



**SUPPLEMENTARY INFORMATION IN SUPPORT
OF
APPLICATION FOR PRIOR APPROVAL**

November 2019

**On behalf of
MBNL, EE (UK) Ltd and Three (UK) Ltd**

Site Ref. MBNL: WEH011, Hatfield New Office

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Hatfield New Office	Site Address:	Building 3, Trident Place, Mosquito Way, Hatfield, Hertfordshire, AL10 9BW
NGR:	E 521818, N 209206		
Site Ref Number:	MBNL, WEH011	Site Type: ¹	Macro

2. Pre Application Check List**Site Selection**

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	No
If no explain why: N/A		
Was the industry site database checked for suitable sites by the operator:	Yes	No
If no explain why: N/A		

Pre-application consultation with LPA

Was there pre-application contact:	Yes	No
Date of pre-application contact:	24/09/2019	
Name of contact:	N/A	
Summary of outcome/Main issues raised: A consultation letter and associated plans were sent to Welwyn Hatfield Borough Council on 24/09/2019. At the time of writing, no consultation response had been received.		

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
<p>Outline Consultation carried out:</p> <p>The proposal was rated as Green in accordance with guidelines set within the Code of Best on Mobile Network Development (published 2016). Pre-application consultation was also undertaken with the Ward Members for Hatfield Villages and with Hatfield Town Council.</p>			
<p>Summary of outcome/Main issues raised:</p> <p>At the time of writing, no consultation responses had been received. Lines of communication will remain open throughout the application process.</p>			

School/College

<p>Location of site in relation to school/college:</p> <p>There are no schools identified within 200m of the application site.</p>
<p>Outline of consultation carried out with school/college:</p> <p>N/A</p>
<p>Summary of outcome/Main issues raised:</p> <p>N/A</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>N/A</p>		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	18/11/2019	

3. Proposed Development

The proposed site:

The application site is on the roof-top of a multi-storey office building of modern design. The building is occupied by the mobile Operator Everything Everywhere (part of BT) and forms part of Hatfield Business Park. Surrounding land uses are primarily office and commerce related. The A1001 Comet Way passes to the east of the site, beyond which there are residential dwellings in the distance.

A neighbouring building within the same business park – building No.1 – presently accommodates the mobile Operator's communications equipment. This apparatus forms a base-station providing mobile communication services to customers on the Everything Everywhere and Three networks. Owing to legal matters, it is necessary to relocate the base-station onto the application site – building No.3. The base-station will be relocated and upgraded at the same time.



Figure 1. Aerial view of application site. Source: Google

Type of Structure: Rooftop installation.

Description:

Installation of electronic communications apparatus and support structures onto building roof-top, plus ancillary works.

Overall Height:	
Height of existing building:	Approx. 20.7m
Equipment Housing:	
New equipment housing cabinets of modest size will be installed onto the building roof-top. This element of the proposal is permitted development. The antenna support structures require an application for prior approval.	
Materials:	
Tower/mast etc – type of material and external colour:	Antenna support structures to be galvanised-steel.
Equipment housing – type of material and external colour:	Equipment cabinets would be coloured green or grey and would not be highly visible from ground-level.

Reasons for choice of design:
<p>The base-station has been designed to accommodate emerging 5G technology which will have ultra-fast mobile connectivity and is capable of operating the 'Internet of Things'. This is in addition to providing 2G, 3G and 4G services from the site.</p> <p>The upgrade will provide higher mobile down-load speeds and more reliable, quicker mobile phone connections. There would be increased capacity to provide services to a higher number of people at the same time.</p> <p>These improvements can only be provided by using a higher number of upgraded antennas that are larger in scale than the existing. Each of the operators (EE & Three) requires their own set of antennas for each of the services they will provide.</p> <p>In the same regard as the existing, the replacement antennas are strategically positioned so that they can collectively provide 360 degree radio coverage to the surrounding area. The antennas must be allowed to unrestrictedly emit a radio signal which is why they are mounted onto elevated support structures, reducing signal interference from structures in the surrounding area such as other buildings and trees.</p> <p>The radio frequencies that 5G operates at is particularly sensitive to interference from other structures which necessitates elevating the antennas higher than the existing. The above factors have informed the layout and design of the proposed apparatus.</p> <p>The proposed cabinets need to be sited reasonably close to the antennas that they will serve in order to avoid impractically long cable feeds and the associated electrical losses. This has partly informed the layout of the apparatus.</p> <p>Service personnel would continue to access the site via existing highways and building stairwells. There would be no need for additional carpark spaces.</p>



Fig 2a. Photograph of host building, Image source: Google.



