

UPGRADE OF TELECOMMUNICATIONS INSTALLATION

FOR

MBNL, EE UK LIMITED & 3 UK LTD

AT

Existing Installation

Southern Water Pumping Station

Off Amberley Drive

Ferring

Worthing

BN12 4QJ

SUPPORTING STATEMENT

August 2017

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MBNL REF: Cell Number 20709

1. Introduction

This statement is in support of a Planning Application in respect of a proposed upgrade of an existing base station installation.

The upgrade is urgently required to provide improved coverage and capacity from the installation, and to allow the deployment of the new Emergency Services Network (ESN).

2. The Proposal

The scheme planned at this location is as follows:

- Replacement monopole, replacement antennas (and associated Mast Head Amplifiers), and 1 no. replacement small cabinet at EE Site 20709 – Existing monopole, off Amberley Drive, Ferring, Worthing BN12 4QJ
- The scheme is required for four principal purposes:
 - To increase the height of the installation in order to prevent signal blocking from surrounding trees, both in the immediate and wider environment
 - Provide improved 2G and 3G services for EE
 - Provide for forthcoming 4G services
 - Allow the deployment of the new Emergency Services Network (ESN)

There is an essential need here to retain the existing site, while in upgrade terms, given the ability to utilise an existing site, no other options were realistically considered. As such, the preferred EE and 3 UK option is as follows:

- The replacement of an existing 12m monopole with a new 15m monopole, together with the installation of 3 no. replacement antennas (and associated equipment), and 1 no. replacement small equipment cabinet and associated ancillary development at Ferring Pumping Station, Amberley Drive, Ferring (NGR: 510106, 101827)
- This is the preferred option as the scheme will utilise the existing site. The current installation accommodates an outmoded range of antennas, which have limited range, and penetration, and are not capable of hosting modern 3G and 4G services. In addition, the scheme seeks to prepare the installation for 4G services due in the near future.
- The increase in height is required to ensure proper performance and coverage by the new antennas, and to overcome some blockage that is currently being presented by trees in the area.
- Still further, there is a requirement to bring the new Emergency Services Network (ESN) on to site

4. The Application Site

The current installation is located at the site of a pumping station, in a relatively remote location, on the edge of Ferring, and located some distance from any residential areas in the locality. It is screened by some localised tree cover and is in a location that has been utilised for telecommunications use for some time. It is therefore well established, and lends itself to further use without any significant detriment to the local area or amenity.

Critically, although the height of the structure will increase, the surrounding trees will continue to provide significant screening. It is also located generally away from public views and thoroughfares, and we believe that the visual impact will be modest.

It should be noted that the scheme has changed from the original proposal, such that the replacement structure is now more slim, and the location has been revised in order to take better advantage of the tree screening when viewed from the south. These changes have been requested, and actioned, based on comments received from Arun Council (see below)

4. Pre-Application Consultation

An original formal pre-application enquiry was submitted on 11th January 2017, in relation to a proposal to replace the existing telecommunications 'telegraph' pole. This is essential in order to provide significantly improved coverage and capacity, to allow for 4G services, and critically to allow the deployment of the new Emergency Services Network (ESN).

On 3rd February, Arun Council responded (enquiry reference PAA/1/17). Although accepting the need to upgrade, and that an increase in height would be acceptable, concern was expressed in relation to the overall width of the new structure.

These comments were relayed back to the operator, and further consideration was given to a possible alternative design. On 19th May, a revised scheme was submitted, with the following comments:

"I refer to the above original enquiry, and the concerns expressed in your formal response dated 3rd February.

The major concern was the increase in width of the pole and overall structure, and this has been fed back to my clients to investigate a better solution. The result of this is as per the attached.

