

**SUPPLEMENTARY INFORMATION
(INCLUDING DESIGN & ACCESS STATEMENT/HERITAGE STATEMENT)**

1. Site Details

Site Name:	Parish Church Egremont	Site Address:	St Mary and St Michael Church, South Street, Egremont, Cumbria, CA22 2AW
National Grid Reference:	E: 301100 N: 510570		
Site Ref Number:	COP020	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

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: Upgrade of an existing site.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: Upgrade of an existing site.		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	13/04/2023 & 24/04/2023
Name of contact:	Chloe Unsworth

¹ Macro or Micro

Summary of outcome/Main issues raised:

A pre-application consultation letter and copy of the proposal drawings were sent to the Local Planning Authority by email on 13/04/2023.

A response was received from Chloe Unsworth on 24/04/2023, outlining the relevant policies and confirming:

“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.”

To confirm, the proposed works do not require any drilling into the masonry. The replacement antennas will be located on upgraded support poles which will be fixed to existing clamps and plates. The replacement GRP louvres will slot into the existing louvre locations. The proposed GPS node will be mounted off an antenna support pole and will sit on the exterior of the building via a slot in the louvres. The proposed equipment cabinets will be bolted to the existing steel grillage floor within the tower.

Annual area wide information to planning authority

Has annual area wide information been provided?	N/A
If no explain why:	
Summary issues raised:	
The relevant information is being collated and will be distributed accordingly in due course.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:			
A pre-application consultation letter and copy of the proposal drawings were sent to the Egremont ward councillor (Councillor Sam Pollen) and Egremont Town Council by email, on 13/04/2023.			
Summary of outcome/main issues raised (include copies of relevant correspondence):			
No responses have been received to date.			

School/College

<p>Location of site in relation to school/college (include name of school/college):</p> <p>Bookwell Primary School, Bookwell, Egremont, Cumbria, CA22 2LT</p>
<p>Outline of consultation carried out with school/college (include evidence of consultation):</p> <p>A pre-application consultation letter and copy of the proposal drawings were sent to the school by email, on 13/04/2023.</p>
<p>Summary of outcome/main issues raised (include copies of main correspondence):</p> <p>No responses received to date.</p>

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

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
<p>Details of response:</p> <p>The site is not located within any known civil safeguarding area. In addition this is an application for full planning permission/Listed Building consent.</p>		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	Application for Full Planning/Listed Building Consent. Notice sent to owner by email on 28/04/2023.	

3. Proposed Development

The proposed site:

Background

MBNL undertakes the management and network deployment of telecommunications sites on behalf of both EE (UK) Ltd and Hutchison 3G UK Ltd (H3G).

The Government is committed to supporting investment in high-quality, reliable digital connectivity so that communities can benefit from faster economic growth and greater social inclusion. It is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities.

As part of MBNL and H3G's continued network improvement program, there is a specific requirement to upgrade the existing installation at this location.

The site is an established radio base station located within the tower at St Mary and St Michael Church, South Street, Egremont.

The area surrounding the site is predominantly residential in nature. The site is located on the southern edge of Egremont town centre, which hosts a mix of uses including leisure, retail, healthcare and food/drink establishments.

The church is a Grade II listed building and falls within Egremont Conservation Area.

The MBNL equipment in the church has been in situ for approximately 20 years.

The proposal

This application relates to the installation of a GPS node externally, which will be fixed to an upgraded antenna support pole. The bracket holding the GPS will exit the church tower through a slot in the upgraded louvres in order to sit externally. The GPS needs to be located externally to achieve a clear line of sight with the sky, in order to operate effectively. The proposed GPS node is very small (approximately the size of a tennis ball) and, given its height above ground level at 16.15m, it is not considered that it will be overly noticeable in views of the site from public vantage points at ground level.

The application also proposes internal works, which comprise of the removal and replacement of 3 no. antennas, to be located on upgraded support poles, the removal and replacement of the existing GRP louvres, the removal and replacement of existing timber backboards with mesh, the installation of 1 no. equipment cabinet and 1 no. ERS rack to be bolted to the existing steel grillage floor within the existing equipment room within the church tower, and the installation of ancillary equipment, including MHAs and active routes, which will be fixed to an existing cable tray in the equipment room.

There is no requirement for any new drilling of equipment to the material of the listed building. The upgraded antenna support poles will be fixed to existing clamps and steel plates which are already in situ. The mesh will be fixed to the existing timber frames once the timber boards are removed. The proposed cabinet and ERS rack will be bolted to an existing steel grillage floor which is already in situ.

Enclose map showing the cell centre and adjoining cells if appropriate:

The proposal is for the installation of a GPS node. The GPS node requires a clear Line of Sight and as such it must be located externally.

The internal works comprise of the replacement of 3 no. existing antennas with 3 no. upgraded antennas and the installation of 1 no. new cabinet and 1 no. rack, and ancillary works thereto.

These minimal amendments will ensure high quality customer experience is maintained as demands on the network increase.