Fig 2b. Photograph of host building,

4. Technical Information

	Yes	No
<p>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.</p> <p>When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, EE (UK) Ltd and Three (UK) Ltd operate their networks in such a way, that the radio frequency power outputs are kept to the lowest levels to commensurate with effective service provision.</p> <p>The proposed telecommunications infrastructure, which is 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.</p>		

5. Technical Justification

<p>Reason(s) why site required e.g. coverage, upgrade, capacity:</p>
<p>MBNL is a joint venture owned by EE (UK) Ltd and Three (UK) Ltd. MBNL undertakes the management and network deployment of telecommunications sites on behalf of both EE (UK) Ltd and Three (UK) Ltd.</p> <p>Mobile telecoms networks are now ubiquitous throughout the UK. It is an expectation that an individual can connect and use their mobile phone whenever and wherever they so require. With the advent of new technology, under the banner of 5G, further advances are proposed and central government has seen the telecoms industry, and in particular 5G, to be at the forefront of economic development.</p> <p>The expectations are that future telecoms technology will support government policy regarding digital inclusion; improvements in health and social care; assisting in local economic growth; advancing the development of Smart Cities and supporting innovative uses throughout the transport sector for both personal and public travel. In addition, EE (UK) Ltd will be supporting the communications requirements of Emergency Services where further rollout and improvements in the 4G signal is currently being progressed.</p> <p>At the beginning of March 2017, the Department of Culture, Media and Sport (DCMS) issued an updated UK Digital Strategy (UK Digital Strategy) with the goal of ensuring that the UK delivers a "world-leading digital economy that works for everyone".</p> <p>The government has noted within the Digital Strategy that the UK lags behind other similar nations in the delivery of fast, reliable, consistent connectivity for its population, wherever they are in the Kingdom. In conjunction with the new Electronic Communications Code (2018), the DCMS wishes to make it easier for operators to upgrade and share their equipment with other operators in order to help increase coverage. The DCMS also sees new technology and improved connectivity and coverage as key to the future growth, both socially and economically, of the UK.</p> <p>The proposed new installation and upgraded equipment provides the latest technology and the ability to prepare for new technology such as 5G. At the heart of the new legislation, and one of the Government's key aims, is to deliver on the public benefit of having access to a choice of high quality electronic communications services.</p>

6. Site Selection Process

It is proposed to upgrade and relocate an operational base-station which is providing mobile communication services to customers in the surrounding area that are on the EE or Three networks. The upgrade proposes to introduce the provision of new services from the site, as well as improving the existing services.

The National Planning Policy Framework stipulates that:

*“The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. **Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged.**” (para. 113)*

The proposal adheres to national planning policy with respect to providing new communications capability through the use of an existing building. Furthermore, the principle of the business park being used to host telecoms apparatus has already been established by virtue of the extant planning permission for the operational base-station. Albeit at a neighbouring building of very similar design and in the same local context.

It is important to note that the operational base-station forms part of a nationwide radio network with each base-station connecting by communication link, and collectively ensuring that the country has the best level of coverage possible. Therefore if the new communication services proposed were to broadcast from a new site which is not in the immediate vicinity, it would impact coverage and affect the wider network.

Imagery shows that the application site is one of the only buildings in the immediate area that provides an elevated and flat-roof platform from which to provide radio coverage. These are some of the reasons why this group of buildings were selected as the preferred location for the existing base-station.



Fig 4. 3D images of application building and local context. Source: Bing Maps.

