating
Design and Access**

Shared Rural Network

**Installation of Electronic Communications Apparatus at the Existing
Base Station at Bell Hill, off Unclassified Road, Blindburn,
Northumberland, NE65 7DD**

Site Reference: EAS0103

May 2024

1. Introduction

1.1 This statement is submitted in support of an application for planning permission for upgrade works at an existing base station for the rollout of the Shared Rural Network (SRN).

1.2 The application includes:

- A description of the site and surrounding area
- A description of the proposal
- A statement of community engagement
- A review of planning policy considerations
- A review of design and access considerations

1.3 A number of other accompanying documents have been submitted in support of the application and should be viewed in conjunction with this statement.

2. Site Location

- 2.1 The application location is the site of an existing 20m high lattice telecommunications installation within a fenced compound. The existing installation was approved in May 2018 under application reference 18NP0023. The site comprises of the lattice tower, ground based equipment within a foul weather enclosure and permission to install 3 no. antennas and 3 no. dishes.
- 2.2 The application site is located in open countryside at Bell Hill within the MOD Otterburn Army Training Estate. The site is located approximately 8.5km northwest of the small settlement of Alwinton. It is also located approximately 4.5km southeast of the border with Scotland.
- 2.3 The site falls within the Northumberland National Park.

3. Proposed Development

- 3.1 The development proposed is shown in detail in the drawings submitted showing a 2.5m tower extension, new antennas and ground-based equipment contained within the footprint of the existing compound. The proposed works are required as part of the deployment of the Shared Rural Network.

What is the Shared Rural Network?

- 3.2 The Shared Rural Network is a world-leading £1 billion government deal with the UK's four Mobile Network Operators (MNOs) EE, O2, Three and Vodafone, that will see both public and private investment to extend the coverage of the mobile networks into areas not served, or only partially served, thereby levelling up connectivity across the UK. The programme will deliver reliable mobile broadband to 95% of the UK, addressing the digital divide by improving 4G coverage in the areas that need it most, boosting productivity and encouraging investment in rural areas. It is expected to provide coverage to an additional 280,000 premises and for people in cars on an additional 16,000km of the UK's roads.

The Emergency Services Network and the Shared Rural Network

- 3.3 The Home Office is currently investing in an upgraded communications network, the Emergency Services Network (ESN). ESN is required to provide a mobile signal to serve the Emergency Service users across the UK. To ensure sufficient geographic coverage for the Emergency Services, the ESN programme is delivering new radio sites in the most remote areas to provide locations from which the ESN signal can be transmitted. This site was approved as part of the Emergency Services Network rollout.
- 3.4 To support the SRN initiative, the Home Office and the Department for Digital, Culture, Media & Sport (DCMS) have agreed that the Home Office radio sites should be made available where practicable to provide commercial services to the public as well as the specialist services provided by ESN.
- 3.5 Adding SRN to the Home Office structures already built or in the planning stage achieves two main objectives. The Home Office radio sites are positioned in specific locations because there is little or no mobile signal at that position and so adding the public network signals will fill in what would otherwise be a Not Spot. A secondary benefit is that using an existing location removes the need to build additional structures in the vicinity.
- 3.6 The practical realisation of implementing SRN at a Home Office radio site typically requires the installation of two additional elements. Firstly, a set of additional cabinets to house the commercial network equipment, usually positioned within the established compound. Secondly, further antennas and associated equipment would be installed on the mast itself. To support the installation of the additional antennas an overall height increase of the tower is required.

The Proposal

- 3.7 This rollout has significant technical and operational requirements, and this has implications on the height and design of the upgraded base station. The principal elements of the proposed development at the application site reflect these various factors. The upgrade works require the installation of the apparatus listed below:
- The installation of a 2.5m tower extension to the existing mast;
 - The relocation of 3 no. antennas and 2 no. dishes to the top of the tower extension (approved under application 18NP0023);
 - 6 no. new antennas;
 - 6 no. new equipment cabinets;
 - 4 no. new GPS nodes;
 - Associated ancillary development including remote radio units, mast head amplifiers and cabling.
- 3.8 The application site has been selected as this will provide the required level of network coverage required whilst utilising an existing site location to aid the successful rollout of the Shared Rural Network.

4. Prior Engagement

- 4.1 The recently revised National Planning Policy Framework (NPPF) and the Code of Practice for Wireless Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received green when assessed against the traffic light rating model as referenced in the Code of Practice.

