



Clarke Telecom Limited
Unit E, Madison Place, T: +44 (0) 161 785 4500
Northampton Road, Manchester,
M40 5AG, UK F: +44 (0) 161 785 4501
www.clarke-telecom.com

Our ref: COP020

The Chief Planning Officer
Cumberland Council (Copeland Area)
The Market Hall
Market Place
Whitehaven

CA28 7JG

development.control@copeland.gov.uk

Via Email

13th April 2023

Dear Planning,

PRECONSULTATION – UPGRADE TO EXISTING RADIO BASE STATION INSTALLATION AT MBNL_COP020, PARISH CHURCH OF EGREMONT ST MARY AND ST MICHAEL, EGREMONT, CA22 2AW (NGR E: 301100, N: 510570)

Clarke Telecom Ltd act on behalf of the mobile telecommunications operator MBNL. MBNL undertakes the management and network deployment of telecommunications sites on behalf of both EE (UK) Ltd and Three (UK) Ltd. The proposal is for the upgrade of the above existing MBNL and EE Ltd site, in order to provide 4G technology to the area.

As part of MBNL's continued network improvement program, there is a specific requirement for an upgrade to the installation at the church to ensure that the latest high quality 2G, 3G and 4G service provision continues to be provided. This ensures that coverage and capacity requirements are maintained with the minimalist of amendments to an established radio base station.

This letter therefore invites the Local Planning Authority and stakeholders, in accordance with planning policy guidance and Best Practice Commitments, to enter into pre-application discussions with regard to our preferred site option prior to a formal planning submission. Several steps in the site identification process have already been undertaken. The Local Planning Authority mast register and our records of other potential sites have been reviewed, the policies in the Development Plan have been taken into account and we have examined the inter-operator site sharing database.

Mobile telecoms networks are now ubiquitous throughout the UK. It is an expectation that an individual can connect and use their mobile phone whenever and wherever they are. With the advent of new technology, further advances are proposed and Central Government has seen the telecoms industry to be at the forefront of economic development.

The proposed works will enable enable Three (UK) Ltd to provide 4G coverage to this area of Egremont. The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. That is why the Government is committed to extending mobile geographical coverage further across the UK, with continuous mobile connectivity provided to all major roads and to being a world leader in mobile technology. This will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage.



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As well as improved mobile signal, improved mobile technology services are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for future technology implementation is central to achieving the Government's objective to deliver prosperity at the local level and enable all places to share in the proceeds of growth.

Improved mobile service provision will bring faster, more responsive and reliable connections than ever before. More than any previous generation of mobile networks, it has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time, the 'Internet of Things'. This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for business and farmers, all through the real-time management of data.

The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.

The upgraded base station will also meet the extra demands on the network in this area as more people use internet enabled handheld devices.

The preferred MBNL option is as follows:

COP020, PARISH CHURCH OF EGREMONT ST MARY AND ST MICHAEL, EGREMONT, CA22 2AW (NGR E: 301100, N: 510570)

The proposal relates to the replacement of 3 no. antennae and the installation of 1 no. GPS node, to be located externally mounted off an upgraded antenna support pole, internal works, as well as ancillary development thereto.

As this is an existing installation, this is sequentially the most preferable site for the operators to upgrade their existing service provision to this cell area. As such no other options have been considered.

The proposal for this MBNL site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines.

Finally, we would be interested in any local stakeholders or groups that you consider would like to know more about our proposals and look forward to receiving your comments on the preferred option identified above. For your information pre-consultation letters and a set of plans have been sent to the local ward councillor for Egremont ward.

We enclose a copy of our Consultation Plan and welcome your suggestions, and look forward to receiving your response within 14 days of the date of this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Louis Freeman".

