SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Sellafield	Site Address:	Land at Sellafield Seascale Cumbria CA20 1RG
National Grid Reference:	303547, 504172		
Site Ref Number:	CS20716022 VF096637	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 explain why: None available		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	14/02/2022
Name of contact:	Duty Officer
Summary of outcome/Main issues raised: A site-specific pre-application consultation was issued to the LPA on the date given above. The submission included a written description of a draft proposal, a consultation plan and draft plans. In response the LPA issued an email on 30/03/2022 offering an initial thought on the proposal. The LPA have indicated the following points: • Consent will be required • Copeland Local Plan 2013-2028 policies ST1, ST2, T2, ENV5 and DM23 are applicable It has been considered appropriate to progress to a formal application stage and to address these points within the application.	

[1] Macro or Micro

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Annual area wide information to planning authority

Has annual area wide information been provided?	No
Summary issues raised: Cornerstone's commercial relationship with Vodafone Limited has changed, effectively increasing an independence to work with other companies in the deployment of mobile infrastructure. It means Cornerstone no longer have visibility of the operator's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance. Cornerstone aim to engage and work with the planning department at the earliest opportunity from when instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss our wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans, then please advise. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: The following were consulted on the same sate as the LPA: • Godforth and Seascale Ward Councillor			
Summary of outcome/main issues raised (include copies of relevant correspondence): N/A			

School/College

Location of site in relation to school/college (include name of school/college): N/A
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

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Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation

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: N/A		

Owner Notice / Developer's Notice

Copy of Notice enclosed?	Yes	No
Date served:	30/04/2022	

3. Proposed Development

The proposed site:
The subject site is located in an agricultural field to the north east of the Calder Hall Power Station, Sellafield. Other features of note include mature trees and pylon structures.

Enclose map showing the cell centre and adjoining cells if appropriate:
This can be supplied upon request. The intention is for the proposed base station site to provide new and up to date network services, including 5G, to those living, working and travelling in the local area. The operational context of the development has been explained in further detail below.

Type of Structure *(e.g. tower, mast, etc):*
Description: The proposal incorporates the following: • 30m lattice mast (Galvanised Grey) • 3No. antennas (RAL7035 Grey) • 4No. 600mm dishes (RAL7035 Grey) • 3No. cabinets (1No. 1000x470x1250mm; 2No. 1898x798x1698mm) (RAL6009 Green) • All ancillary development All apparatus has been limited to a minimum amount and dimension for the achievement of an efficient telecommunications service to be achieved.

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Overall Height:	
Height of existing building:	As per plans/above
Equipment Housing:	
Length:	As per plans/above
Width:	As per plans/above
Height:	As per plans/above
Materials:	
Tower/mast etc – type of material and external colour:	As per plans/above
Equipment housing – type of material and external colour:	As per plans/above

Reasons for choice of design, making reference to pre-application responses:

The design of any communications infrastructure is dictated primarily by operational requirements and secondly by the development's setting.

From an operational perspective, the operator must ensure the following when devising a final design solution for any site:

- Antennas need to be located at a height and specifically orientated to transmit effectively and efficiently without signal being impeded. They also need to be located to ensure ICNIRP compliance.
- Dish links (if required) achieve a direct line of site connection with other base station sites within the network; and
- GPS modules achieve a direct satellite link.

To achieve this, operators undertake a panoramic assessment to determine what is the minimum height for transmission equipment to be located in a context of local topography and clutter, such as manmade or natural features, and what antenna tilts and orientation are required to provide an effective solution.

Please be aware that modern network technologies operate in higher frequency bands than older technologies and therefore attenuation of the radio signal is naturally higher and more prone to the effects of clutter. This means that operators will normally require a higher structure to achieve the same coverage footprint.

It is also imperative that the supporting mast structure is structurally capable of accommodating the amount of transmission apparatus being proposed and the design is ICNIRP compliant.

In all cases the operator is committed to limiting the size and amount of apparatus to an operational minimum.

The proposed scheme is an upgrade of an established base station site and will provide multigenerational mobile communications network services.

