



**SUPPLEMENTARY INFORMATION IN SUPPORT
OF
APPLICATION FOR PLANNING PERMISSION**

March 2019

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

Site Ref. MBNL: ARN022, Fitzleet House

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Fitzleet House	Site Address:	Fitzleet House, Queensway, Bognor Regis, West Sussex, PO21 1QS
NGR:	E 493423, N 099109		
Site Ref Number:	MBNL, ARN022	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:	28/02/2019	
Name of contact:	N/A	

¹ Macro or Micro
DAL-UK-PRO-004T-036
Version Two

Summary of outcome/Main issues raised:

A consultation letter and associated plans were sent to Arun District Council on 19/02/2019. At the time of writing, no consultation response had been received.

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline Consultation carried out: The proposal was rated as Amber in accordance with guidelines set within the Code of Best on Mobile Network Development (published 2016). Accordingly, pre-application consultation was undertaken with the Ward Members for Marine and with Bognor Regis Town Council.			
Summary of outcome/Main issues raised: At the time of writing, the only consultation response was from Bognor Regis Town Council that wrote to advise: <i>'Having considered the proposals for telecommunications site upgrade at Fitzleet House, Bognor Regis, the Town Council have no comments to submit.'</i>			

School/College

Location of site in relation to school/college: The site is not located near to any educational facilities.
Outline of consultation carried out with school/college: N/A
Summary of outcome/Main issues raised: N/A



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
Details of response: NA		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	21/03/2019	

3. Proposed Development

The proposed site:	
The application site is the rooftop of a high-rise residential tower block named Fitzleet House. The tower block is located in Bogner Regis town centre where surrounding land uses are a mixture of residential and retail. The site presently accommodates multiple pieces of telecommunications apparatus on the building's rooftop. This includes radio antennas, transmission dishes and supporting infrastructure. Collectively this apparatus forms a base-station providing mobile communication services to customers on the Everything Everywhere and Three networks.	
Type of Structure:	
Description: Replacement of 6No. antennas on building roof-top with 1No. 10m high stub-tower supporting radio apparatus, plus ancillary works.	
Overall Height:	
Height of existing building:	N/A
Equipment Housing:	
New equipment housing cabinets of modest size will be installed within existing roof-top cabins. The cabinets do not form part of this planning application.	
Materials:	
Tower/mast etc – type of material and external colour:	Mast to be galvanised-steel finish and antennas to be coloured white, same as existing.
Equipment housing – type of material and external colour:	N/A

Reasons for choice of design:

The antennas and other radio apparatus would be affixed to a 10m high steel stub-tower which would be secured to the building's roof-top. The radio apparatus must be elevated above the host building, and other structures in the surrounding area, to prevent signal interference.

The larger size of the replacement antennas, a result of their higher capability, necessitates the need for them to be elevated at a higher position relative to the existing. Face-mounting the antennas onto the building's walls was considered but ruled-out because of a failure to meet radio requirements.

The antennas need to be sited reasonably close to the equipment cabinets that they will be connected to in order to avoid impractically long cable feeds and the associated electrical losses. The cabinets would be located within existing roof-top cabinets and would not be visible from ground-level.

It is intended that that there would be minimum intrusion into the fabric of the building and all equipment could be removed from the site if no longer required, making the proposal reversible. Service personnel would continue to access the roof-top via the existing stair-case and doorways which serve the building. There would be requirement for alteration to parking arrangements.



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



Fig 2. Location of proposed stub-tower. Source: Bing Maps.



Fig 3. Street-view image of host building. Source: Google.

4. Technical Information

	Yes	No
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, 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. 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.		

5. Technical Justification

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

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.

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

As the proposed works are to upgrade an existing telecoms site, the application omits the identification of any other sites in the area. This is consistent with the government's policies, as stated in national planning policy, to keep the number of base-station sites to a minimum and to site apparatus onto existing structures as oppose to installing additional ground-based masts.

Land use planning designations:

Development Plan

The application must be determined in accordance with the authority's statutory development plan which is the Arun Local Plan 2011-2031 (July 2018).