In considering this, I would be grateful if you could take the following into account:

- The revised replacement pole design is slimmer than the original proposal, both in terms of the support structure and the antennas clustered at various points around the new structure. We believe the overall impact should thus be significantly decreased*
- This revision is termed a 'Mini Macro 4' design, and is only deployed where it essentially a last resort, as there are some technical drawbacks. It represents the least obtrusive structure available to EE in this case.*
- The site is being upgraded from 2G/3G only (2100) to 3G/4G (800/180/2100/2600). In addition (and this is something I did not appreciate previously), the site will also accommodate ESN (see below). As such there is a requirement to install 18 feeders through the column where only 6 were previously required. There is no design solution available similar to the current replica telegraph pole that could carry these technologies on the required antenna bearings to achieve the required coverage. The Mini-Macro solution is the only 'lightweight column' that can provide the necessary solution*
- ESN is the new Emergency Services Network, which is replacing the Airwave network. Coverage to a significantly wide area (and generally wider than might be required for*

simple commercial purposes) is essential. This is one of the reasons why a height of 15m is required. I have attached some information regarding the new ESN network

I would be most grateful for your early feedback in this matter, and am happy to supply any further information that you might require."

Arun Council commented that the revised scheme represented a visual improvement, but enquired as to whether the location of the new pole could be amended, in order to take advantage of the existing tree cover, particularly when viewed from the south. Following further consultation with the operators, this has now been agreed and actioned, and the resultant further revised scheme is as per this application

Please note that we have also consulted with Ferring Parish Council. On the 19th January, Ferring Parish Council, commented, and in particular were concerned in relation to the overall height, and whether this could be overcome by reducing the trees adjacent. On the same date, a response was issued as follows:

While I need to take up some of these matters with my clients, the following might help to clarify some issues.

- *While the height of the trees is undoubtedly an issue, there is also a need to ensure greater coverage, capacity and reach, particularly as 4g is planned. My understanding is that this requires a height increase.*
- *In terms of the trees, I think both my clients and the council would be keen to maintain as much screening as possible, and would thus be reluctant to make any substantive changes to the trees on site.*
- *The nature of the new structure is a function of the need to support the new, more modern antennas. These are necessarily larger than those that currently exist on site, given their need to serve two operators across all technologies, thus the support structure needs to be more robust.*

As above, the scheme has been revised since these earlier comments, and which we hope addresses most of the points raised.

5. Application Background

The existing site and installation has been established since 2001, thus the monopole and site has been utilised for telecommunications purposes for some significant time.

Although the installation provides network services to significant parts of the local area, including Ferring and Goring, it is limited in terms of its coverage and capacity, while the equipment installed is outmoded in terms of modern network services and technologies. The limited height of the existing pole is also an issue given the tree cover in the area, and the need to provide the widest service..

There is now a requirement to bring in modern equipment for up to date technology and services, while a structure upgrade is required to provide for these improvements and to ensure

vitality improved network services. In addition, this site is planned as part of the new Emergency Services Network (ESN)

6. The Need for the Proposal

This scheme represents a critical upgrade of an existing site in order to provide improved network coverage and capacity, and to expand EE's services, notably in the provision of broader 4G services. At the same time, it is vital to be able to bring the new Emergency Services Network (ESN) on to site.

The only feasible, practical and available solution is to increase the height of the installation to 15m overall, and to provide for a more robust structure that can accommodate all the network and service requirements. This can all be achieved at a location that is an established telecommunications site.

EE, 3 UK and Wireless Infrastructure confirm that the only realistic solution is a replacement pole at an increased height. A 15m structure here is critical to ensure:

- Improved coverage and capacity across the target area for all technologies
- Complete clearance of all the local tree cover
- Effective coverage for the new ESN network

The design is the slimmest solution available, given the increased height, wind loading and need to accommodate antennas to serve all 3 technologies, together with ESN. Please note that the structure has been revised, and indeed moved to a different location, following consultation with Arun Council, as above.

7. Site Search/Alternatives Discounted

As this is an upgrade of an existing installation, no alternative sites were realistically considered. Upgrading an existing installation is preferable to the alternative of seeking to deploy a new site or installation.

8. Design Statement

The scheme meets all relevant criteria and guidance on design in that it seeks to upgrade an existing installation by way of the replacement of an existing monopole with a new monopole, together with the installation of 3 no. replacement antennas. Its height and overall design is dictated by the coverage, service and technology needs.