Type of Structure (e.g. tower, mast, etc): Antennas and equipment located within church tower

Description:

The installation of 1 no. GPS node, to be located externally mounted off an upgraded antenna support pole, internal works, and ancillary development thereto.

Overall Height: N/A

Height of existing building (where applicable):	21.86 Metres (top of church tower)
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Equipment Housing:

Length:	N/A – located internally
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Width:	N/A – located internally
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Height:	N/A – located internally
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Materials (as applicable):

Tower/mast etc – type of material and external colour:	N/A – located internally. GPS node
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Equipment housing – type of material and external colour:	N/A – located internally fixed to existing steel grillage floor within church tower
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Reasons for choice of design, making reference to pre-application responses:

The GPS node is required to be located externally in order to achieve a clear Line of Sight and operate efficiently. The significance of the heritage asset has been fully appreciated and it is proposed to install the GPS node on a bracket off an upgraded support pole to avoid the need for any drilling or fixing to the exterior of the church tower. The bracket will exit the tower through a slot in the louvres, allowing the GPS to achieve the Line of Sight to the sky that it requires.

All other aspects of the proposed works to take place internally also fully take into account the importance of preserving the material of the listed building. As explained above, there is no requirement for any new drilling of equipment to the material of the listed building. The upgraded antenna support poles will be fixed to existing clamps and steel plates which are already in situ. The mesh will be fixed to the existing timber frames once the timber boards are removed. The proposed cabinet and ERS rack will be bolted to an existing steel grillage floor which is already in situ. Associated cabling will be run along the existing cable trays, and ancillary equipment (the MHAs and active routers) will also be mounted to the existing cable trays.

As confirmed in the Local Planning Authority's response to the pre-application consultation, the proposal will upgrade an existing site, which is fully in line with NPPF. No part of the proposed works will exceed the height of the church. The majority of works are internal. The only aspect of the works which is external is the installation of the GPS node and the replacement of the louvres. The replacement louvres will match the existing. The GPS node is small (approximately the size of a tennis ball) and given it's height above ground level, at 16.15m, it is not considered that it will be overly noticeable from public vantage points at ground level.

Health and Safety - including ICNIRP compliance

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, Hutchison 3G UK Limited operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision

As part of Hutchison 3G UK Limited's network, the radio base station that is the subject of this application will be configured to operate in this way.

All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.

The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.

4. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

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

The GPS node is used to model a Global Positioning Sensor (GPS) which can obtain information about its absolute position from the controller program.

In order to do so, GPS nodes must have a clear line of sight. They must be in a clear view without any physical obstructions such as trees or buildings which would reduce or disrupt the sensor.

In this case, it is therefore necessary to locate the GPS node externally. The GPS node will be located on a new bracket fixed to the proposed upgraded antenna on the rooftop, which will allow it to achieve the clear Line of Sight required.

GPS nodes do not have coverage plots as they operate on a point-to-point basis.

The replacement antennas will improve capacity on the existing network, as more people require mobile access for phone calls and mobile internet at once. Increasing the capacity of the network will ensure more people are able to use their phones at the same time whilst reducing the risk of calls dropping, internet buffering etc. Improvements to capacity are not shown on coverage plots.

5. Site Selection Process

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
N/A	N/A	N/A	N/A

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

The proposal is for the upgrade of an existing site, comprising of the installation of a GPS node, internal works, and ancillary development thereto.

As the proposal is for the upgrade of an existing site, which is sequentially the best option in line with NPPF, and the proposed scheme is required specifically at this existing site, no alternative sites were considered.

Land use planning designations:

Please see below.

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

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

It is not necessary to quote extensively from this document but the following points are highlighted.

National Planning Policy Framework (July 2021)

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The NPPF was updated in July 2021, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions.

The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 114 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of *reliable* communications infrastructure for both economic growth *and social well-being*.

The NPPF continues to support the expansion of electronic communications networks at paragraph 114. It notes that policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF makes reference to 5G:

'Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)...

With the above in mind, the Government is already forward thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

Paragraph 115 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 118 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 38 it states that:

'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including...permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 81 states:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴²...

Footnote 42 of the NPPF states:

'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'.

The NPPF provides guidance on proposals affecting heritage assets in Section 16. Paragraph 194 states that "in determining applications, local planning authorities should require an

applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."

Paragraph 195 goes on to state that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset).

The NPPF goes on to provide guidance on considering the potential impacts of development on heritage assets. Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 202 retains advice provided in the 2012 version of NPPF relating to the degree of harm. It states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Public benefits are defined within the NPPF and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Code of Practice for Wireless Network Development in England

The Code of Practice 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.

The Code of Practice covers all forms of wireless infrastructure development, including mobile masts and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Best

Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

The CoP sets out the legal and policy framework for the delivery of wireless infrastructure development.

Paragraph 8 of the revised Code acknowledges that connectivity is vital to enable people to stay connected and that fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code continues to acknowledge that as the demand for mobile data in the United Kingdom is increasing rapidly, and that it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.