- Design principles

  In light of the presence of lattice style pylon structures, this aesthetic has been replicated as far as possible in the subject proposal.

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- Colour Scheme

  The mast and transmission apparatus will all be coloured Grey, as this has been well established as the best colour for minimising impact upon a variety of landscapes and offers the best colour for limiting contrast against views that may be afforded against the predominantly grey British skyline. That said, the operator would be happy to colour the equipment to any preference of the Council which can be achieved via an amended set of plans.

Health and Safety - including ICNIRP compliance

International Commission on Non-Ionizing Radiation Protection Declaration has been attached.

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, the operator in this development:

- Vodafone Limited

Operate their network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.

As part of their 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.

4. Technical Justification

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

Coverage Requirement

In this instance the applicant is seeking to address the following specific coverage requirement:

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- The proposed development will provide improved multi-generational telecommunications coverage providing benefit to all those customers that live, work and travel in the locale; the proposed antennas will transmit the signal with the associated cabinetry and ancillary equipment servicing these antennas.

Existing coverage

In this instance the operator provides existing coverage to the wider locale via established base stations in the wider locale. However, the dynamic nature of technological advances in the telecommunications industry coupled with ever increasing demand from subscribers dictates a continual reinvestment programme on the part of licenced operators. As a result, and in line with their licence requirements, mobile operators are constantly developing their networks as well as refining and modernising their infrastructure.

5. Site Selection Process

Site	Name / Address	NGR	Reason for discounting
	N/A		

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

This proposal relates to the renewal of an expired planning consent issued under planning reference 4/17/2154/0F1

Land use planning designations:

The subject site is not within any restrictive landuse policy area

Additional relevant information (include planning policy and material considerations):

How Mobile Networks Operate

Cellular networks are made up of several individual cell areas, each of which has a base station within it. A good analogy for describing a cellular network is that of a patchwork quilt with each cell area being one of the many patches that are sewn together making up the network 'quilt'.

The base stations themselves will require a supporting structure, such as a mast or high building, to support antennas and dish whilst elevating these transmission elements above clutter, such as tall trees, buildings, or topography that could otherwise impede signal. Associated cabinets for housing radio equipment and power connections are also deployed to service the antennas. Base stations then receive and transmit to mobile devices using radio waves. The antennas operate like an aerosol spray with signal transmitted along a central orientation and dissipating with distance. The dishes operate on a direct line of sight basis, linking with dishes on other base station sites elsewhere within the wider network. The dish links also link the base station to a master control centre that manages the call handover process that occurs when a mobile user moves from one cell area to another. They also provide telemetric monitoring to ensure the site is working properly and offer remote maintenance.

In the early days of mobile communications, peripheral locations, high-level topographies and large-scale masts were often identified in order that transmission from a new base station could cover an expansive geographical area. However, whilst this approach was viable for early network generations, the number of mobile handset users has dramatically increased with time, as have the advancements in mobile technology itself. As a result, the cellular

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network construction and operational criteria have changed too. Because modern networks use higher frequencies with faster data rates whilst serving significantly increased numbers of mobile device users, typical network cell areas (i.e., the geographical area targeted for coverage for which a base station development provides a solution), are now smaller in their geographical expanse and tend to be directly proportionate to the number of users within it. They are also therefore greater in their number with base stations operating at a lower power output than their predecessors.

Mobile connectivity and service is required where customers live, work and play and good connectivity allows people to access a wide range of essential services including emailing; downloading apps; social media; helping with homework; researching local events, businesses or transport timetables; managing personal finances; shopping; contacting local authorities; arranging medical appointments; general business functions; and much, much more. 5G coverage and superfast mobile broadband data capacity demand will continue to increase exponentially with the introduction of IoT (Internet of Things), machine to machine connectivity, automated transport/industry and other 'smart' applications. To this end the existing shared infrastructure within the built environment has had to be reviewed and adapted as appropriate.

