

Telecommunication Installation

For

T – MOBILE (UK) LIMITED

AT

JUNCTION OF WESTERGATE STREET
AND
MEADOW WAY
WESTERGATE
PO20 3QT

SUPPORTING STATEMENT

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1 Introduction

T-Mobile is authorised to operate a public electronic communications network and provides an electronic service in accordance with the provisions of the Communications Act 2003 and the Electronic Communications Code. In order to provide facilitate this T-Mobile has been conferred the status of a Public Telecommunications System Operator and aims to meet all reasonable demands for that service.

While much of the second-generation network is now well established there are still some parts with limited coverage and a growing increase in demand for services. In addition there are some locations where the capacity of the existing network is inadequate to deal with the number of customers seeking to use the service.

As well as providing this second generation of coverage T- Mobile is licensed to develop and operate a 3rd Generation UMTS telecommunication networks This licence places an obligations on T-Mobile to ensure that at least 80% of the UK populations are covered by December 2007.

It is the Governments policy as stated in Planning Policy Guidance Note 8 Telecommunications 2001 to facilitate the growth of new and existing telecommunication networks whilst keeping the environmental impact to a minimum. This policy states: -

'Fast, reliable and cost-effective communications can attract business to an area and help firms remain competitive, thus contributing to the achievement of other policy goals, including increased employment opportunities. This is particularly important in the development of the single European market and in the creation of an environment in which major national and international companies would want to expand. It is equally important for broadcasting and for small businesses, and for new methods of employment, such as home-working. Good communications can enrich life at home and offer new choices in education and entertainment, in shopping and banking. Modern telecommunications can benefit the environment through reducing the need to travel, and hence reducing vehicle emissions of carbon dioxide and other pollutants'.

2 The Proposal

The proposal is for a 12m replica telegraph pole type mast and associated equipment cabinets.

I would advise that as the cabinets are less than 2.5 cubic meters in volume and they are required in association with this telecommunication development, that they constitute permitted development by virtue of Class A, that is not subject to condition A.3. As such the cabinets do not require the prior approval of the local authority for their siting and external appearance. Accordingly the cabinets should not form part of the consideration when assessing the planning merits of the development. The cabinets are included in the application as part of the operator's ten commitments to provide full information.

3 The Application Site

The site is located within Westergate approximately 8 miles north of Bognor on the A29. The search area contains predominantly residential.

The topography of Westergate rises slightly from 7m to 9m AMSL from South to North.

The site forms grassed highway verge on the A29 a busy carriageway at the Junction with Meadow Way. There are a number of existing items of street furniture including 10m high lampposts along the street scene In addition there is also a line of mature semi mature trees approx 8-10m in height.

The rear of the site is marked by a hedgerow approx 4m in height beyond this lies residential provision, which is fully screened from the installation.

The nearest residential properties with principal windows facing the site (that are not screened) are located on the opposite side of the road and are approx 40m from the site.

The site has no specific designation within the Arun District Local Plan Adopted 2003 however it is in the 'built up area'.

Access will be gained via Westergate Street.

The proposed site location is photographed below.



4 Pre Application Consultations

Prior to the submission of this application a consultation letter was sent dated 12 March 2007 to the Arun District Council planning department on behalf of T-Mobile. This provided details of the search area, proposed and rejected sites and requested details of any existing telecommunication installations, planning constraints and any potential sites nominated by the authority.

In accordance with the ten commitments of the mobile operators association MOA the site was rated according to the traffic rating model. Details of the traffic light rating are included with the application.

A traffic light rating of green was given. The consultation methods agreed were

- Letter to Local Planning Authority
- Letter to Aldingbourne Primary School (within 150m of the proposed site)

There were no responses received from our pre-application consultation letters.

5 Need for the Site Technical Justification

This is an essential installation for T -Mobile UK Ltd required to provide coverage for the surrounding area of Westergate and the principle routes as a component of the wider network across the UK.

Modelling Plots illustrating the predicted levels of coverage are included with this application. It should be noted that these are computer predictions that do not take into account any attenuation of the signal that may be caused by buildings, ground features and local tree heights.