The Government recognises the role of Planning in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity.

Paragraph 13 of the Code continues to echo the NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth. More specifically that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G) in order to support economic growth across the country.

The CoP sets out 'How wireless networks function.

Para. 16 states "Cellular wireless networks use base stations to provide an area of radio coverage. Wireless technology uses the radio spectrum to broadcast radio waves between base stations and devices. Different radio frequencies have different characteristics which, along with the density of cell site locations, affect the extent of coverage and how much data can be carried over the network. Depending on the radio frequencies used, base stations can deliver coverage over a wide area or provide extra network capacity in areas where there is a high demand for network bandwidth".

Para. 17 sets out 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".

The CoP establishes 'Principles and commitments' by which operators should develop their networks and that Local Planning Authorities should demonstrate their support by.

Para. 18 states “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 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 Non-ionizing 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 19 states that Local Planning Authorities should demonstrate their support 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)”.

The added emphasis on support from Local Planning Authorities in the deployment in digital infrastructure is even more evident in the revised CoP. The CoP recognises the importance of collaboration and partnership to help drive network coverage across the country. It goes on to state that *‘In all instances, it is important for all parties involved in the process to take a positive approach to consultation and engagement’*.

Siting and Design Principles

The government's objective is to deliver high quality, reliable wireless infrastructure whilst ensuring the impact of new network development is kept to a minimum. The siting and design of wireless network infrastructure is central to achieving this. The CoP acknowledges that *‘good siting and design principles should apply to all wireless network development and take into account any site specific considerations and context. Both can create better places in which to live and work and help make development acceptable to communities’*.

The Code provides guidance on siting and appearance principles. It sets out several design principles in respect of telecommunications development and acknowledges that the options for design used by an operator will be affected by site conditions including requirements to link the site to the network, landscape features and coverage and capacity requirements. The guidance includes at Para. 22 *‘the choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible’*.

Para. 23 confirms that there should be a **‘presumption in favour of facilitating sustainable network development’** and, as such, operators and local planning authorities, as well as all other bodies involved in the deployment process, should work together to ensure connectivity needs are met and find viable solutions to deployment issues (emphasis added).

Paragraphs 24 - 27 sets out general siting and site selection principles which Operators should consider. The CoP acknowledges at Para. 24 that *‘Operators use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites*

for 2G, 3G, 4G and now 5G. Once an operator has identified a requirement for a new cell site, a suitable site needs to be found. Elements that make a site favourable include: having existing or ready access to a power supply, access to fibre optic cables, vehicular access, and, other buildings and development which may provide a level of existing screening. Operators will typically look to upgrade existing infrastructure prior to considering a new deployment, in particular for initial 5G deployment'.

Para 25 notes that 'When selecting sites for mobile infrastructure, operators should examine local plans and designations for the area, as well as carrying out an in-person site search to identify potential options which meet their requirements. Operators should follow these general siting and site selection principles:

- Installation on existing buildings and structures;
- Erecting new ground based masts;
- Camouflaging or disguising equipment where appropriate;
- Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage); and
- Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator)'.

Para. 26 highlights that the installation of all wireless infrastructure requires a balanced approach between the technical needs and constraints of the proposed site and the potential impact of the development. The three key technical and operational considerations for installation sites are:

- **Coverage:** wireless infrastructure needs to provide an appropriate level of coverage over the intended geographical area. This involves ensuring that antennas are elevated sufficiently (often via masts) to provide clear lines of sight for signals.
- **Capacity:** where existing network infrastructure can no longer meet the demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand. This is more likely to be required in densely populated areas or areas of high footfall.
- **Backhaul:** the radio access network requires a connection to the core network. Backhaul is sometimes provided by a microwave link, which requires a clear line of sight between the two ends of the link.

Para 27 requires that Local Planning Authorities consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. Para. 27 further considers that in general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations

In respect of 'Design', the CoP at Para 28 acknowledges that the siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact including

- **Protecting visual amenity**
- **Mitigating visual impacts**

Para. 29 acknowledges that these factors along with location and the coverage and capacity requirements can influence the type of infrastructure structure that is deployed and requires that *'planning authorities should be aware of these constraints when considering proposals. In particular:*

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.*
- *In rural areas, base stations often need to cover wider geographic areas. Operators may need to use tall masts or lattice towers to provide the required coverage. The location of masts can sometimes be dictated by access to transmission links back to the operator's main network and proximity to a power supply. Coverage in some areas can be limited because of the geography, topography and terrain'.*

The CoP establishes radio equipment housing (cabinets) principles. The CoP at Para. 30 states that *"cabinets protect radio transmitters and receivers, provide the power source for mobile equipment, and are connected to antennas via cables. Equipment cabinets are likely to be needed at most sites. The cabinets must be of sufficient size to facilitate hosting various operating equipment whilst also allowing air circulation to reduce the potential for overheating"*. The CoP establishes the planning and visual considerations for siting radio housing. These include:

- Colouring
- Siting on highways and footways:
- Highway safety:
- Listed buildings/ scheduled monuments and Conservation Areas:
- Access
- Trees

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under

the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

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.