It is critical to understand that the UK's four Mobile Network Operators (MNOs) all utilise different technology spectrums to provide their mobile service. The spectrums the Operators utilise are allocated by Ofcom, as industry regulators on behalf of UK Government, through licence agreements with each of the individual MNOs. As such, each MNO must utilise the spectrum licenced to them. Each part of the RF spectrum has variations in terms of RF propagation. Therefore, the four individual MNO networks, and their sharing arrangements, cannot be compared directly and there will be variations in how all four networks are deployed and developed. For this reason, all MNOs who continue to be competitors but share base stations where possible, have a completely different network configuration they need to fit within and build 5G service around. Therefore, the network has to be built differently, with different antennas and equipment, to take account of those spectrum and licence variations and this will lead to necessary infrastructure variations cell to cell, depending on site specific demand, local constraints and requirement. As such, the various networks will have variations in how their infrastructure is deployed and developed.

Public Benefits

It is undeniable that mobile communication is now a key part of sustainable development and a vital tool in our personal lives and in all business and government operations. Indeed, the demand for faster and improved mobile connectivity continues to grow with modern society now expecting to be able to make use of mobile devices to their full potential where people live, work and travel. Each new generation of mobile communications technology has provided us with higher speed, better connection, and many more advanced features on our mobiles, and now with 5G, we can expect to experience an even more extensive range of telecommunication services. There is, therefore, currently a drive by the Government to ensure that all communities, both urban and rural, have access to the most up to date mobile technology, given the clear sustainability, social and economic benefits for doing so.

Good connectivity allows people to access a wide range of essential services and a further explanation on some of these key benefits is provided below:

- Economic benefits

    - Creating more productive and cost efficiencies for businesses
    - Businesses offering online services can extend their products to a broader audience
    - Local areas and businesses can benefit from tourists and visitors as hotels, attractions, and restaurants can be booked online from anywhere in the world
    - Business owners and services like doctors can provide a faster and more cost-effective service by offering both online appointments and ordering

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- Digital connectivity facilitates economic growth, something which the Government is keen to progress and promote
- 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security will also facilitate learning on the job procedures, thanks to technologies such as Augmented Reality (AR) goggles, which, for example, can give the likes of engineers real-time instructions on how to fix a machine on a production line.

- Social benefit

  - Mobile communications can help people to stay in touch wherever and whenever, which can help improve social wellbeing
  - Convenient access to online commerce or businesses
  - Contacting emergency services is easier, especially in remote areas
  - Giving the ability to manage our personal finances and information 24/7
  - Using a mobile wherever you go can provide better personal security
  - Having access to social networking sites and applications can keep people entertained with their lifestyles and interests
  - Access to real-time transport information or timetables
  - Smart meter reads for utilities such as gas or electric
  - Contacting local authorities
  - Promotion of smarter and productive ways of working. For example, working from home can help minimise commuting which can provide better work and home life balance

- Sustainability benefits

  - Facilitating remote access to services, education, and commerce, reducing the need to travel and in turn minimising carbon emissions.

- Health Benefit

  - Support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.
  - Patients across the country are now becoming accustomed to using remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.
  - 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

- Educational Benefit

  - Facilitates access to educational establishment databases or booking systems for securing places for the likes of school dinners, field trips, extra-curricular activities, student/teacher reviews, etc.
  - Provides access to school/college/university apps for setting and submitting homework/coursework, ensuring news and notifications are delivered efficiently, and for parent/student/teacher interactions.
  - The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

Who will be affected by a lack of coverage?

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In considering the merits of the subject application, it is important to give due cognisance to those that would be impacted upon if the current network requirement for Vodafone Limited was not to be addressed. The following paragraphs will provide some context on this issue using recent statistics and data.

According to approximate figures produced by www.which.co.uk in an article dated 17 May 2021 and titled 'Who are the biggest UK mobile networks'[2], Vodafone Limited, (an MNO – Mobile Network Operators), and their respective Mobile Virtual Network Operators (i.e., Asda Mobile, Lebara and Voxi for Vodafone Limited), make up approximately 21% of mobile device users in the UK.