2G(GSM) Plots

Plots Ref (50993) indicates the network coverage in the area and gap in coverage that this site seeks to fill.

Plot Ref (50994) this indicates the coverage that is achieved from the site in isolation

Plot ref (50995) Shows how the site relates to the existing/proposed network and will in combination with this site provide the required coverage to area and the required overlapping within the existing/proposed sites.

3G UMTS

Plot ref (50999) indicates the network coverage in the area and gap in coverage that this site seeks to fill.

Plot Ref (51002) this indicates the coverage that is achieved from the site in isolation

Plot ref (51003) Shows how the site relates to the existing/proposed network and will in combination with these sites provide the required coverage and overlapping of the existing sites

These plots clearly indicates how this proposed base station will resolve the lack of coverage in this area and will enable a continuous service as people move from cell to cell in the network.

PPG8 also states in Para 22 of the Annexe. 'These systems are demand-led. Increase in the use of mobile phones has meant that operators are continually expanding their networks to

accommodate customer requirements of service and quality. The greatest need for base station sites is usually in built-up areas where there is the greatest density of mobile users, and within a mile or two of the main roads, where the demands on network capacity are greatest'.

6 Alternative Sites

The extent of the search area is indicated on the enclosed Search Area Map. To ensure optimum coverage and to avoid the need for additional base stations the site needs to be located within this search area.

In accordance with the sequential approach outlined in PPG 8 the following search criteria have been utilised. Firstly consideration was given to sharing any existing telecommunication structures in the area secondly consideration was given to utilising any suitable existing structures or buildings and thirdly sites for freestanding ground based installations

a) Mast and Site Sharing

In compliance with its licence and the sequential approach outlined in PPG8 T -Mobile attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution.

The Ofcom Site Finder mast register and the Local Planning Authorities mast register (where they have one) have been examined.

There were no existing telecommunication masts to share with within the search area.

b) Existing Buildings Structures

D3 The Wilkshead Public House, Nyton Road, PO20 3UG

NGR: 493900, 105575

This site was considered for a rooftop installation however the roof was found to be unsuitable for the antennae and there was no space for the equipment cabinets associated with the development at ground level. It was also too far out of the coverage area.

D7 The Prince of Wales Public House, Lidsey Road, Woodgate, PO20 3ST

NGR: 493665, 104275

This site was considered for a rooftop option, however it was out of the coverage area.

D4 Westergate Community School, Lime Avenue, PO20 3UE

This school was considered for a rooftop option. The site is in the preferred coverage area, however from our surveys it was determined that a mast of approximately 6m would be needed on the roof of this building to meet the coverage needs. Therefore it was discounted as it was felt that this would be visually intrusive. Although not a material planning reason it was also discounted on the basis that it may cause community concerns.

c) Ground Bases Installations

D1 Power Tools Factories, Fontwell Avenue (A29) PO20 3RR

NGR: 494345, 105990

This site was considered for a ground based option however it was discounted as the landlord was not willing to accommodate telecommunications at the premises. It was also discounted for being far too north of the coverage area.

D2 SRC Recycling, Fontwell Avenue

NGR: 494560, 105685

This site was considered for a ground based mast however it was too far north of the preferred coverage area, and therefore was discounted.

D5 Nyton House Residential Home, Nyton Road, PO20 3UE

NGR: 493425, 105630

This site was considered for a ground based mast however it was too far north of the preferred coverage area. The site is also surrounded by tall trees which would inhibit the signal.

D6 Lees Yard, Lidseys Road A29, PO20 3SU

NGR: 493842, 104115

This site was considered for a ground based option however it was too far south of the preferred coverage area and was therefore discounted.