- 4.2 In this instance, the proposal involves the upgrade of an existing installation. As an acceptable form of development can be brought forward as explained further within this statement, formal pre-application engagement with the LPA was not undertaken. The local ward Councillor and Alwinton Parish Council have been advised on the proposal. If you do have detailed comments to make on the proposal, we are pleased to discuss these with you at an early stage in the application process.

5. Planning Policy

5.1 This section sets out the most relevant national and local planning policy concerning the proposed development.

- National Planning Policy Framework (NPPF);
- UK Digital Strategy;
- Code of Practice for Wireless Network Development in England;
- Northumberland National Park Local Plan.

5.2 From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development.

5.3 The UK government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks. *'The government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile phones anywhere they go.'* DCMS, May 2016

National Planning Policy Framework – Supporting high quality communications

5.4 The NPPF, para. 114 states *'advanced, high quality and reliable communications infrastructure is **essential for economic growth and social well-being**. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.'*

5.5 Para 115 continues *'the number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. **Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged.'***

5.6 Section 15 relates to conserving and enhancing the natural environment. Para 176 seeks to protect National Parks and states that *'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks...The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.'*

- 5.7 Upgrading this telecommunication base station to support the Shared Rural Network rollout will fully meet the NPPFs acknowledged importance of good digital communications allowing customers access to this essential service.

UK Digital Strategy: 2022

- 5.8 In June 2022, the UK Digital Strategy was published by the Department for Digital, Culture, Media & Sport. The strategy is directly relevant to this proposal. *‘Digital infrastructure plays a vital role in our daily lives and is the foundation of a thriving digital economy. Every part of the UK needs world-class, secure digital infrastructure that enables people to access the connectivity and services they need – where they live, work or travel. This is why enhancing digital connectivity is Mission Four of the Government’s Levelling Up White Paper³². Our goal is to ensure that everyone, wherever they live or work in the UK, can access the connectivity and services they need for the ever-digitising world.’*
- 5.9 It continues *‘The Department for Digital, Culture, Media and Sport (DCMS) is leading an ambitious programme of work to both accelerate the commercial delivery of nationwide gigabit broadband and **ensure rural areas are not left behind.**’*
- 5.10 It further states *‘The UK is also making significant progress in rolling out wireless connectivity, with 92% of the UK landmass currently covered by a good 4G signal from at least one operator. The Shared Rural Network³³ will further improve coverage for 280,000 premises and 16,000km of roads, with the biggest anticipated coverage improvements in rural Scotland, Northern Ireland and Wales.’*
- 5.11 There is currently limited telecommunications service provision in this area. The proposal to introduce additional operators into the area as part of the Shared Rural Network fully supports the aims and objectives of the UK Digital Strategy.

Code of Practice for Wireless Network Development in England

- 5.12 The new Code of Practice was published in March 2022. This document replaces the code of best practice published in 2016. It is intended to facilitate the smooth roll-out and upgrading of mobile telecommunications apparatus across England.
- 5.13 It’s policy framework states *‘Digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK’* and *‘As the demand for mobile data in the United Kingdom is increasing rapidly, it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.’*
- 5.14 The Code of Practice encourages site sharing as it reduces the total number of sites required and minimises visual intrusion. It also recognises the need for larger structures in these instances.

Northumberland National Park Local Plan

- 5.15 At local level, the proposal has been considered against the Northumberland National Park Local Plan, adopted July 2020. Sustainability lies at the heart of its strategic aims.
- 5.16 It recognises that *'high-speed broadband and mobile phone coverage is patchy (at-best) across much of the National Park'* and it seeks to support *'the provision of new broadband and mobile telecommunication infrastructure where it can be accommodated without serious harm to the National Park's special qualities.'*
- 5.17 It further states *'improving broadband and mobile telecommunications services is an important objective in the National Park Management Plan. Such services are now an integral part of modern lifestyles and business operations, and an essential pre-requisite for attracting the sort of business with the scope for sustainable growth in the National Park. They are also vital in remote rural areas to provide on-line access to services that are otherwise physically located many miles away. Better broadband and mobile services will not only benefit residents and businesses but also the millions of people who visit the National Park each year.'*
- 5.18 It also acknowledges the difficulty that arises when introducing this type of infrastructure into the National Park. *'The remoteness and terrain of the National Park imposes limitations and costs on infrastructure, which mean deficiencies, continue to exist. These are usually to the detriment of local communities and business. Although there needs to be an element of realism in the level of infrastructure that can be achieved, improvements are still potentially realisable in some of the most basic services.'*
- 5.19 Policy DM1: Community Facilities and Infrastructure is relevant to this proposal.