It is therefore fair to assume that a similar percentage of the mobile device users in the local area will be relying on the operators in question to maintain and provide uptodate mobile network coverage at the earliest opportunity.

How people use their mobile devices

It is also important to evaluate the proposal within a context of how people in the UK are using mobile communications networks and industry trends, especially those experienced during the peaks of the Covid-19 pandemic. We would therefore refer the reader to 'Online Nation 2020'[3] which has been produced by Ofcom, June 2020.

The report found that in relation to the increasing importance of mobile connectivity:

- 71% of all measured time spent online was via smartphones;
- 35% of internet users accessed the internet only on mobile devices (smartphone or tablet)

The report also confirms that "…87% of the UK adult population use the internet…" and, under the sub-heading 'Smartphones are the most popular device for accessing the internet', state that:

> *"Smartphones are cited as the most important device for accessing the internet at home or elsewhere among all adults 16+ (60%)."*

Reinforcing the importance of mobile connectivity during the pandemic, the Online Nation report included the sub-heading 'Covid-19 impact: time spent online reaches record levels' which states:

> *"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.*
>
> *In April 2020, the reach of education (+3 percentage points), health (+5pp) and government (+5pp) sites had all grown since January…*
>
> *… between January and April 2020; Houseparty increased from 175,000 to 4 million; Zoom reached 13 million adult internet users in April, up from 659,000 in January."*

The report also includes the sub-heading 'Most internet users use online messaging and calling service and use increased during the coronavirus pandemic' which states that:

[2] https://www.which.co.uk/reviews/mobile-phone-providers/article/best-mobile-networks-overview-amhDx1F0z41t#who-are-the-biggest-uk-mobile-networks

[3] https://www.ofcom.org.uk/__data/assets/pdf_file/0027/196407/online-nation-2020-report.pdf

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> *"In February 2020, 73% of UK adult internet users used online text messages, 54% use online voice calls, 35% use video calls and 55% use emails, at least weekly. Nine in ten adult internet users used any of those four services at least weekly.*
>
> *Until early this 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.*
>
> *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. Our research suggests that 7% of adult internet users used video calling for the first time as a result of the coronavirus pandemic."*

It is clear from the above that reliance on mobile connectivity was increasing before the pandemic and has since increased. It is also fair to assume that increased use of and expectation for reliable mobile digital connectivity will see this upward trend continue given a widespread societal shift to a mix of previously normal and home-working practices and also face-to-face and remote-learning in the educational sectors.

The reader will also appreciate that those living in lower income households are less likely to have fixed line broadband, tending instead to be reliant on mobile connectivity for online access. It is they who will find reliable uptodate mobile digital connectivity an essential service, rather than a luxury, for all sorts of reasons including working from home, education, accessing services online, shopping online, and keeping in touch with friends and family amongst other things. These households will be further disadvantaged if the current infrastructural need is not met.

Another important factor to consider is the impact a lack of modern network services will have upon local businesses, including those working from home and recent start-ups. As an example, Ofcom in its Online Nation 2020 report states that a shift in consumer behaviour regarding business-focused video calling services has occurred since lockdown, with these being '…perceived to provide a better replacement for face-to-face interaction, whereas previously it was mainly used to communicate with friends or family abroad or far away.' Those continuing to work from home in the target coverage area, and those businesses or educational establishment continuing to operate without face-to-face contact and using the operator's network, or via their MVNOs, will all benefit from the provision of improved network services, and this is recognised as an essential part of the recovery of the economy.

It is also worth noting that in October 2020, the Centre for Policy Studies. Published a report titled 'Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution'[4] in which it indicated that the next few years were critical for economic growth and that delays to the future rollout of 5G could cost the country tens of billions of pounds in lost economic output. The report also suggests that if delays continue at their current rate, by 2027, over 11 million households and businesses could be missing out on vital digital connectivity. Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities. However, the Report suggests that, without reform to existing legislation, millions of households and businesses will suffer.