Louis Freeman

Graduate Acquisition Surveyor

Email: louis-freeman@clarke-telecom.com

Tel: +44 (0) 7826 288781

(For and on behalf of EE (UK) Ltd and Three (UK) Ltd)

Louis Freeman

From: Louis Freeman
Sent: 13 April 2023 17:04
To: development.control@copeland.gov.uk
Subject: Pre-consultation - MBNL COP020 - Upgrade of Radio Base Station Installation
Attachments: COP020 Cumberland LPA Precon Letter.pdf; COP020 Proposed Plans.pdf; COP020 Consultation Plan.xlsx

Dear Planning,

Please find attached a revised copy of the pre-application consultation letter I sent to you recently, along with the proposed plans in relation to the proposed replacement of the existing telecommunications installation at the above site.

If you have any comments, they would be gratefully received. If there is no fee for such a response, these can either be submitted by email or by returning the Consultation Plan attached.

Kind regards,

Louis Freeman

From: Microsoft Outlook
To: development.control@copeland.gov.uk
Sent: 13 April 2023 17:05
Subject: Relayed: Pre-consultation - MBNL COP020 - Upgrade of Radio Base Station Installation

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development.control@copeland.gov.uk (development.control@copeland.gov.uk)

Subject: Pre-consultation - MBNL COP020 - Upgrade of Radio Base Station Installation



Pre-consultation -
MBNL COP020...

Louis Freeman

From: Chloe Unsworth <Chloe.Unsworth@Cumberland.gov.uk>
Sent: 24 April 2023 15:33
To: Louis Freeman
Subject: RE: Pre-consultation - MBNL COP020 - Upgrade of Radio Base Station Installation

Follow Up Flag: Follow up
Flag Status: Completed

Dear Louis,

Thanks for your pre-application letter regarding the upgrade works at ST MARYS AND ST MICHAELS, CHURCH STREET, EGREMONT, CUMBRIA, CA22 2AY.

I have now had the opportunity to review the site on the Council's GIS mapping system and the information submitted as part of this enquiry. I would advise the building is Grade II listed and it falls within Egremont Conservation Area. On this basis, both planning permission and listed building consent will be required.

Planning Policy

On 1st April 2023, Copeland Borough Council ceased to exist and was replaced by Cumberland Council as part of the Local Government Reorganisation of Cumbria.

Cumberland Council inherited the local development plan documents of each of the sovereign Councils including Copeland Borough Council, which combine to form a Consolidated Planning Policy Framework for Cumberland. The inherited local development plan documents continue to apply to the geographic area of their sovereign Councils only.

These comments are made as pre-application advice and are based on Policies set out in the adopted Local Plan (Copeland Local Plan 2013 – 2028) and other material planning considerations including Government guidance set out in the NPPF.

The following policies of the Copeland Local Plan 2013 – 2028 relevant to this proposal are as follows:

- Policy ST1 – Strategic Development Principles
- Policy ST2 – Spatial Development Strategy
- Policy T2 – Information and Communications Technology
- Policy ENV4 – Heritage Assets
- Policy ENV5 – Protecting and Enhancing the Borough's Landscapes
- Policy DM23 – Information and Communications Technology
- Policy DM27 – Built Heritage and Archaeology

You can access the Copeland Local Plan 2013 – 2028 using the link below. This contains details of the relevant policies listed above.

http://www.copeland.gov.uk/sites/default/files/attachments/copeland_local_plan_2013_2028.pdf

Advice

Developments which seek to extend or improve connectivity through existing and emerging telecommunications in the Copeland area will be supported subject to appropriate safeguards, which are considered below.

Policy DM23 requires proposals to generally avoid high quality landscapes, particularly visually prominent locations. The siting and design of equipment will need to minimise the impact on the surrounding area.

In addition, the availability of alternative sites or possible sharing facilities with other operators must be considered. As the proposal will upgrade existing equipment and it will not be higher than the top of the existing structure, this proposal is likely to be acceptable.

Given the nature of the heritage asset, the Conservation Officer raised some concerns with drilling through masonry and mounting things to masonry. I have attached his contact details if you wish to discuss the proposal further - Samuel.Woodford@copeland.gov.uk.

