

**5G SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION
STATEMENT PREPARED BY DOT SURVEYING**

1. Site Details

Site Name:	ALBION STREET Upgrade	Site Address:	ALBION STREET WHITEHAVEN CUMBRIA CA28 9AA
NGR:	E: 297094 N: 517946		
Site Ref Number:	COP002	Site Type:	Existing telecoms installation upgrade

2. Check List

Site Selection

Was London Borough of Tower Hamlets mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why: It was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Pre-application consultation

Written offer of pre-application consultation:	N/A	
Was there pre-application contact:		Yes
Date of pre-application contact:	4 th August 2021	
Name of contact:	Local Planning Authority– by email	

Summary of outcome/Main issues raised:

H3G (Three) is committed to providing improved network coverage and capacity. In these unprecedented times of the Covid-19 pandemic, it is recognised that high-speed mobile connectivity is the lifeblood of a Community; facilitating educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home, as well as enjoying access to social, media and gaming for leisure time activities.

The pre-consultation invited comments within a two-week period and while the merits of high-speed telecommunications are generally recognised; pre-application has identified the need to carefully consider the risk of increased visual amenity to adjoining residential properties through the siting of telecommunications infrastructure within urban settings.

Following the submission of an e-mail to the council's planning department, to be best of our knowledge no formal response has been received. The e-mail communication included a set of planning drawings, site information sheet and an explanation behind the requirement for an upgraded telecommunications installation.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:

GREEN

Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss the development proposal and identify any site-specific issues.

The site has been given an GREEN rating under the Traffic Light Model 'TLR'.

Summary of outcome/Main issues raised:

Determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 as well as the objectives of the National Planning Policy Framework (February 2019).

Full details of the scheme are outlined within the planning drawings
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We consider upgrading an existing installation rather than adding a new one is best suited to extend high-speed mobile coverage to the target community. The scheme is also considered to fit with the Local Authority's critical role in delivering the UK Government's Digital connectivity vision and provides a basis for the Council to support the request for plans to speed up digital infrastructure rollout, as outlined by Ministers on the 27th of August 2020.

School/College

Location of site in relation to school/college:

N/A

Outline of consultation carried out with school/college:

N/A

Summary of outcome/Main issues raised:

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?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No

Details of response:

N/A

Developer's Notice

Copy of Developer's Notice enclosed?	Yes
Date served:	20 th August 2021

3. Proposed Development

The proposed site:

The proposed solution for improving capacity here involves the below changes:-

The removal and replacement of 3no. antennas onto existing poles, the re-location of 1No existing 0.3m microwave dish at a lower height by 500mm, the installation of 1No. new cabinet onto a new concrete base (having dimensions of 1900x600x1752), the removal and replacement of 1No existing cabinet together with the installation of ancillary equipment. The cumulative volume of all cabinets installed does not exceed 90m³.

The technical details of this proposal are illustrated within the enclosed application design drawings.

Three are in the process of building the UK's fastest 5G network and has 140MHz of 5G spectrum (and 100MHz of it contiguous), which means our service will be much faster and shall have the ability to handle more data. In making this technology available to customers, H3G will need to provide a mix of upgrades involving existing sites and the building of new sites.

The very nature of 5G and the network services it provides, means the equipment and antennas are quite different to the previous and existing, service requirements. In particular, the design of the antennas, and the separation required from other items of associated equipment.

In accordance with governmental guidance this existing site can be used in this instance via an upgrade rather than having to find a new location.

The equipment is considered unlikely to have any material impact on the local area as this is simply an upgrade of the existing installation rather than a brand new site.

Planning Policy Relevant to the Development Site:

Development Plan Policy: National Planning Policy Framework (February 2019)

Information and Communications Technology

- 10.4.6 Policy T2 sets out the strategic principles for improving Information and Communications Technology. This policy sets out requirements for assessing proposals for information and communications technology development.