Copeland Borough Council Core Strategy and Development Management Policies DPD

The Copeland Borough Council Core Strategy and Development Management Policies DPD was adopted in December 2013. It forms part of the Council's development plan and sets out the planning policies under which development control decisions will be taken.

The Vision for Copeland states:

"By 2028, Copeland will be an economically and socially sustainable, well-connected and environmentally friendly responsible place of choice.

Economically sustainable: a place that boasts prosperous towns and vibrant villages, a highly skilled workforce and a varied and sustainable economic base that builds on opportunities, including those presented by the low-carbon and renewable energy sectors, knowledge-based industries and tourist attractions;

Socially sustainable: a place that meets the needs of the whole community, where geography is not a barrier to achievement, and where housing quality and availability, social infrastructure, health and well-being, equality and social mobility are improved;

Well-connected: a place that has enhanced transport networks providing improved access to sustainable modes of transport, both within and between its key settlements and out towards neighbouring areas;

Environmentally responsible: a place that adapts to climate change and minimises its carbon footprint, makes the most of its unique coastal location and abundant natural resources whilst protecting and enhancing its green infrastructure, landscapes, heritage and biodiversity."

The DPD sets out a number of Strategic Objectives, of which the following are relevant to the proposal:

"Strategic Objective 11

Reduce the need to travel by supporting improved telephone and rural broadband access."

"Strategic Objective 17

Protect and enhance the many places and buildings of historical, cultural and archaeological importance and their settings."

Policy ST1 of the DPD outlines the Strategic Development Principles for the borough. Of these, the following are relevant:

"A. iv) Support development that provides or contributes to the Borough's social and community infrastructure enabling everyone to have good access to jobs, shops, services and recreational and sports facilities.

B. i) Encourage development that minimises carbon emissions, maximises energy efficiency and helps us to adapt to the effects of climate change.

B. vi) Minimise the need to travel, support the provision of sustainable transport infrastructure and measures that encourage its use.

C. ii) Protect and enhance the Borough's cultural and historic features and their settings.

D. i) Apply rigorous design standards that retain and enhance locally distinctive places, improve build quality and achieve efficient use of land."

Policy ST2 relates to the Spatial Development Strategy for the borough, and outlines a number of principles which development should follow in order to be distributed across the borough.

Policy T2 relates to Information and Communications Technology. It states:

"Developments which seek to extend or improve connectivity through existing and emerging telecommunications in all parts of the Borough will be supported subject to appropriate safeguards.

Details of these safeguards and other requirements can be found in Development Management Policy DM23."

Supporting para. 6.3.1 acknowledges that improvements to communications technology can reduce the need to travel, for example through the provision of online services and home working and recognises that they are essential for stimulating and supporting economic growth. Para 6.3.2 states that the Council will support the development of new technologies and upgrading of telecommunications, and that the number of masts and sites for installations should be kept to a minimum.

Policy DM23 relates to Information and Communications Technology. It states:

"In considering proposals for information and communications technology development the following factors will be taken into account:

A. The need generally to avoid high quality landscapes and particularly visually prominent locations and to protect areas of natural and man-made conservation importance including Conservation Areas and Listed Buildings and their settings.

B. The need to site and design equipment in such a way as to minimise its impact on the surrounding area including adjacent or nearby residential areas.

C. In the case of masts, the availability of alternative sites or the possibility of sharing facilities with other operators. New masts will only be permitted if it can be demonstrated that mast-sharing is impractical.

All major new developments will be required to be enabled for Next Generation Access (NGA) Broadband."

Policy ENV4 relates to Heritage Assets. It outlines that the council's policy is to maximise the value of the Borough's heritage assets, by protecting listed buildings, conservation areas and other townscape and rural features considered to be of historic, archaeological or cultural value. It refers to Policy DM27 which sets out the Council's approach to development which affects built heritage and archaeology.

Policy DM27 sets out several criteria that development should meet to be permitted in areas of historic, cultural, and architectural importance. It states that development which affects Conservation Areas will only be permitted where it preserves or enhances the character or appearance of the area, and development which affects listed buildings or their setting will only be permitted where the development respects the architectural and historic character of the building, avoids any substantial or total demolition, and does not have a significant adverse effect on the setting or important views of the building.

Policy ENV5 relates to Protecting and Enhancing the Borough's Landscapes. It states that the Borough's landscapes will be protected and enhanced by protecting all landscapes from inappropriate change, and where the benefits of the development outweigh the potential harm, ensuring that the impact of the development is minimised through adequate mitigation. It also states proposals will be supported where they enhance the value of the Borough's landscapes.

'Saved' policies from the Copeland Local Plan 2001-2016

There are no 'saved' policies from the Copeland Local Plan which are relevant in the determination of this application.