Development Plan

The application must be determined in accordance with the authority's statutory development plan which includes saved policies from the Welwyn Hatfield District Plan (adopted 2005). The application site falls within land allocation 'EMP1 Employment Areas'. The following excerpts from the development plan are particularly relevant to the proposal:

I EMPLOYMENT: STRATEGY & OBJECTIVES

*'to bring about a better balance between the levels and types of housing and jobs in the district and between the skills of the local workforce and the skill requirements of the jobs created, in order to help in reducing commuting flows into and out of the district and thereby **reduce the need to travel**' (para. 12.16)*

I ACCEPTABLE USES IN EMPLOYMENT AREAS

*'The approach set out in paragraph 12.19 above provides clarity for existing occupiers and potential investors and thereby facilitates continued investment and the regeneration of the older parts of the Employment Areas, through the upgrading of existing building and facilities and through redevelopment. **The Council will give favourable consideration to proposals for the redevelopment of existing employment sites, in the designated Employment Areas, which would update and improve the quality of the employment stock in the district.**' (para. 12.21)*

I POLICY R21 - TELECOMMUNICATIONS DEVELOPMENT

'Proposals for telecommunications development will be considered against the following criteria:

For mobile phone masts, base stations and transmitters:

*i. For new free standing masts, the applicant must be able to demonstrate that there are technical reasons which prevent the **installation of the apparatus on existing masts, buildings or other structures;***

ii. New free standing masts must have sufficient spare capacity to allow mast sharing, subject to any technical or environmental constraints, which will be secured by the use of planning conditions or Section 106 Agreements;

iii. All applications and determinations must be accompanied by information on the level of emissions likely to be generated by the installation and the level of emissions must fall within the ICNIRP (International Commission on Non-Ionising Radiation Protection) guidelines and the advice contained in PPG8 in relation to emissions near college, school, nursery or pre-school playgroup grounds and buildings;

iv. Clear public exclusion zones should be placed around all base station antennae together with appropriate warning signs;

v. All applications and determinations received for mobile phone masts, base stations and transmitters proposed near college, school, nursery or pre-school playgroup locations must include details of consultation in line with PPG8 or its successor.

For all telecommunications development, including mobile phone installations, domestic satellite equipment and radio masts:

*vi. The **development must not harm the appearance of the street scene** nor appear visually intrusive;*

*vii. The **development must not harm the character of a Conservation Area** nor the character and setting of a Listed Building;*

*viii. If erected on a building, **it must not be out of keeping with the building**, in terms of siting, scale, size, profile and colour, so as to harm the appearance of the building*

ix. If proposed in areas designated for their landscape, historic or nature conservation importance, including Conservation Areas and the Green Belt, applicants must be able to demonstrate why sites outside these areas cannot be used.'

Other Local Policy

The Welwyn Hatfield Local Plan will replace the District Plan and was submitted for examination in May 2017. The Draft Local Plan Submission Document (August 2016) is at a sufficiently advanced stage to be a material consideration when determining planning applications. The following excerpts from the plan are particularly relevant to the proposal:

I BOROUGHWIDE OBJECTIVES

*'To deliver a sustainable pattern of development by directing the majority of new development to the main towns and limited development to the excluded villages where it can be **supported by appropriate infrastructure, the need to travel is minimised** and opportunities for redevelopment on previously developed land can be maximised.'* (p 30)

I INFRASTRUCTURE DELIVERY

'In order for communities to be successful, it is vital that they are well served by a range of infrastructure that is appropriate to people's needs, affordable and accessible. The term infrastructure encompasses a wide range of services and facilities provided by both public and private sector agencies, but can generally be grouped into three main areas:

*Physical Infrastructure such as: transport infrastructure (roads, public transport, pedestrian and cycle routes, public rights of way and bridleways), cemeteries, **communications**, district heating systems, gas and electricity infrastructure, water provision and treatment, sewerage works and waste collection, recycling and disposal.'* (para. 13.1)