The Report also includes the following statements from its author, Alex Jackman, a former digital adviser to the Government:

> *"Digital networks and the services they support have underpinned our resilience to Covid-19 and they will drive our recovery. By expanding them, we deliver not only immediate benefits but also the essential foundation stone for 5G. This is no time for the government to be passive on the deployment environment - the difference between the UK as a 5G pioneer and ceding leadership to others is as much as £173bn.*

[4] https://www.cps.org.uk/research/upwardly-mobile/

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"Productivity gains to business, equality gains for regions and economic gains for the country are only as achievable as the networks we can access."

Emerging from the Covid-19 pandemic and its context with the provision of mobile network services

One must consider the operational context of modern communications in the management of the pandemic and the long-term implications it will have on the way we do business, socialise and function. In 2020 the Department for Digital, Culture, Media and Sport published Guidance[5] on telecommunications infrastructure deployment in England, stating that:

"Government recognises the ongoing importance of the telecommunications industry at this critical time.

Now, more than ever, the country is reliant on fixed line and mobile communications networks. Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak."

In instances when students/pupils have been unable to attend school/college due to lockdowns, closures and isolation requirements, mobile communications have been a key facilitator in remote learning with many schools and colleges having now adopted the use of bespoke apps or the likes of 'seesaw' or 'google classrooms' for teachers, students and parents/guardians to interact on a daily basis. Such apps allow schools/colleges to record what is happening, set and receive homework/coursework, and to notify parents of important information about operations, such as Covid-19 regulations. Whilst these apps can be used on many devices and work with both Wi-Fi and mobile communications networks connections, the dependence upon the latter is undoubtedly significant given the ease with which one can do so.

The Department have also published a further press release entitled "Industry and Government Joint Statement on Telecommunications Support for the NHS'[6] which highlights the NHS need for broadband and mobile services now that many healthcare services (e.g., hospital outpatient appointments) are being provided remotely and which outlines a new set of commitments including:

- Ensuring that hospitals have the connectivity they need;
- Enabling front line staff and clinicians to work remotely without service limitations; and
- Offering generous data allowances for their vulnerable mobile customers, so that patients have sufficient data to partake in video consultations.

One must also recognise the fact that mobile connectivity is the main means by which patients and the more vulnerable persons in our society can stay in touch with friends and family members who are unable to visit them in hospital, in care, in isolation or when shielding.

Following on from the above, it is worth noting that the then Digital Infrastructure Minister, Matt Warman MP, recently gave a Keynote Speech at Connected Britain 2020[7], in September of 2020, and spoke about ongoing work by the government and telecommunications industry to boost the UK's world class digital connectivity. In his opening paragraphs, he stated thanked the telecommunications industry as a whole, stating:

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[5] https://www.gov.uk/guidance/covid-19-guidance-for-telecommunications-infrastructure-deployment-in-england

[6] https://www.gov.uk/government/news/industry-and-government-joint-statement-on-telecommunications-support-for-the-nhs

[7] https://www.gov.uk/government/speeches/matt-warmans-keynote-speech-at-connected-britain-2020

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> *"You have kept school children connected with their teachers, allowed isolated grandparents to speak to their grandchildren, and enabled great British businesses to power the economy through these difficult times."*

Before going on to suggest that:

> *"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 Minister went on to refer to 5G as 'game changing technology' and referenced its endless opportunities before concluding that

> *"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"*

National Planning Policy Framework (NPPF) 2021[8]

The NPPF outlines the Government's strategies for economic, environmental and social planning policy in England providing a set of objectives that have been designed to foster the delivery of sustainable development, not to hinder or prevent development. Local planning authorities are directed to approach planning decisions positively and to attach significant weight to the benefits of economic growth. The NPPF also states that where a development plan is absent, silent or out of date then permission should be granted unless the adverse impact of doing so would significantly outweigh the benefits when assessed against the NPPF.

The NPPF supersedes all Planning Policy Statements and Planning Policy Guidance Notes, including the telecoms specific PPG 8.