Egremont Conservation Area Appraisal

Egremont Conservation Area Appraisal has been prepared to be used during the development control process to gauge the impact of potential developments that are within, or may affect the setting of, the Conservation Area.

Egremont Conservation Area was designated in 1985 and covers an area of approximately 8.5 hectares.

St Mary and St Michael's church is noted as a Grade II listed Victorian gothic church which was design by Thomas Lewis Banks (a notable architect responsible for several prominent local buildings). It replaced a late 12th Century church in 1881, parts of which were incorporated. It is constructed in red sandstone.

The Conservation Area Appraisal states:

"The church contributes well to the sense of occasion of this part of the conservation area. Combined with the Market Place and the slight irregularity of South Street, it retains a delightful historicity that is only intermittently undermined by the contrasting areas to the south and east. These conspire to give the impression that the precinct is perched on the edge of the historic town and has suffered encroachment. However, as can be seen, mature deciduous trees screen the church from much of its surroundings, suggesting a seasonal variation in the feel of this enclave."

The ironwork on the boundary of the church is also noted as a "beautiful and locally made" feature of the Conservation Area.

Cumbria Local Enterprise Partnership – Infrastructure – "Improving our Digital Connectivity"

Cumbria Local Enterprise Partnership (LEP) acknowledge that access to both a good quality mobile phone signal and mobile data services is increasingly important for businesses, visitors, and local residents of Cumbria. They state *"currently, mobile signal 4G mobile data connectivity is relatively poor in many parts of Cumbria and is highly dependent on different mobile providers. The importance of improving digital connectivity in Cumbria cannot be overstated."*

The 'Connecting Cumbria' project has aided in rolling out superfast broadband in the county and has been a major success, with almost 95% of properties in Cumbria now able to access superfast broadband, exceeding its initial targets. However, the LEP acknowledge that this work needs to be built on and extended, with one of its targets being to *"improve mobile connectivity to provide improved 4G coverage from mobile network operators, supporting the digital investment proposed as part of the Borderlands Inclusive Growth Deal"*.

Cumbria Local Enterprise Partnership – Strategic Economic Plan

The Cumbria LEP Strategic Economic Plan (SEP) sets out a "four by four" approach in order to unleash Cumbria's full potential. It concentrates on four strategic priorities with intervention through four economic drivers, which will aid in delivering and driving economic growth at a county, national and international level.

The third strategic priority identified is "Vibrant rural and visitor economy". The SEP states:

"The resilience of Cumbria's rural economy requires a broad base, accommodating businesses from a range of sectors. Agri-related businesses, the environment and tourism are interlinked"

and interdependent; they need to complement each other to enjoy mutual growth. To further business start-ups and expansions, we want to build upon pioneering new approaches to business support already tested in Cumbria, and ensure digital connectivity is no longer a barrier to growth [emphasis added]."

It also goes on to state that "digital connectivity is a key issue for rural communities... There is the opportunity to build on the pilot Rural Growth Network to broaden its reach and impact... Key activities are as follows... Comprehensive superfast broadband, 4G mobile network coverage, and open public WiFi networks to bring businesses and communities together."

Cumbria County Council Digital Infrastructure Strategy 2020 – 2025

The Cumbria County Council Digital Infrastructure Strategy sets out a Vision and aims for the Cumbria region in relation to digital connectivity and growth. The Vision states:

"Our vision is to maximise deployment of full fibre and mobile infrastructure, in order to support:

- Economic growth of our businesses.*
- Digital inclusion so that no resident or business is left behind.*
- Delivery of more effective and efficient provision of local public services.*

Digital infrastructure is a key enabler which supports the delivery of our Council Plan and contributes to our priority outcomes for the people of Cumbria."

The introduction to the Strategy clearly outlines the importance that Cumbria County Council place upon digital infrastructure and connectivity. It states:

"Digital infrastructure is now recognised as the fourth utility given its importance to modern life and the connectivity it provides to services and markets. Providing futureproof digital infrastructure to all residents and businesses in Cumbria... is a key enabler for economic growth, education and social inclusion.

The Coronavirus pandemic has only served to reinforce the importance of digital connectivity. From getting the latest information and health guidance, home working, education and learning, online access to food and supplies, staying connected to family and others and to maintain supply chains – we all now depend on the ability to connect remotely across distance. It is expected that work patterns post Covid-19 will feature more home working and flexible working. Students and children will have an even greater need to study online. Business models will have a bigger online presence and the Council must be able to deliver as many of its services digitally to as many citizens as possible.

4G coverage has also improved significantly since 2017 through the work of the commercial programmes and in preparing to support the new 4G based Emergency Services Network. However, 4G coverage remains 'patchy' with significant large areas of countryside being unconnected particularly affecting our agricultural and tourism sectors."

The Digital Infrastructure Strategy acknowledges that there are barriers to the roll out of telecommunications infrastructure due to several factors, including geographical challenges, general rurality and perceived planning barriers. It states that the Council will work with service providers to overcome these barriers where possible in order to “support the convergence of technology for seamless connectivity to services”.