D8 Nyton Road, Eastergate, PO20 3UN

NGR: 494045, 105603

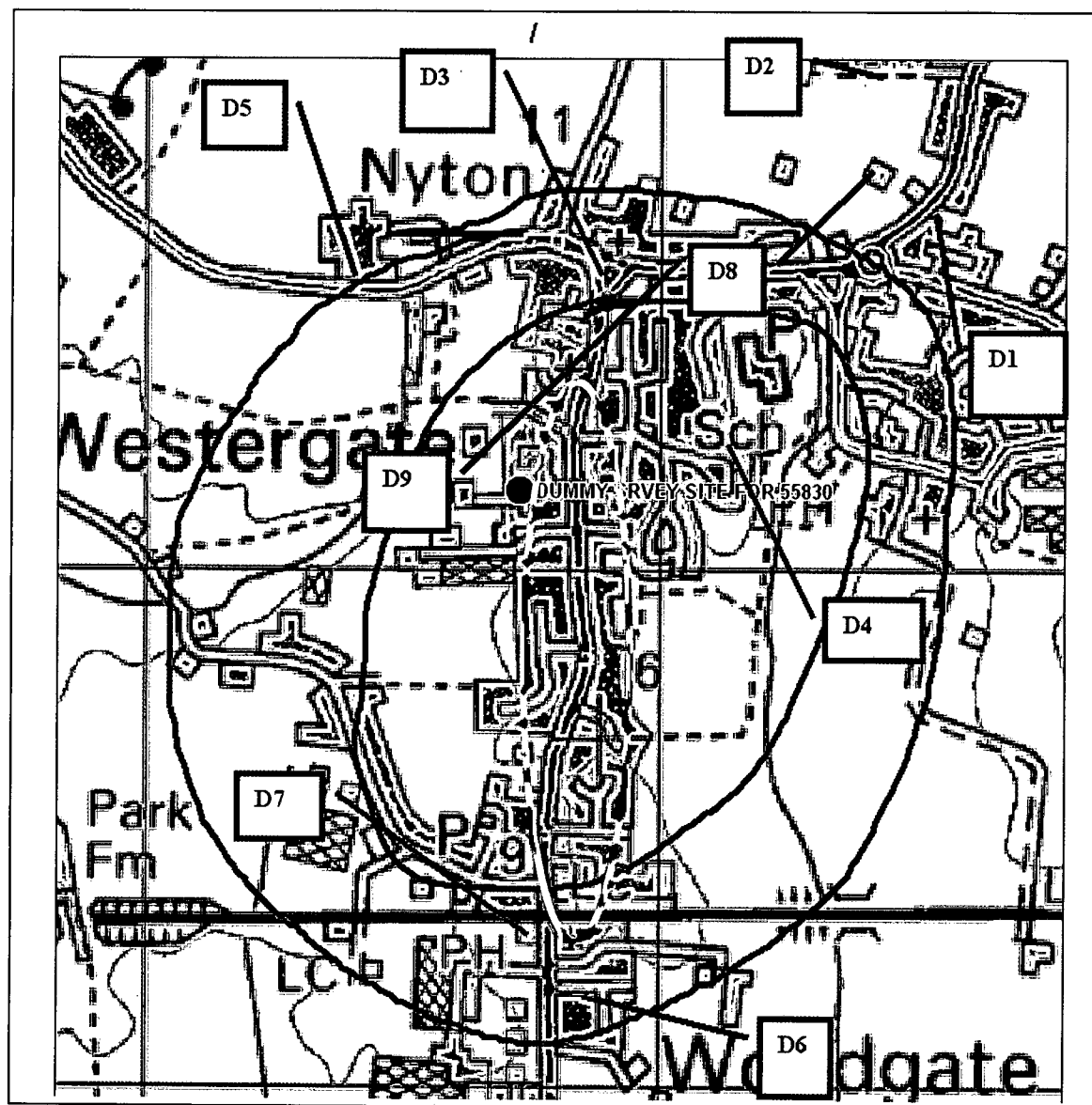
This road was considered for a street works type installation but it was too far out of the coverage area and was therefore discounted.

D9 Hill View Farm, Fontwell Avenue, Eastergate, PO20 3UW

NGR: 494230, 103670

This site was considered for a ground based option however it was too far north of the preferred coverage area and was therefore discounted.

A map showing the discounted options can be seen below. The blue and green circles indicate the original search area however the inner yellow circle is the actual coverage gap.