The application site falls within the following land allocation:

'Policy EMP SP2

Economic Growth Areas

The Council will work with partners to enhance local employment opportunities within the following Economic Growth Areas identified on the Policies Map:

- a. Littlehampton Economic Growth Area; and*
- b. Bognor Regis Economic Growth Area*

Knowledge and cultural based employment as well as retail, leisure and office developments will be directed to the Economic Growth Areas to promote their vitality, viability and regeneration. The Council will support development of an appropriate scale in other settlements in the District to diversify and enhance the knowledge and cultural based opportunities.'

'Bognor Regis Economic Growth Area

Within the Economic Growth Area, the redevelopment of two town centre sites owned by the District Council (The Regis Centre and Hothampton Car Park), along with improvements to the public realm, will be a key priority.

Development which promotes the establishment of a cluster of creative and digital start-ups in Bognor Regis will be supported, as will improvements to tourist accommodation and facilities...'

The following sections from the local plan are also particularly relevant to the proposal:

'Policy TEL SP1

Strategic delivery of telecommunications infrastructure

Direct access to high quality communications infrastructure, including superfast broadband, is required to promote economic growth and to improve access to goods and services and opportunities to work from home.

All proposals for new residential, employment and commercial development must be designed to be connected to high quality communications infrastructure to ensure that fibre optic or other cabling does not need to be retrofitted.

Where relevant, evidence to show that development cannot be directly connected to high quality communications infrastructure due to viability or technical reasons, must be provided.

Where the installation of electronic communications equipment and cabinets is required to deliver high quality communications infrastructure there will be a presumption in favour of their development, subject to criteria set out in the Telecommunications Development Management Policy and other Local Plan policies.'

'Infrastructure, Developers' Contributions and Viability

22.1.1 The maintenance and enhancement of existing infrastructure and the provision of new infrastructure is required to support Arun's vision for growth and the changes set out in this Local Plan. Ensuring that both existing and new residents and visitors are able to access the services that they require without undue inconvenience or needing to travel long distances. In turn meeting both the sustainability appraisal and strategic objectives of the Plan.

22.1.2 The types of infrastructure needed will cover a wide range of local facilities and services and should include facilitation to ensure establishment of the following... Utilities including communications'

Proposal assessment

In considering the development proposal, a key consideration is the balance of protecting the visual amenity of the surrounding area while also enabling the population and economic growth ambitions of Bognor Regis to be suitably served by the latest electronic communication services.

Landscape and visual

It is assessed that the principle public viewpoint towards the site are from Queensway – the highway which passes to the north and east of the site. When considering the landscape and visual change from this location, it is observed that views of the building when commuting north are only partial due to a parade of shops creating a screen. The mast would also not be highly visible when commuting south due to the proposed site layout which would see the mast set-back from this side elevation. The high-level nature of Fitzleet House means that the installation would not be in eye-view by pedestrians passing the site at street-level.

It should be recognised that the presence of radio equipment on Fitzleet House has been a long-term feature and that the upgrade proposes to modify this equipment. The proposed 10m high stub-tower should not appear out of place in the context of a building that is over 45m high and of considerable overall scale. It is also material that the building would not generally be considered to be of architectural or historic significance. It is assessed that the resulting magnitude of visual and landscape change would be low to moderate.