The Council recognise that “providing digital infrastructure to all residents and businesses in Cumbria... is a key enabler to facilitate delivery of the Council Plan.”

Online Nation 2022 Report

Online Nation is an annual research report, published for the first time in 2019. Using research produced by Ofcom and others, it looks at what people in the UK are doing online, how they are served by online content providers and platforms, and their attitudes to and experiences of using the internet.

The latest Online Nation 2022 report (published June 2022) found that for most people in the UK, being online is a major part of daily life. Being online allows people to connect with others, sometimes in ways they may not be able to do offline. Data shows how we benefit from a range of online services, from messaging and calling platforms to gaming platforms, online news outlets and online shopping.

The Meta-Owned social media apps (Facebook, Instagram, Whatsapp and Facebook Messenger) made up the top four smartphone apps most visited daily by UK adults in September 2021. The top-reaching smartphone app was Whatsapp (88% of UK online smartphone using adults) closely followed by the Facebook app (87%).

94% of UK adult internet users aged 16+ said they used an online communications service for making voice/video calls or sending messages in 2021, and 80% of children aged 3-15 did the same.

The 2022 report found that the UK adult internet users spent almost 4 hours online a day in September 2021, with 3 of those hours being spent on smartphones. One in five people only use a smartphone to go online compared to one in ten last year. News and government public services are among the most-visited websites and apps in the UK.

The majority (67%) of UK internet users aged 13+ feel that the benefits of being online outweigh the risks. 43% agree that being online has an overall positive impact on their mental health.

The report found that 60% of children aged 8-15 say that using social media and messaging platforms makes them feel closer to their friends. More than three-quarters of children aged 12-15 said that being online can help with their school/homework, whilst half said it can be used to learn a new skill.

The Online Nation 2022 report acknowledged that the global pandemic since March 2020 has resulted in significant changes in online behaviour. Online shopping habits developed during the lockdown periods have remained. The largest online platforms' revenues and profits increased significantly during the lockdown periods and this growth continued in 2021. The growth is being driven by UK consumers' increased spend on e-commerce and entertainment subscription services, while advertising revenues are also increasing with the continuing brand migration to online.

Figure 1.2 of the Online Nation 2022 report indicates that the percentage of UK online adults accessing the internet, by device, in 2021 was the highest by smartphone at 88%. In September 2021 73% of the time spent online by UK adults per day was on a smartphone.

Figure 1.2: Percentage of UK online adults accessing the internet, by device: 2021

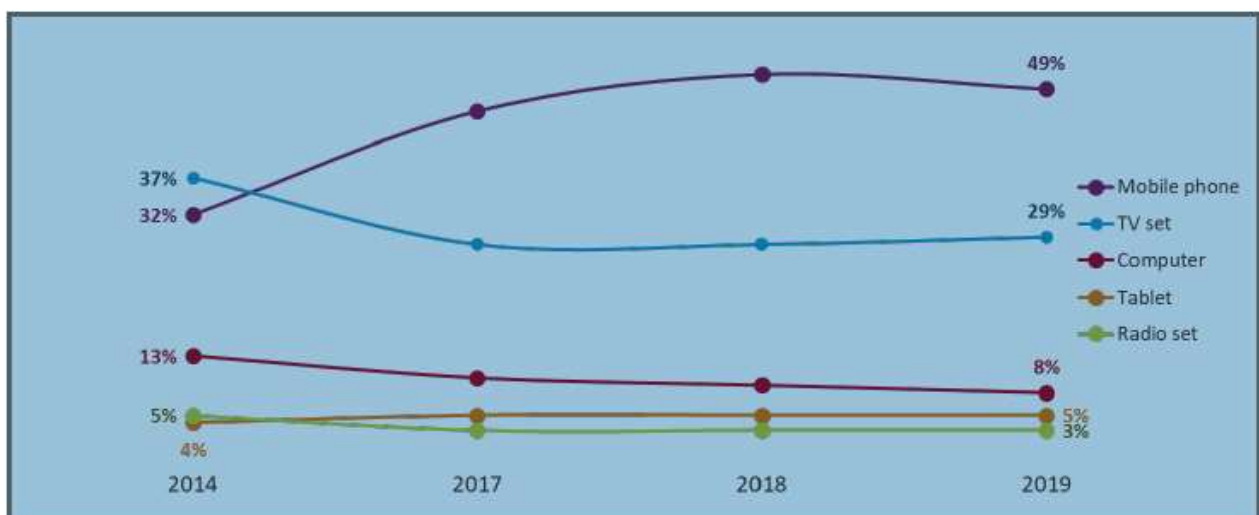
Percentage of adult internet users	Smartphone	Tablet	Laptop	Smartphone only
2021	88%	43%	53%	21%

Source: Ofcom Adults' Media Literacy Tracker 2021: Core survey and CATI omnibus survey. IN1. Which of these devices do you use to go online? (MULTI CODE) Base: All adults 16+ that go online (at home or elsewhere) (excluding those who did not give a response at the postal survey) (3577)

Reproduced from Online Nation 2022 Report

Other relevant information

The table below, taken from Ofcom Adults' Media Literacy Tracker, indicates the most-missed device among adults were it be taken away from them, using data collected 2014-2019. As can be seen, nearly half of all adults say that their mobile device is the device they would miss the most were it taken away from them.