Section 10 of the NPPF is entitled "Supporting High Quality Communications" and continues the vein of the preceding NPPF's Section 5, reiterating 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
- Upgrades will be necessary in time

And advocating that:

- Site/mast sharing potential should be investigated
- Sites should be carefully designed using a minimum size and scale of apparatus and disguises where necessary

[8] https://www.gov.uk/government/publications/national-planning-policy-framework--2

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Section 10 goes on to confirm that developers must provide evidence in relation to their site selection process that confirms that every effort has been made to identify the best available site option. It also places an emphasis on the fact that LPAs must determine applications for communications infrastructure on planning grounds alone.

Other relevant points from the NPPF

- Section 2 'Achieving Sustainable Development' continues to promote sustainable development via the support for economic, social and environmental objectives

- Section 4 'Decision Making' confirms the need for LPAs to approach decisions on proposed developments in a positive and proactive way, seeking to approve applications for sustainable development where possible.

- Section 6 'Building a strong, competitive economy' outlines the need to support economic growth, highlighting the need to appreciate specific locational requirements; a matter that is which is very relevant to communications development which is based upon very specific geographical necessities. With modern technologies, coverage requirements must be addressed from within or extremely close to the target area.

- Section 15 'Conserving and enhancing the natural environment' confirms the need to distinguish between international, national and locally designated sites confirming that *'…great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.'*

- Section 16 'Conserving and enhancing the historic environment' confirms the need to consider the potential impact of development upon historic assets, advocating that any proposal that does result in harm to a designated heritage asset must have clear and convincing justification. Importantly it also confirms where a development proposal leads to less than substantial harm, then this harm must be weighed up against the public benefits of the proposal.

Code of Practice for Wireless Network Development in England[1]

The Code of Best Practice 2016 has now been replaced with this document which provides guidance to Code Operators (referred to as 'operators' throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The aim of the Code of Practice is to support the government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

It is also important to note that, although led by the Department for Digital, Culture, Media and Sport (DCMS), this Code of Practice has been developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes.

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1057999/Code_of_practice_for_wireless_network_development_in_England.pdf

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The document outlines the Legal and Policy frameworks within which the document has been produced and reiterates the following:

> *"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.*
>
> *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."*
>
> Paragraphs 8 and 9

It is also important to note that the Code states that:

> *Section 10 of the NPPF sets out the planning policies for communications development in England, and states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. The NPPF also sets out that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G). Other sections of the NPPF set out how these policies should be balanced with other considerations, including conserving and enhancing the natural environment and historic environment."*
>
> Paragraph 15

With regards to how wireless networks function, and with specific reference to 5G, the Code states that:

> *"Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications.*
>
> Paragraph 17

The Code also outlines its 'Principles and Commitment' as follows:

Operators should develop their networks and install wireless infrastructure according to the following principles and commitments:

- *"Site sharing and use of existing infrastructure: make use of existing structures, sites and masts wherever possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and sites 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.*
- *Consultation with local planning authorities, local communities and other stakeholders: participate in dialogue with local planning authorities, along with other relevant stakeholders such as the highways authorities, Area of Outstanding Natural Beauty bodies, Historic England, and Natural England, including pre-application discussions, where appropriate. Maintain clear procedures, and high-quality communication and consultation with local communities and other interested parties. Operators should agree community engagement with local planning authorities and share information as appropriate (see pre-application consultation with local communities below).*
- *Standardised and high-quality approach to planning applications, and the notification procedure: provide standardised supporting documentation for planning applications (where appropriate) within*

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the context of national and local requirements. Ensure planning submissions are of high-quality and provide the necessary evidence to support the application (as per the NPPF).