I POLICY SP 13 – INFRASTRUCTURE DELIVERY

*'To support the delivery of sustainable communities, the Council will **ensure that suitable provision is made for new or improved infrastructure, required to meet the levels of growth** identified in this Local Plan...'*

I COMMUNICATIONS

'Earlier government aims for ensuring the UK is at the leading edge of global digital technology were set out in the Digital Britain Bill (November 2009). The Digital Britain Final Report (2009) included actions to strengthen and modernise the communications infrastructure and included the aim of delivering the 'Universal Service Broadband Commitment' so that everyone has access to broadband technology by 2012...' (para. 13.29)

I POLICY SP 22 – NORTH WEST HATFIELD

*Land at north west Hatfield is allocated for development in this Local Plan to accommodate approximately **1,650 new homes** over the plan period. In accordance with the relevant policies of this Local Plan the site will provide:*

*Necessary new utilities infrastructure, in particular upgrades to the local sewerage network and electricity supply network, also including **integrated communications infrastructure to facilitate home-working**;*

National Policy

National planning policy and strategies are material in determining planning applications and in this case provide strong support in favour of the proposal.

National Planning Policy Framework

'Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.' (para. 112)

*'The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. **Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged.**'* (para 113)

'Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.' (para. 116)

UK Digital Strategy

In March 2017, the UK Digital Strategy was published by the Department for Digital, Culture, Media & Sport. The strategy is directly relevant to this proposal...

'Broadband and mobile must be treated as the fourth utility, with everyone benefiting from improved connectivity. This will play a crucial role in ensuring that everyone, wherever they live and however they connect, can make full use of digital services and benefit from participation in the digital economy. Improved connectivity also increases innovation and productivity across the economy, bringing significant economic rewards'

'5G is the next generation of mobile connectivity, and is currently in development. It is expected to represent a significant upgrade: providing ultrafast, low latency, and more reliable mobile connectivity, able to handle our ever-increasing data requirements. This should present huge opportunities to boost productivity and grow the economy. In addition to giving consumers and business users high quality connectivity, it will also support the development of the Internet of Things: the rapidly-increasing number of connected devices, from connected cars to digital health applications.'

Future Telecoms Infrastructure Review

In July 2018, the Department for Digital, Culture, Media & Sport published its findings of the Government's Future Telecoms Infrastructure Review.

'Alongside finishing the roll out of 4G networks to meet existing mobile demand, we want the UK to be a world leader in 5G to take early advantage of this new technology. We have set a target that the majority of the population will have 5G coverage by 2027.'

'The technical capabilities and performance characteristics of 5G are clear. 5G is expected to deliver faster and better mobile broadband services to consumers and businesses, and to enable innovative new services for industry sectors, including manufacturing, transport, immersive technologies and healthcare.' (p 10)

Proposal Assessment

Landscape and Visual

In considering the development proposal, a key consideration is the balance of protecting the visual amenity of the surrounding area whilst also allowing the local residents and businesses to receive the diverse range of benefits that the upgrade would support.

It is assessed that the key public viewpoints towards the site would be from the A1001 Comet Way to the east, and also from Mosquito Way to the west. The replacement equipment is unlikely to be highly visible from other locations because of the presence of buildings and vegetation providing visual screening.

It is observed that in views from the A1001, only one of the three antenna clusters would be visible. Views would be from medium distance and mostly indirect. The equipment would be in view for a short period of time given that commuters in vehicles would be travelling at approximately fifty miles-per-hour – the highway's speed limit.

In views from Mosquito Way, two of the three antenna clusters would be visible. It is significant that there does not appear to be any views of the building where all of the antenna clusters would be visible. Again, views from Mosquito Way would be indirect due to the host building's position set back from the road. Tree planting along the highway provides a good degree of screening so that the equipment would only be fully visible in isolated views.

The proposed equipment would be viewed in the context of a large-scale building, over 20m in height, which is of a modern design. The replacement apparatus should not look out of place in the context of the host building, and in the context of the wider business park. It is assessed that the resulting magnitude of landscape and visual change would be low.



Figure 4. View towards the site from A101. Antenna location denoted. Map source: Google.