The current installation is located at the site of a pumping station, in a relatively remote location, on the edge of Ferring, and located some distance from any residential areas in the locality. It is screened by localised tree cover and is in a location that has been utilised for telecommunications use for some time. It is therefore well established, and lends itself to further use without any significant detriment to the local area or amenity.

Critically, although the height of the structure will increase, the surrounding trees will continue to provide screening. It is also located generally away from public views and thoroughfares, and we believe that the visual impact will be modest.

Please note that following consultation with the planning department of Arun Council, the following changes have been made:

1. The overall width and bulk of the structure, and the means by which the antennas are attached to the pole, have been revised, so that the appearance is less obtrusive than the original plan
2. The location of the pole has been moved slightly north west, in order to take better advantage of the tree screening when the site is viewed from the south

We have also commissioned a range of photomontages which we believe demonstrate the modest impact of this upgrade, particularly give the relatively distant views from public access points in the area. These photomontages are included with this application.

9. Access Statement

Radio base stations are not designed to be accessible by the public. Therefore no specific public access provisions are required to be incorporated into the design of the proposal.

10. Health and Safety

We would remind the Council that the Government has set out its clear view on the issue of health and perceived view of health risks in paragraph 46 of the NPPF:

“Local planning authorities must determine applications on planning grounds. They should not...determine health safeguards if the proposal meets International Commission guidelines for public exposure.”

As above, and included within this application, EE have confirmed this installation will be fully ICNIRP compliant. This, of course, takes full account of the adjoining development, and the essential increased height of the EE installation required to ensure continued compliance.

11. Planning Policy Framework/Development Plan Policy

National Guidance

The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these should be applied. The main thrust of the guidance is a presumption in favour of sustainable development. In general terms in respect of telecommunications the guidance aims to promote sustainable transport (including the need to travel), build a strong and competitive economy, and seeks to secure high quality design.

Relevant extracts from the NPPF are as follows:

42. Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.

43. local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate

46. Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure

This application includes the requisite ICNIRP certification.

It is considered the proposed development complies with the broad aims of the NPPF. It assists in the aim to keep the number of installations to a minimum, by providing enhanced coverage and capacity from an existing installation. The equipment has been sympathetically designed and it would enhance the provision of local community facilities and services

In addition, the recently revised Code of Best Practice (November 2016) also emphasises the government's commitment to improved communications infrastructure and coverage. Relevant extracts from this document are as follows:

1.3 The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development.

2.1 The continued expansion and development of mobile networks is a key element of the National Infrastructure Delivery Plan 2016 – 2021. This recognises that digital communications are now a crucial component of everyday life, with improvements in connectivity being key to a vibrant economy.

2.2 Consumers, businesses and public bodies increasingly rely on mobile communications and expect to receive a signal wherever they are. Coverage in rural areas is recognised as a vital component for maintaining economic activity and social inclusion.

2.3 Recent changes in planning policy [and regulation] are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed.

2.4 The National Planning Policy Framework ('NPPF') acknowledges that high quality communications infrastructure is essential for sustainable economic growth and sets out the Government's planning policies for England, and how they are expected to be applied.

2.5 The NPPF advises that the purpose of the planning system is to contribute to the achievement of sustainable development, which it states has three dimensions: economic, social and environmental and that local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.

3.3 The NPPF is clear that local planning authorities should not seek to prevent competition between operators or question the need for the telecommunications system. The systems tend to be demand-led or to fulfil coverage obligations. With the ever increasing demand for data hungry applications available to a range of connected devices, such as smart phones and tablets, the requirement to upgrade and improve networks through changes to existing sites and the development of new sites is constant. As most parts of the country move onto a superfast highway, so the need to bring coverage to 'not spots' (i.e. areas where there is no mobile coverage from any operator) and improve coverage in 'partial not spots' (i.e. where there is some coverage, but not from all operators) intensifies.

5.8 The mobile telecommunications network is a crucial piece of national infrastructure in economic, community and social terms. However, it is delivered locally, with planning permission, where applicable, being decided by the local planning authorities of England.