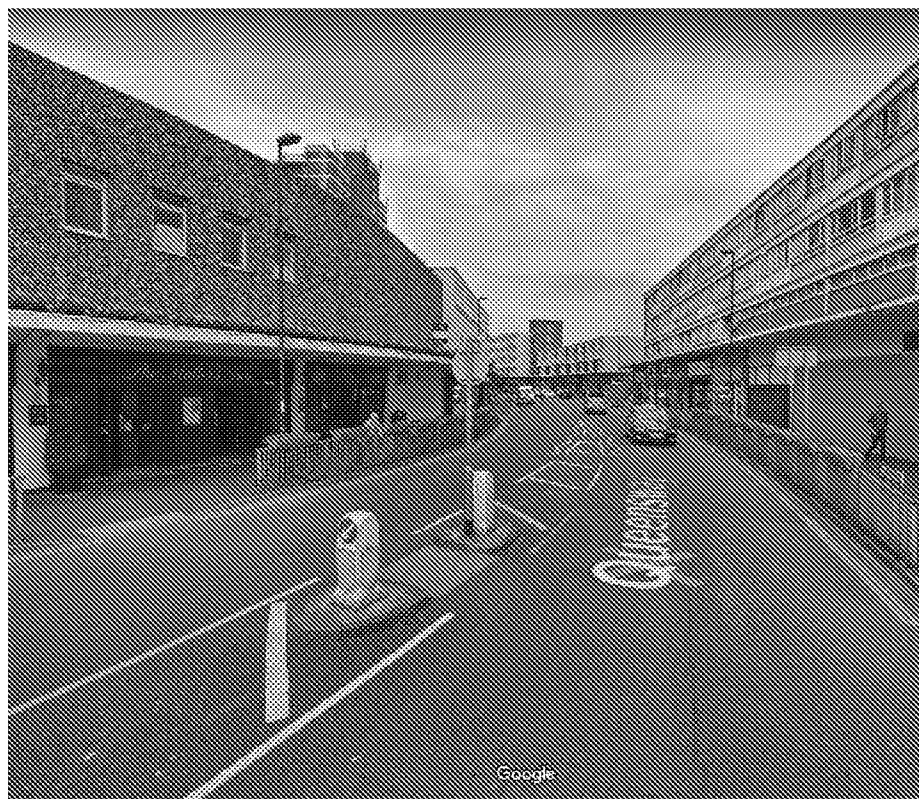


Fig 4. Street-view image of host building from Queensway, facing north. Source: Google.



Fig 5. Street-view image of host building from Queensway, facing south. Source: Google.

Material benefits

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

Bognor Regis is one of only two 'Economic Growth Areas' identified in the Arun Local Plan. There is a policy to regenerate the town through... *'Knowledge and cultural based employment as well as retail, leisure and office developments'*.

In order for the town to attract new business, residents and general investment, it must be able to compete with other towns and cities which means providing access to the latest communications services. The upgrade of this base-station would see its capacity increased enabling it to help meet current and future demand for services. Access to reliable and advanced communication services is particularly important in light of the aspiration to establish... *'a cluster of creative and digital start-ups'*.

Paragraph 22.1.1 of the Local Plan directly acknowledges that the upgrade of infrastructure is essential in realising the borough's future vision... *'The maintenance and enhancement of existing infrastructure and the provision of new infrastructure is required to support Arun's vision for growth'*.

The proposed upgrade would provide the infrastructure described in Policy TELSP1 where it is established that... *'Direct access to high quality communications infrastructure, including superfast broadband, is required to promote economic growth and to improve access to goods and services and opportunities to work from home.'* The policy goes on to establish that there is a 'presumption in favour' of development proposals that delivery of high quality communications infrastructure. The proposed upgrade of this mobile base-station would certainly meet the description of 'high quality communications infrastructure' and would therefore have a presumption in favour of approval.

Furthermore the upgraded base-station would be 5G ready which means that when these services come online, 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.

It is also 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.

The development plan is unambiguous in its support the provision of high quality infrastructure. This proposal would see existing infrastructure upgraded to enable provision of the latest electronic communication services. The upgraded roof-top base-station 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. This approach of site sharing and siting equipment onto buildings, as oppose to establishing ground-based masts, is in accordance with local planning policy. It is considered that the benefits of the proposal would outweigh the resulting visual changes.

Additional relevant information:

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 – Supporting high quality communications

The NPPF, para. 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.**'*

Para 113 continues:

*'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 116 clarifies that:

'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.'

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.**'*

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 with ultrafast connectivity. 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 establish Bognor Regis' 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 site sharing arrangement. This approach is fully in accordance with the NPPF.

In considering the development proposal, a key consideration is the balance of protecting the visual amenity of the surrounding area while also enabling the population and economic growth ambitions of Bognor Regis to be suitably served by the latest high capacity infrastructure.

This statement has aimed to demonstrate that proposal would result in a low to moderate 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.



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