Policy DM23 – Information and Communications Technology

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.

- 10.4.7 Advances in communications and information technology have resulted in a fast growing telecommunications industry. Whilst the Council is supportive of facilitating the growth of new and existing systems this should not be at the expense of, or damage, sensitive areas like high quality landscapes, important wildlife sites or Conservation Areas which will continue to be protected. Generally the Council will try to minimise the amount of infrastructure required to carry new technologies e.g. by encouraging mast-sharing for aerials, antennae and dishes.

We have sought to comply with this policy and also feedback received at the pre-con stage for this Prior Approval submission.

Type of Structure, upgrade to rooftop	
Description:	
Overall Height:	27m AGL
Height of existing building	N/A
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Tower/mast etc. - type of material and external colour:	See drawings
Equipment housing - type of material and external colour:	See drawings

Reasons for choice of design:
To facilitate 4G and after this 5G capacity and coverage to the surrounding area.

4. Technical Information

ICNIRP Declaration attached	Yes	
<p>ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). 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 the site are taken into account.</p>		

5. Technical Justification

Reason(s) why site required
<p>The National Planning Policy Framework (NPPF) clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this, the Applicant considers it important to explain the positive technical justification for the site and how the facility fits into the overall network.</p> <p>The site is required to provide new 5G coverage for H3G LTE and 4G capacity, improving service in and around the Mandeville Way and surrounding area. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 50m. In general, it would not be feasible to site the installation too far from the target locale</p>

6. Site Selection Process – alternative sites considered and not chosen.

Discounted Options
<p>In accordance with the sequential approach outlined in the NPPF, the following search criteria have been adopted. Firstly, consideration is always given to sharing any existing telecommunication structures in the immediate area, secondly; consideration is then given to</p>

utilising any suitable existing structures or buildings and thirdly, sites for freestanding ground-based installations are investigated.

This sequential approach is outlined below:

- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPPF, all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Mast Data register is always examined prior to the submission of a planning application.

Discounted Options and National Planning Policy:

The National Planning Policy Framework (NPPF) is clear that LPAs should not question the need for the installation under Part 116:

“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”.

We have been able to use an existing structure here.

7. Additional Relevant Information

Background to the Proposal

H3G supports Government ambition to be a global leader in the next generation of mobile technology set out within its March 2017 white paper, 'Next Generation Mobile Technologies: A 5G strategy for the UK' and expand its mobile network across the Basildon Borough Council area and specifically in this instance, to enhance 5G coverage levels in and around this area of Basildon.

Modern mobile phone base stations operate on a low power and accordingly, need to be located within close proximity to the areas they are required to serve. Increasingly, people are also using mobile devices in the home which requires the installation of base station infrastructure closer to such residential areas.

The proposed scheme has been designed to ensure the fundamental principles of good siting and appearance are adhered to. The overall impact of the installation on the environment is therefore considered limited when viewed in the context that high-speed mobile connectivity is the lifeblood of a Community

DEVELOPMENT PLAN POLICY:

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, stated that:

“Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise.”

NATIONAL PLANNING POLICY:

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF July 2018) sets out the Government’s planning policies for England and how these are expected to be applied at the Local level. It provides a framework within which local people and their representative Councils can shape distinctive local and neighbourhood plans, which reflect the needs and priorities of their own communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including;

- Economic Role - contributing to building strong, responsive and competitive economy;
- Social Role - Supporting strong vibrant and healthy communities; and
- Environmental Role - Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. The NPPF recognises the vital importance of high-quality telecommunications and dedicates a whole chapter to this area. Chapter 10 of the NPPF outlines the Governments support for high quality communications. The paragraph extracts highlighted below, clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 112 states:

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

Contact Details

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	_____		_____
Signed:	_____	Date:	<u>20th August 2021</u>
Position:	<u>Planner</u>	Company:	<u>Dot Surveying Ltd</u>
		(on behalf of above operator)	
	_____		_____