5.9 Increasing consumer demand, especially for data is putting demands on mobile operators for improved connectivity and more capacity on their networks. This is driven by the widespread adoption of smartphones and the rapid uptake of tablet devices, and the way consumers are now using them, often choosing to do so when they have a fixed connection available. In addition, the Government has ambitious aspirations for improving connectivity and coverage, especially in rural areas. All these factors result in the need to continually upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely.

It is our view that this particular scheme falls squarely in line with the above guidance and policy

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The current applicable policy is contained in the Arun District Local Plan 2003 (Saved policies). In relation to this plan, saved policy DEV41 is applicable. We believe that this scheme fits the adopted and saved policy as follows:

POLICY DEV41 Telecommunications

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 – **the site is not located within any of the designated areas. In relation to local amenity, we have altered both the design and location of the scheme in order to ensure compliance, as far as is practicably possible, following consultation with Arun Council. It should also be noted that this site accommodates two operators (EE Ltd and 3 UK Ltd), while it is also planned to accommodate the new ESN Network.***

(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 – **As above, both the siting and design have been amended in order to minimise impact, following consultation with Arun Council.***

The new Local Plan 2011-2031 was previously in examination, but that process was suspended in February 2016. We understand that modifications to the new plan have now been proposed, and that these have been the subject of local consultation during April and May 2017. It is further understood that the examination of the plan has very recently resumed.

We particularly note the following, although these policies have yet to be fully examined or adopted:

- Policy TEL SP1 - Strategic delivery of telecommunications infrastructure states, *“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.... 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”*
- Policy TEL DM1 – Telecommunications – the provisions of this lengthy policy continue to emphasise the principles of mast/site sharing, careful design, minimising impact and ensuring ICNIRP compliance. In relation to this scheme, as above, changes have been made in relation to siting and design, following consultation with Arun Council, to ensure, as far as practically possible, that the impact on the local

area is minimised. In addition, the application includes the requisite ICNIRP certification

We are also aware of the adopted Ferring Neighbourhood Plan 2014-2029. There is no specific reference within this plan to communications development, but we note Strategic Objective 4 which seeks to *'offer greater protection to the village's surrounding countryside, coastline, heritage assets and special character'*. This is principally aimed at inappropriate development outside the existing built up area boundary, but we believe that the scheme that is planned in this application still very much respects the principles of the Neighbourhood Plan.

We are also aware of a Telecommunications SPG, although this now dates from 2000, and thus will not take account of current guidance and legislation. Notwithstanding this, it too puts an emphasis on using existing sites and structures, whilst minimising the impact on the local area, albeit subject to technical constraints.

12. Conclusions

This scheme represents a critical, vital and essential upgrade of an existing site in order to provide improved network coverage and capacity, and to expand EE's services, notably in the provision of 4G services in this locality. In addition, there is a requirement to deploy the new Emergency Services Network (ESN) to this site. Network planners have identified a need for improvements of this nature, and the proposed development will address this identified need and continued requirement in line with their licence requirement and customer demands.

Most critically, the increase in height is required to ensure proper performance and coverage by the new antennas, and to overcome any blockage that is currently being presented by localised trees. Of potentially even more importance, is the need to accommodate the new ESN services.

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This application demonstrates the technical need for the installation to provide improved customer service.

In terms of design, scale and layout, it is considered that the proposal responds positively to the character, appearance and variety of the local environment and will not have a significant adverse impact on the application site or the surrounding area. The upgrade is of a high standard, maintaining the visual and environmental character of the area.

The telecommunications infrastructure proposed in this application has been designed using appropriate techniques and sited, having regard to technical, engineering and land use planning considerations, in order to minimise its impact on the character and appearance of the surrounding area. The proposal represents an appropriate siting and design solution for this locality, balancing environmental and planning considerations.

PLEASE NOTE OTHER DOCUMENTS SUBMITTED WITH THIS APPLICATION AS FOLLOWS:

Supplementary Information Form

ICNIRP Compliance Certificate

Planning Drawings