Please note that the advice in this email is given in good faith on the basis of the information available at the present time. The advice may be subject to revision following further examination or consultation, or where additional information comes to light, and is therefore not binding on any future recommendation which may be made to the Council or any formal decision by the Council.

Kind regards

Chloe Unsworth

Planning Officer | Development Management
Thriving Place and Investment | Cumberland Council
The Market Hall | Market Place | Whitehaven | CA28 7JG
T. 01946 598537
Email: chloe.unsworth@cumberland.gov.uk



From: Louis Freeman <Louis.Freeman@Clarke-Telecom.com>
Sent: Thursday, April 13, 2023 5:04 PM
To: Development Control <Development.Control@copeland.gov.uk>
Subject: Pre-consultation - MBNL COP020 - Upgrade of Radio Base Station Installation

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Kind regards,

Louis Freeman | Graduate Acquisition Surveyor
Clarke Telecom

T: +44 161 785 4500
M: +44 7826 288 781
E: Louis.Freeman@clarke-telecom.com
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Head Office: Clarke Telecom Ltd, Unit E, Madison Place, Northampton Road, Manchester, M40 5AG. Tel. +44 (0)161 785 4500.
Registered Office: 3175 Century Way, Thorpe Park, Leeds, LS15 8ZB. Registered in England No. 07524755.



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Our ref: COP020

Councillor Sam Pollen

9 St Bridgets Lane
Egremont

CA22 2BB

sam.pollen@cumberland.gov.uk

Via Email

13th April 2023

Dear Cllr Pollen,

PRECONSULTATION – UPGRADE TO EXISTING RADIO BASE STATION INSTALLATION AT MBNL_ COP020, PARISH CHURCH OF EGREMONT ST MARY AND ST MICHAEL, EGREMONT, CA22 2AW (NGR E: 301100, N: 510570)

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The purpose of this letter is to consult with you and seek your views on our proposal before any planning submission is made. We understand that you are not always able to provide site specific comments, however, MBNL are committed to consultation with communities on our mobile telecommunications proposals and as such would encourage you to respond.

As part of MBNL's continued network improvement program, there is a specific requirement for an upgrade to the existing installation at the church to ensure that the latest high quality 2G, 3G and 4G service provision continues to be provided in this area of Copeland. This ensures that coverage and capacity requirements are maintained with the minimalist of amendments to an established radio base station.

Mobile telecoms networks are now ubiquitous throughout the UK. It is an expectation that an individual can connect and use their mobile phone whenever and wherever they are. With the advent of new technology, further advances are proposed and Central Government has seen the telecoms industry to be at the forefront of economic development.

The proposed works will enable Three (UK) Ltd to provide 4G coverage to this area of Egremont. The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. That is why the Government is committed to extending mobile geographical coverage further across the UK, with continuous mobile connectivity provided to all major roads and to being a world leader in mobile technology. This will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage.

As well as improved mobile signal, improved mobile technology services are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local



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Industrial Strategies. Enabling and planning for future technology implementation is central to achieving the Government's objective to deliver prosperity at the local level and enable all places to share in the proceeds of growth.

Improved mobile service provision will bring faster, more responsive and reliable connections than ever before. More than any previous generation of mobile networks, it has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time, the 'Internet of Things'. This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for business and farmers, all through the real-time management of data.

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The preferred MBNL option is as follows:

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As this is an existing installation and the amendments are visually minor in nature, this is sequentially the most preferable site for the operators to upgrade their existing service provision to this cell area. As such no other options have been considered.

The proposal for this MBNL site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines

In order to give you time to send your comments or request further information, we commit to allow at least 14 days before a notification is submitted to the Local Planning Authority. This 14 day period starts from the date at the top of this letter.

For your information pre-consultation letters and a set of plans have been sent to the local planning officers and other local stakeholders.

We look forward to receiving your response within 14 days of the date of this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Louis Freeman".