Infrastructure

5. Proposals that would result in the loss of infrastructure will not be permitted, unless it can be demonstrated that the infrastructure is no longer suitable or required.
6. Proposals for new, improved or supporting infrastructure will be permitted where:
 - a) They represent the least harmful option reasonably available having regard to any operational requirements and technical limitations that are applicable;
 - b) The design minimises impact on visual amenity, including the character and appearance of the locality and the wider landscape;

- c) There are no unacceptable adverse impacts on the National Park's special qualities;
 - d) They will not have a harmful impact on the wider environment particularly in relation to flood risk.
7. When no longer required for its approved purpose all infrastructure shall be removed and the site suitably restored to its former condition where it is appropriate to do so.
- 5.20 This policy recognises that infrastructure provision is key to sustainable development, economic growth and future development. It aims *'support new infrastructure that addresses current shortfalls or enhances provision, subject to its associated impacts being acceptable.'*
- 5.21 The proposed upgrade works utilises an existing telecommunications location within the National Park and negates the need for an additional new structure within the vicinity. It meets the criteria for sustainability; the provision of adequate telecommunications infrastructure allows people to work from home, access services, aids social inclusion and encourages investment within the National Park. It is set within a secluded location and benefits from rising land which provides a degree of screening of the installation from certain vantage points. The extension and additional equipment have been sensitively designed and are the minimum necessary for the successful deployment of the Shared Rural Network.
- 5.22 The operational requirements for the Shared Rural Network at this location are wholly contained within the National Park and therefore additional infrastructure at this location is unavoidable if the network requirements are to be realised. It is recognised that operators face difficulties when deploying infrastructure within sensitive landscapes. The current proposal would allow operators to co-locate on one structure and avoid the proliferation of installations in the wider National Park area.
- 5.23 It is considered that the proposed development is in accordance with national and local policy and endeavours as far as is practicable to minimise environmental impact whilst meeting the technical requirements to rollout the Shared Rural Network which will have considerable social and economic benefits to the residents, businesses, those who pass through the area and those that travel to enjoy all the National Park has to offer.

6. Design

- 6.1 The design of the proposal has been carefully considered with the current proposal the most sensitive design available, deployed at the minimum height possible that will allow the technical requirements of the site to be met.
- 6.2 It is acknowledged that the increased height means the structure will be visible across a wider area, however the lattice structure will allow views through it and aid assimilation with the skyline over longer distances.
- 6.3 The number of proposed antennas is necessary to aid the successful deployment of the Shared Rural Network and are the minimum necessary to provide adequate coverage. Antenna size and design is determined by technical and operational requirements.
- 6.4 The equipment cabinets number and size have been limited to only what is required to meet the current proposed network requirements. They are to be located at the base of the structure and coloured RAL6009 Fir Green to further help them assimilate. The cabinets can be coloured to the planning authority's request.
- 6.5 It is considered that utilising and upgrading an existing structure is superior to deploying a new additional installation within the area and thereby lessens the overall environmental impact on the immediate and wider National Park area.
- Access
- 6.6 Access to the site is via the existing track extending south and northeast of the site. Access to the site is restricted to authorised persons only and upon build completion would be visited periodically for routine maintenance.

Health And Safety

- 7.1 All installations are required to be compliant with international standards adopted by the UK Government. The proposal has been designed to accord with, and operate in accordance with, ICNIRP guidelines on public exposure.
- 7.2 A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure accompany this application.
- 7.3 Accordingly, in line with national policy, it is not necessary to consider further any health aspects and concerns about them, which include the perception of risk.

8 Summary and Conclusion

- 8.1 In summary, the application is in respect of electronic communications base station upgrade. The upgrade will form part of the successful rollout of the Shared Rural Network.
- 8.2 The proposed upgrade is in the public interest as it will connect rural communities enabling social and economic interaction, enhanced education, and supports well-being, including addressing issues such as social isolation and exclusion.
- 8.3 The proposal has followed national and local planning policy and best practice guidance in the siting and design of its apparatus at an existing location, negating the need for an additional new structure thereby avoiding proliferation of masts in the immediate and wider National Park area.
- 8.4 The proposal complies with will all relevant health and safety requirements and is ICNIRP complaint.
- 8.5 The application is acceptable as a matter of principle and appropriate in its detail. The proposed installation represents both the optimum planning, environmental and technical solution in this instance without the need for an additional new structure in the vicinity.
- 8.6 In conclusion, this statement has demonstrated that the proposal is in accordance with national and local policy. The proposal would result in a moderate magnitude of visual change and any harm should be weighed against the considerable public benefit generated by the provision of the Shared Rural Network rollout in this area. It is considered that on balance the proposal would provide more benefits than harm and as such should be supported.