Figure 5a. View towards the site from Mosquito Way. Antenna location denoted. Map source: Google.



Figure 5b. View towards the site from Mosquito Way. Antenna location denoted. Map source: Google.

Material Benefits

The proposal would contribute to the delivery of a diverse range of benefits with respect to improved digital inclusion, health and social care, economic growth, smart cities and transportation. Please refer to enclosed supporting documents published by Mobile UK and the introductions below.

The upgraded base-station would have increased capacity to meet the demands of a growing Hatfield, for both businesses and residential communities, providing improved and more reliable services. The upgrade would make the site 5G ready, delivering notable economic and social benefits such as ultrafast mobile connectivity and improved social inclusivity.

The base-station has been designed to accommodate emerging 5G technology which will have ultra-fast mobile connectivity and is capable of operating the 'Internet of Things'. The upgrade will provide higher mobile down-load speeds and more reliable, quicker mobile phone connections. There would be increased capacity to provide services to a higher number of people at the same time.

When the site commences the provision of 5G services, the surrounding area would have the infrastructure to facilitate the 'Internet of Things'. This is the principle of connecting devices over the internet to support smart homes and smart cities. For example, connecting home heating systems to our smart phones or enabling the operation of autonomous vehicles – all contributing to a more sustainable way of life.

The location of mobile base-stations is strategically important and often informed by population densities. In this case the position of the base-station allows mobile coverage to be provided to the thousands of customers living and working in the surrounding area, including to the businesses operating from Hatfield Business Park and to the high number of commuters and haulers on the A1(M) motorway.

The proposal would support the development plan's vision of Welwyn Hatfield being a sustainable authority. Reliable and high-speed mobile connectivity is a necessity for practices such as home working which reduces the need to travel, thereby reducing congestion on roads and greenhouse gas emissions. See District Plan, para. 12.16 and Draft Local Plan, Borough wide Objectives.

The development plan sets out aspirations for new significant amounts of new development over the life of the plan, both employment related and the objective to deliver new homes (Draft Local Plan, Policy SP22). Such development and population growth will put increased strain on existing infrastructure. The upgrade of this base-station would increase its capacity to meet current and future demand for services.

Access to communication services is now recognised as an essential infrastructure provision for new development. For Hatfield to attract and retain new businesses, residents and general investment, it must be able to compete with other localities which means providing access to the latest communications services. The host building sits on regenerated employment land and it is imperative that the businesses which operated from Hatfield Business Park, and surrounding areas, have the highest quality communications. See District Plan, para. 12.21.

Furthermore, it is material that the base-station would help to secure the long-term economic viability and therefore maintenance and appearance of the host building by way of a continued rental income provided by the mobile operators. This has a direct effect on the appearance of the surrounding area.

The development plan is unambiguous in its support the provision of new infrastructure. This proposal would see the relocation and upgrade of a building-based telecommunications base-station providing communications infrastructure. The site would be shared by the two mobile operators EE and Three, avoiding the need for each operator to establish independent sites and thereby minimising environmental intrusion. The proposal is considered to be in accordance with Policy R21 of the District Plan.

Conclusion

The proposed upgrade of this mobile base-station would provide the latest communication services for surrounding businesses and local residents, and the ability to prepare for emerging technology such as 5G. The proposal would deliver the Government's objective of the public having access to a choice of high quality electronic communications services. The improved connectivity would also help to strengthen Hatfield's digital economy, innovation and productivity.

The proposal presents an expansion of Everything Everywhere and Three's electronic communication networks, providing improved services for thousands of local customers. This would be delivered by way of a building-based and site sharing arrangement. This approach is fully in accordance with the NPPF and local planning policy.

A key consideration is the balance of protecting the appearance of the surrounding area while also enabling the growth ambitions for Hatfield to be suitably served by high capacity infrastructure. This statement has aimed to demonstrate that proposal would result in a low magnitude of visual change and any deemed harm should be weighed against the considerable public benefits set-out, including economic and social benefits.

It is considered that on balance the proposal would provide more benefits than harm and as such should be supported.

Contact Details

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