7 Planning Policy Framework

Development Plan

The relevant local plan is the Arun District Council Local Plan (Adopted 2003). The relevant policy is Dev 41.

Policy DEV41 Telecommunications is below: -

Planning permission will be granted for telecommunications development provided that it is demonstrated that careful consideration has been given to possible sharing of sites or use of existing buildings or structures, and that there are no satisfactory alternative sites available, and the following criteria are met:

- (i) **Development will not be permitted within the Area of Outstanding Natural Beauty, Sites of Special Scientific Interest or Conservation Areas unless the developer is able to demonstrate a sequential approach has been taken and that there are no suitable alternative locations. Under such circumstances considerable weight will be placed on good design and landscaping to minimise visual intrusion. Elsewhere, proposals should not harm local amenity.**
- (ii) **The use of conditions or planning agreements will be considered to secure landscaping, as well as restoration of the site once operations have ceased.**
Where prior notification is required, the Council will require developers to demonstrate what attempts have been made to minimise impact through appropriate siting and design.

Reason

To protect the best and most sensitive environments, whilst allowing for the efficient development of the telecommunications network.

Informative

Mobile phone base stations will be required to meet ICNIRP guidelines for public exposure. Operators may be expected to provide evidence regarding the need for the proposed development.

We consider in compliance with this policy that we have taken all appropriate steps to minimise the impact of the development as detailed below:-

We have carried out as demonstrated in the section on alternative sites a full assessment of the area and shown there are no existing telecommunication sites available to share within the required coverage area and that there are no buildings or structures that are suitable or available to T Mobile, accordingly the only remaining option is for a ground based mast.

We consider of the sites available the location proposed is the most suitable to minimise any visual impact as it forms a busy road with numerous items of street furniture such as 10m lampposts and against a line of trees approx 8-9m high. All features which with their existing vertical emphasis will assist in the assimilation of the development into the street scene.

The telegraph pole design while being slightly taller than the existing lampposts was chosen as this will reflect the slim line vertical nature of the existing lampposts in the street scene ensuring it will not appear as an isolated or incongruous feature and thereby assisting in visual assimilation into this street scene.

The trees to the rear of their site with their strong vertical emphasis will further ensure even when they are not in leaf that any impact of the site is further reduced.

This assimilation will be further enhanced by the enclosure of the antennas within the shroud ensuring the proposal will not be readily apparent as a telecommunication installation.

We consider therefore that this design of pole in this location will not unduly contrast with the surrounding townscape and will meet the public's visual expectation of the areas ensuring it will not form an intrusive feature in the street scene

As advised as the radio housing equipment cabinets are under 2.5 cubic meters in volume we consider they should not form part of your consideration when assessing this application. However if you disagree with this stance we contend that they form features appropriate to busy roads such as this.

With regard to any potential concerns over impact on the residential amenities of the adjacent properties we would make the following comments.

We contend that the distance of the installation from these properties of approximately 40m at its closest point will by itself ensure there is no adverse impact on the residential amenities of local residents (that are material-planning considerations namely, it will not have an overbearing or overshadowing impact and will not generate adverse noise or pollution).

In addition to these factors we are proposing a slim line monopole structure design, which will be viewed in the context of the existing street furniture the 10m high lampposts and the nearby trees.

We would not dispute that the occupiers of the property will have limited views of the site from their dwellings. However, we would comment that it is well established in planning guidance that there is no right to a view for occupiers and this cannot be a material planning consideration, as it is a matter of private not public interest. As advised in PPS 1, it is not the purpose of the planning system to protect private interests.

We consider that the development is compliant with the council's policy and that in accordance with Section 38 (6) of the Planning and Compensation Act 2004 permission should be granted for the installation.