- *Prompt responses to enquiries: respond to complaints and enquiries within a timely manner (see Review and Enquiries section below).*
- *Siting and Design: wireless infrastructure should be deployed in accordance with the guidance set out within this Code of Practice. Where appropriate, equipment should comply with the principles set out in the NPPF and consider any local planning policies, including any local and national design codes. When located in protected landscapes and other designated land, the sensitive nature of these areas must be considered.*
- *Removal of redundant equipment and site restoration: ensure that when infrastructure is upgraded, any equipment that is made redundant by the upgrade, such as brackets, is removed to benefit the local environment. Where a whole site is no longer in use, the site should be restored to its original state.*
- *Compliance with guidance laid out in the International Commission on NonIonizing Radiation Protection (ICNIRP) public exposure levels guidance: as required by spectrum licences, comply with international guidelines for limiting exposure to electromagnetic fields (EMF) - including, as set out in the NPPF, providing a statement that self-certifies that ICNIRP guidelines will be met with all applications (see Annex C)."*

Paragraph 18

Equally importantly, the new Code outlines the role of the Local Planning Authority stating:

"Local planning authorities should support the deployment of digital infrastructure by:

- *Incentivising connectivity: support the expansion of telecommunications networks, and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.*
- *Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.*
- *Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.*

Information and communication: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives)."

Local Plan

The Copeland Local Plan[9] is currently made up of the following statutory planning documents which are used as the basis for determining planning applications:

- Copeland Local Plan 2013-2028 Core Strategy and Development Management Policies
- Copeland Local Plan 2013-2028 Proposals Map and Copeland Local Plan 2001-2016 Saved Policies
- Copeland Local Plan 2013-2028 Interactive Proposals Map

The following policies of the Copeland Local Plan 2013 – 2028 have been considered relevant to this proposal by the LPA at pre-app stage:

[9] https://www.copeland.gov.uk/content/copeland-local-plan

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

We would also take this opportunity to remind the decision maker that this application relates to the renewal of an expired consent, as per planning reference 4/17/2154/0F1.

It is also important to note that this is a niche infrastructural development proposal, and it would be unreasonable to expect it to adhere strictly to more general development policy criteria. Instead, such policies must be considered in a weighted manner with the existing local plan policy that is telecommunications specific and NPPF taking precedence.

Decision Makers must also not forget to weigh the impact of telecommunications developments against the many significant social, economic and sustainability benefits it brings.

Government Ambition and Legislative Reforms

One should consider the subject proposal in a wider context of current Government guidance and ambition which clearly recognises the benefits that modern communications networks bring. The reader will also be aware that amended legislation has been introduced on 04 April 2022 with the following being brought into force:

- The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2022[10]

Government ambition and recognition for the benefits that modern communications networks bring is also clearly evident in:

- The Electronic Communications Code (the Code) 2017[11]
  The 2017 amendment make it easier for network operators to install and maintain apparatus such as phone masts, exchanges and cabinets on public and private land with Part 4, Paragraph 20 providing a mechanism for the courts to impose terms of occupation on a landowner and the Operator.

Planning Summary

A summary as to why the subject proposal adheres to all relevant policy criteria is outlined below:

- Operational Requirement
  There is a clear operational need for the development. The subject proposal will result in improved and modern network services from this site, allowing customers who are residents, businesses and visitors in the locale to access the many social and economic benefits associated with modern communications network services.

- Siting
  The siting of any new base station development is directly linked to operational need. In this instance, the operator has and expired consent for a similar base station development on site. The subject site, which is located in an agricultural field but set in a context of the adjacent power station and nearby pylon structures, is not subject to any restrictive planning policy designations.

[10] https://www.legislation.gov.uk/uksi/2022/278/contents/made
[11] https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/policy/electronic-comm-code

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- Design
  Similar to siting requirements, the design of any new base station development is directly linked to operational need. It also has to be tailored to the bespoke nature of the site in question, i.e., with consideration in a context of existing apparatus, roofscape, topography, planning policy and other local sensitivities, and the design must be structurally capable of accommodating the necessary transmission apparatus. Following the nomination of this historically consented site for use, a well-considered design process has been implemented with the applicant having to balance technical requirements including operational, wind loading and structural calculations, with the minimisation of visual impact. A replication of the design principles of the consented base station have been incorporated as far as is reasonably possible and a minimum amount and size of apparatus has been proposed.

- Colour scheme
  The proposed mast and transmission apparatus will be grey in colour. This has been deemed most appropriate as this will allow best absorption against any views that may be afforded against the predominantly grey British skyline and features of the wider landscape.

- Impact upon trees/vegetation
  No trees will be impacted upon.