Source: Ofcom Adults' Media Literacy Tracker 2014-2019

More people than ever now rely on their mobile phones for day to day, and even hour to hour, access to services. For example, some people use their mobile phones to monitor their health, such as diabetics. Mobile phones can be a lifesaver in that sense, just as much as being able to call 999 in an emergency.

Levelling Up the United Kingdom (February 2022)

Digital Connectivity is a focus area and the mission is 'By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population'.

Chapter 3 - The Policy Programme:

Para 3.2.4 - By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population

This mission is focused on improving digital connectivity.

Digital connectivity: The case for action

The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation. Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working. However, there are significant spatial disparities in the quality of broadband and mobile networks, with rural areas likely to experience worse digital connectivity than urban areas. Infrastructure is only part of the picture: economic benefits will only materialise if businesses and workers have the skills to take advantage of improved infrastructure.

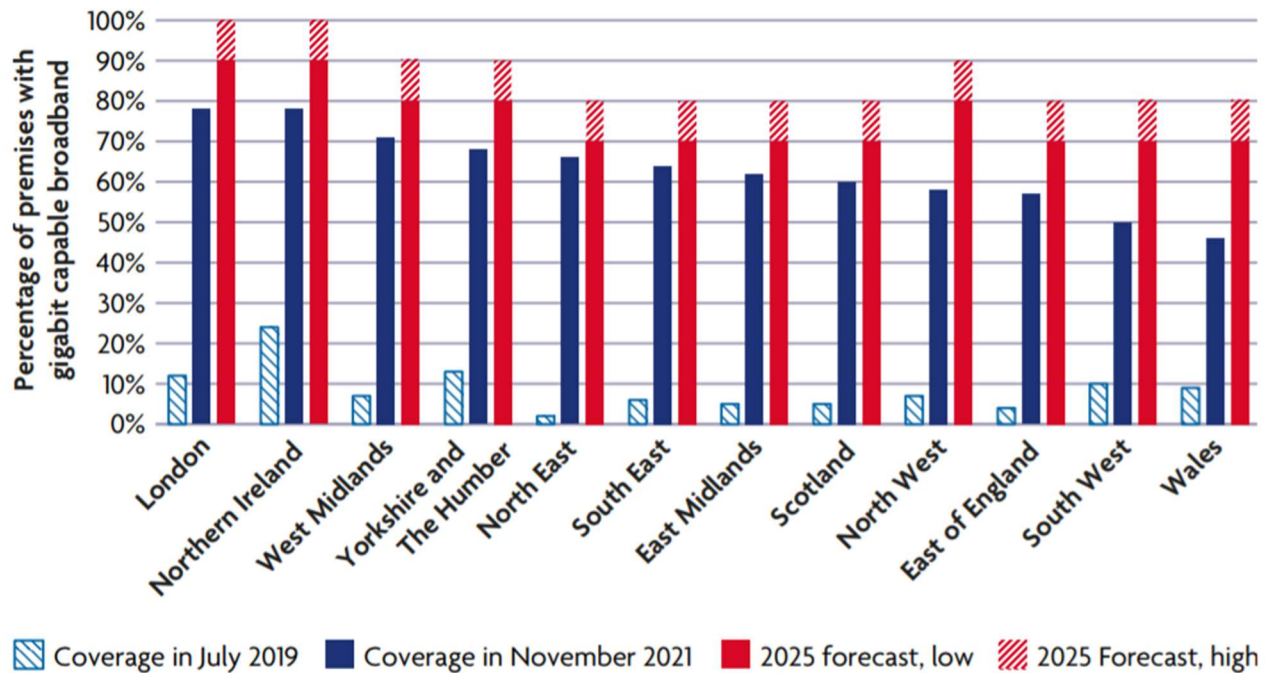
More broadly, high quality digital infrastructure can deepen local labour markets through remote working, making it more attractive for both workers and companies to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive growth and jobs in new areas. Existing specialisms in the UK regions have the potential to generate strong tech clusters, such as fintech in Scotland and Wales, e-Commerce in the North West and Northern Ireland, and Agri-Tech in Yorkshire and the Humber. The sector also provides opportunities for raising living standards – median earnings for the sector are 50% higher than the UK average.

The policy programme In 2020, the UK Government published the National Infrastructure Strategy, committing to providing £5bn in public funding to roll out gigabit broadband to at least 85% of the country by 2025, and subsequently to as close to 100% as possible, working with the private sector.