Louis Freeman

Graduate Acquisition Surveyor

Email: louis-freeman@clarke-telecom.com

Tel: +44 (0) 7826 288781

(For and on behalf of EE (UK) Ltd and Three (UK) Ltd)

Louis Freeman

From: Louis Freeman
Sent: 13 April 2023 17:05
To: sam.pollen@cumberland.gov.uk
Subject: Pre-consultation Re-issue - MBNL COP020 - Upgrade of Radio Base Station Installation
Attachments: COP020 Cllr Pollen Precon Letter.pdf; COP020 Proposed Plans.pdf; COP020 Consultation Plan.xlsx

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Pre-consultation
Re-issue - MB...



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Our ref: COP020

Egremont Town Council
Market Hall Offices
Market Street
Egremont
Cumbria

CA22 2DF

contact@egremonttowncouncil.co.uk

Via Email

13th April 2023

Dear Sir/Madam,

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The proposal for this MBNL site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines.

We enclose a copy of our Consultation Plan and welcome your suggestions.

We look forward to receiving your response within 14 days of the date of this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Louis Freeman".

Louis Freeman
Graduate Acquisition Surveyor
Email: louis-freeman@clarke-telecom.com
Tel: +44 (0) 7826 288781

(For and on behalf of EE (UK) Ltd and Three (UK) Ltd)

Louis Freeman

From: Louis Freeman
Sent: 13 April 2023 17:04
To: contact@egremonttowncouncil.co.uk
Subject: Pre-consultation - MBNL COP020 - Upgrade of Radio Base Station Installation
Attachments: COP020 Egremont Town Council Precon Letter.pdf; COP020 Proposed Plans.pdf; COP020 Consultation Plan.xlsx

Dear Sir/Madam,

Please find attached a pre-application consultation letter and proposed plans in relation to the proposed replacement of the existing telecommunications installation at the above site.

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Kind regards,

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Pre-consultation -
MBNL COP020...

Our ref: COP020

13th April 2023

Mr Russell Hardy of Bookwell Primary School

Bookwell
Egremont
Cumbria

CA22 2LT

By email to: head@bookwell.cumbria.sch.uk and admin@bookwell.cumbria.sch.uk

Dear Mr Hardy,

PRECONSULTATION – UPGRADE TO EXISTING RADIO BASE STATION INSTALLATION AT MBNL_ COP020, PARISH CHURCH OF EGREMONT ST MARY AND ST MICHAEL, EGREMONT, CA22 2AW (NGR E: 301100, N: 510570)

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As part of MBNL's continued network improvement program, there is a specific requirement for an upgrade to the existing installation at the church to ensure that the latest high quality 2G, 3G and 4G service provision continues to be provided.

The proposal, which we feel is the best solution to serve our customers in the local community, will include the replacement of 3 no. antennae and ancillary development thereto. As this is an existing installation and the amendments are visually minor in nature, this is sequentially the most preferable site for the operators to upgrade their existing service provision to this cell area.

All EE (UK) Ltd and Three (UK) Ltd installations are designed to be fully compliant with the public exposure guidelines established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines have the support of UK Government, the European Union and they also have the formal backing of the World Health Organisation. A certificate of ICNIRP compliance will be included within the planning submission. In fact, because of the very low power utilised by telecommunications sites the emissions will be many times lower than the ICNIRP threshold.

We would welcome your views (within 14 days of the date of this letter) before we finalise the proposal and submit the planning notification to the Local Planning Authority.

Yours sincerely,



Louis Freeman

Graduate Acquisition Surveyor

Email: louis-freeman@clarke-telecom.com

Tel: +44 (0) 7826 288781

(For and on behalf of EE (UK) Ltd and Three (UK) Ltd)

Louis Freeman

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To: head@bookwell.cumbria.sch.uk; admin@bookwell.cumbria.sch.uk
Subject: Pre-consultation - MBNL COP020 - Upgrade of Radio Base Station Installation
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Pre-consultation -
MBNL COP020...