- Flooding
  A flood risk assessment is not deemed to be necessary.

- Cumulative Impact
  There are no other base station located in close proximity so cumulative impact is not likely to be an issue.

- Impact upon built heritage
  The development is well removed from any built heritage assets in the wider locale.

- Impact upon natural heritage
  The development is well removed from any natural heritage assets in the wider area.

- Impact upon residential amenity
  The site is well-removed from nearby residences, so impact upon residential amenity is not an issue.

- Impact upon general amenity
  It is almost impossible for telecommunications infrastructural development to physically enhance its setting. Indeed, all that can be done is to seek to minimise impact as far as is operationally possible through sensitive siting and design practices, as has been the case in this instance. Although a new base station is being deployed, the reader will note from the above that this development relates to the renewal and slight amendment to an historical consent that has expired. The development principles reflect that of the previous proposal and a minimum amount and size of apparatus are being proposed with an appropriate colour scheme having been incorporated. The development will be visible from certain vistas, but it is important to consider the level of sensitivity and context associated with such views. One will appreciate that the adjacent power station dominates the landscape with a number of pylon structures also being present. Impact upon general amenity is considered to be insignificant.

- Benefit
  As indicated, the proposed critical infrastructure will allow local residents, businesses and visitors in the locale to access the many social and economic benefits associated with modern communications network services. High quality and reliable communications infrastructure are essential for economic growth and

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social well-being and the demand for mobile data in the UK is increasing rapidly as households and businesses become increasingly reliant on mobile connectivity. The infrastructure must therefore be in place to ensure supply does not become a constraint on future demand. There should be no doubt that the Government fully supports the development high quality communications infrastructure and decision makers must appreciate that the NPPF advocates that local planning authorities should also support the expansion of electronic communications networks where impact is deemed to be acceptable or outweighed by benefit.

- Weighing up Harm versus Benefit
  Introducing any new infrastructural element into a rural landscape will undoubtedly result in some degree of visual impact. However, it is important that consideration be given to all material planning considerations when weighing up the acceptability of the proposal. Telecommunications development is now an accepted infrastructural element in modern society with the presence of base stations being commonplace features throughout all manner of landscapes and planning sensitivities. It is no longer an 'alien' feature, and one must also recognise the fact that mobile telecommunications base stations, like street lighting, signage, bus stops, gas, electricity, water and any other utilities/infrastructural elements, are now an integral piece of infrastructure upon which, more so now than ever, our society is heavily dependent on day-to-day basis.

  It is undeniable that there are extensive economic, social and sustainability benefits associated with modern communications networks, as have been expanded upon above. These many benefits offer circumstances which should be considered more than sufficient to outweigh any limited impact that may occur in this instance. However, an even greater emphasis has been thrust upon such networks by the recent Covid-19 pandemic, which has resulted in a significant and widespread societal shift to remote working and reliance upon both online services and social media interaction for both business and personal use.

  Although some degree of impact will occur, it is considered to be both acceptable and outweighed by the many benefits of modern communications systems. One must appreciate after all that a failure to achieve a successful modern network coverage solution will be to the detriment of all the operators' business and personal customers who live, work and travel in this area.

- Photomontages
  We would be happy to commission photomontages from viewpoints agreed with the LPA to assist in considering the planning merit of this application. Please do not hesitate to contact us if this additional is required.

- Removal of redundant apparatus
  The operator would be happy to remove any redundant apparatus and reinstate the land.

- Health
  An ICNIRP Certificate has been supplied. As such, the issue of health is not a material planning consideration. However, for the benefit of further information on this matter, we would refer the reader to the additional supporting information that has been submitted with this application.

We trust that the above and enclosed information is to your satisfaction and would be happy to expand upon this or to discuss any aspect of this proposal as required.

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Confirmation that submitted drawings have been checked for accuracy for an on behalf of Cornerstone

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Signed:		Date:	30/04/2022
Position:	Consultant Planner (on behalf of Cornerstone)		

In the first instance, all correspondence should be directed to the agent.

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