Public investment will target premises that are hardest to reach and which would otherwise not be provided for by the private sector, ensuring no areas are left behind. Gigabit coverage has increased from 10% to over 60% in less than two years. Since 2019, coverage has improved

across the UK, and the UK Government anticipates the following additional improvements to be delivered as a minimum by 2025, as set out below.

Figure 3.1 Gigabit coverage improvements, UK countries and regions, 2019, 2021 and 2025 (forecast)



Source: Levelling Up the United Kingdom.

We must ensure that people have sufficient digital skills to reap the benefits and prosperity arising from the digital economy. In 2020, the UK Government introduced a new digital skills entitlement, giving adults with low or no digital skills in England free access to new digital skills qualifications based on employer-supported national standards. The UK Government continues to work with local leaders to develop Local Digital Skills Partnerships. These collaborative partnerships are now operating in seven regions across England, with an eighth formally launching in Hull and East Yorkshire in early March. The UK Government will work with devolved administrations to consider how best to share the insights and evaluation of the programme to help build digital skills capability across the UK.

Planning Assessment

The main issues arising from this application to upgrade the existing telecommunications site at St Mary and St Michael's Church are whether the proposed installation of a GPS node and internal works would be detrimental to the character and appearance of the area, and whether the benefits of the proposal would outweigh any perceived harm to the heritage assets (the Church is Grade II listed and located within Egremont Conservation Area).

The principle of siting telecommunications equipment in the church was accepted many years ago and the proposal is for the upgrade of the existing site. The upgrade of an existing telecommunications site is in full accordance with Policies T2 and DM23 of the Copeland Local Plan.

The proposed works comprise the installation of a GPS node and associated internal works.

The GPS node will be bracketed off an upgraded antenna support pole. The bracket holding the GPS will exit the church tower through a slot in the upgraded louvres in order to sit externally. The GPS needs to be located externally to achieve a clear line of sight with the sky, in order to operate effectively. The proposed GPS node is very small (approximately the size of a tennis ball) and, given its height above ground level at 16.15m, it is not considered that it will be overly noticeable in views of the site from public vantage points at ground level. The character of Egremont Conservation Area will therefore be conserved, and the proposal complies with Policies ENV4, ENV5 and DM27 of the Copeland Local Plan.

The application also proposes internal works, which comprise of the removal and replacement of 3 no. antennas, to be located on upgraded support poles, the removal and replacement of the existing GRP louvres, the removal and replacement of existing timber backboards with mesh, the installation of 1 no. equipment cabinet and 1 no. ERS rack to be bolted to the existing steel grillage floor within the existing equipment room within the church tower, and the installation of ancillary equipment, including MHAs and active routes, which will be fixed to an existing cable tray in the equipment room.

There is no requirement for any new drilling of equipment to the material of the listed building. The upgraded antenna support poles will be fixed to existing clamps and steel plates which are already in situ. The mesh will be fixed to the existing timber frames once the timber boards are removed. The proposed cabinet and ERS rack will be bolted to an existing steel grillage floor which is already in situ. This is in full accordance with the aim to conserve the historic importance of the Borough's listed buildings as outlined in Policies ENV4 and DM27 of the Copeland Local Plan.

The proposed upgrade will improve connectivity in this area of Egremont, which is acknowledged in the Copeland Local Plan as being a requisite of economic growth and sustainability. The proposal therefore will help Copeland to meet the aims as outlined in its Vision and Strategic Objectives.

Due to the minimal nature of the proposed works, and the care that has been taken to ensure that the fabric of the Listed Building will not be altered, it is not considered that the proposal will cause a detrimental impact to the character of the Conservation Area, nor on the historic importance of the Grade II Listed Building.

Due to the technical requirement of these works, in that it is necessary to upgrade this specific site, no alternative sites were considered. Upgrading an existing site is also the sequentially preferable option as per the guidance set out in NPPF and the Code of Practice. It also ensures that a new site is not required elsewhere in the immediate area to improve capacity

for customers on the network, thus the number of sites is minimised, in full accordance with Policies T2 and DM23 of the Copeland Local Plan.

Summary

This is an upgrade to an existing established telecommunications site located at St Mary and St Michael Church, Egremont. A GPS node will be fixed to a bracket off an upgraded antenna support pole. None of the proposed internal works will result in the need for any new drilling into the fabric of the listed building.

Although the GPS node will be located externally, it is very small in size, and it is not considered that it will be particularly noticeable given its height above ground level. Any perceived harm to the listed building or conservation area in this regard would be at the very lowest end of the scale of less than substantial, and the benefits of the proposal, to provide enhanced capacity to the local area, would outweigh any such perceived harm.

The proposal is fully supported by NPPF and the Code of Practice. The policy also fully complies with the relevant local planning policy as outlined above.

Confirmation that submitted drawings have been checked for accuracy

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Position:	<u>Town Planner</u>	(on behalf of MBNL, for and on behalf of Hutchison 3G UK Limited)	<u></u>