The relevant structure plan is the West Sussex Structure Plan 2001 – 2016. The telecommunications policy is NE23 as follows:-

- (a) Development which facilitates the growth of new and existing telecommunications systems should be permitted provided that: there is a demonstrable need; priority is given to the use of existing buildings or structures; and the sharing of existing masts and sites; and the impact on the environment is acceptable. Development within an Area of Outstanding Natural Beauty should not be permitted unless no alternative site (which meets operational or technical requirements) is available outside the Area or within the Area but which has less impact on the environment. Development which would interfere with existing broadcast and other telecommunications services should not be permitted.
- (b) Local Plans should include policies to:
 - (1) Enable the efficient development of new and existing telecommunication networks taking account of the principles in (a) and technical or operational requirements
 - (2) Where appropriate, allocate sites for major telecommunications development; and
 - (3) Prevent development which would interfere with the reception of existing broadcast and other telecommunication services.

We believe that the development is compliant with the structure plan telecommunications policy as the sequential approach has been followed in the site searching process and there were not any masts or sites to share with in the search area. The site is not in an AONB and will not interfere with existing broadcast and other telecommunications services.

National Guidance

National policy with regard to Telecommunications development is found within Planning Policy Guidance Note 8 Telecommunications 2001

This advises in Para 1 of Appendix 1 'Modern telecommunications are an essential and beneficial element in the life of the local community and the national economy

Specific Policies

New mast

Although PPG8 stipulates that use should be made of existing buildings or structures to site new antennas there were none that satisfied our technical requirements.

Innovative Design Solutions

PPG8 encourages authorities and operators to work together and use sympathetic design and camouflage to minimise the impact of development on the environment. Particularly in designated areas the aim should be for apparatus to blend into the landscape. The telecommunications industry is encouraged to continue to develop innovative design solutions, in terms not only of the structure of masts and antennas but also the materials and colouring (Paragraphs 24 and 25 – PPG8).

We have proposed a slim monopole disguised as a telegraph pole reflects the acknowledgement in PPG8

8 Health and Safety

The public perception of health risks can be material considerations within the land use planning systems. The weight to be attached to this issue has to be determined accordingly in each case. However, it has been held and widely established at planning appeals and in recent high court cases that health considerations alone are not sufficient basis for withholding planning permissions, notwithstanding any views the Council may have adopted about current research, providing it has been demonstrated that the proposed installation will comply with ICNIRP guidelines.

The requisite ICNIRP certificate is submitted with the application confirming that the emissions fall within the required guidelines.

The most recent government advice concerning mobile phone technology and health concerns about them is contained in the revised PPG 8 (2001), which states:

Para 98 It is the Government's firm view that the planning system is not the appropriate mechanism for determining health safeguards. It remains central government's responsibility to decide what measures are necessary to protect public health. In the Government view if a proposed development meets the ICNIRP guidelines for public exposure it should not be necessary for a local planning authority in processing an application for planning permission or prior approval, to consider further the health aspects or concerns about them.

In response to the recommendations of the report entitled 'Mobile Phones and Health' (2000) prepared by the 'Independent Expert Group on Mobile Phones' (IEGMP) and PPG8 (August 2001). The proposed telecommunications apparatus that is subject of this application is designed to be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP), as expressed in the EU Council recommendation of 12 July 1999 "on the limitation of exposure to the general public to electromagnetic fields (0 Hz to 300 GHz)". In this

instance, we believe that it is not necessary to consider health effects further as recommended by PPG8.

We would also draw attention to the National Radiological Board report of January 2005. Their report, Mobile Phones and Health 2004, which is a follow up evaluation to the 2000 report, reiterated that the balance of evidence indicates that there is no general risk to the health of people living near to base stations, where the exposures are only a small fraction of the established guidelines.

In addition to these factors the basic principle of the governments approach to health issues outlined above as been tested at appeal and in both the High Court and the Court of Appeal) T-Mobile Auk, Hutchison 3g, Orange Personal Communications Services –v- First Secretary Of State & Harrogate Borough Council.2004) In each instance the case was dismissed This clearly establishes that when evidence is submitted to confirm that an installation fall within the ICNIRP guidelines that a perception of fear or concerns about health issues doe not provide justification for a council to refuse an application

9 Conclusion

We consider the development complies with government guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community while minimising visual impact.

We consider taking into account the factors of technical constraints, available sites and planning constraints that this site and design clearly represent the optimum environmental solution.

Any minor visual impact the site may have will be outweighed by the many benefits that telecommunications bring to the economy and community.