

MBNL & EE (UK) LTD

**FULL PLANNING APPLICATION FOR REPLACEMENT MONOPOLE,
REPLACEMENT ANTENNAS, REPLACEMENT SMALL CABINET AND ASSOCIATED
DEVELOPMENT, AT EXISTING SITE, SOUTHERN WATER PUMPING STATION,
OFF AMBERLEY DRIVE, FERRING, WORTHING BN12 4QJ**

APPLICATION REF: FG/139/17/PL

POST APPLICATION STATEMENT

The above planning application was submitted on 25th August 2017, and has been in the course of being processed by Arun Council. The application included various statements in support of the application, including a range of photomontages.

Arun Council have continued to express concerns about the application, but the applicants believe that the Council has not taken full account of the information and justification submitted. The parties have agreed to extend the period within which the application can be considered, so that further information can be supplied.

The applicants thus respectfully put forward the following:

Principle of upgrading and site sharing

The current installation has been in place since 2001. Although subject to some upgrades, the rapid change in technologies and growth in the use of smart devices is such that the site must be upgraded with modern, capable antennas, that can provide the best possible coverage to the local area, while, also providing sufficient capacity. This particularly includes the inclusion of 4G which is NOT currently installed at this site.

In terms of local tree cover (both those immediately located within the compound, and in a much wider, environmental context), while this can be an issue in the summer months, and was initially thought to be of some concern, we understand that this is very much a peripheral matter. The increase in height is required to give the best coverage overview, particularly in terms of 4G coverage.

Allied to this, and of critical importance, is the fact that ESN is required at this site, and this is a service that is not currently installed at this site, nor in the local area. More information on this is detailed below.

Given that the site development is principally for a significant technology upgrade AND for an effective site share, the issue of searching for alternative sites should not be a matter of active concern. In that respect, please note the following:

We would refer you to the Code of Best Practice that was revised in November 2016. In particular, please note the following:

- *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.*
- Section 8, and the reference to Stage 1a on Site Selection (essentially, seeking out the best site for the development concerned) - *Stage 1a relates to the selection of new sites. It would not normally apply to upgrades/alterations to existing sites (including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator).*
- Most particularly the industry adopted Supplementary Information Form (replicated in the CoBP), where at Section 5 Site Selection Process, it states, *Alternative sites considered and not chosen (not required for upgrades/alterations to existing sites including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator).*

Structure height and construction

As above, the increase in height is needed to provide both improvements to coverage and capacity, and to ensure that 4G coverage is available to the widest possible area.

While 3G coverage is adequate from the current site, it is lacking in capacity, and an increase in height would assist this shortfall. More critically, the site does NOT yet provide for 4G coverage, which is essential in providing the widest and most up to date coverage, but equally critically, it is this technology that is used by the ESN system (see below). In order to provide the required 4G coverage for both public users of the system AND for crucial ESN coverage, an increase in height is essential. This latter point is indicated on the attached coverage plots, and (more particularly) is referred to in the accompanying mail from EE.

In terms of structure, it should be borne in mind that the site is supporting not just 2 mobile phone operators (EE and 3 UK), but is also required to accommodate equipment to service the new ESN system. Given this, we are providing the slimmest structure and headframe available to ensure all of this can be accomplished.

Technology and coverage improvement

The existing site does not yet provide for 4G coverage. This technology will:

1. Provide essential up to date data technology to users in the local area and
2. Critically, will allow the introduction of the ESN system

We are advised that for the purposes of ESN, a reasonable height is required to provide ESN coverage, to include cover out to sea (ESN is for all emergency services). In addition, a height of 14m (to the centre line of the antennas) is required in order to provide the widest possible coverage for both the public and for the ESN system.

The enclosed coverage plots indicate the difference in 4G coverage between the different heights (note that this is purely an illustration for the purposes of EE, as it is the EE 4G spectrum that the ESN system will use). Although the differences do not appear significant, we are advised that this is the minimum height required to achieve both an acceptable commercial coverage (for normal mobile phone and other mobile device users), and (crucially) for ESN coverage (the relevant plots are notated as Coverage Report 20709_EE (4G) 08-11-2017).

In this respect, please also find attached a mail from Chris Jeffries of EE, explaining the ESN need, and offering to meet in order to expand on this critical requirement.

Use of site by the new Emergency Services Network

ESN is a new system, which will replace the existing Airwave network. Please refer to the information submitted with the application, which states:

- *ESN is providing critical national infrastructure to enable communications and interoperability for the police, fire and ambulance services in England, Scotland and Wales (including extension into remote areas) to help them cut crime, fight fires and save lives.*
- *ESN will provide the same capability as Airwave as well as an integrated 4G mobile broadband data service using the latest generation of mobile technology.*

Alternative sites

As above, given that this scheme represents both an upgrade and a site share (for ESN), the issue of seeking out alternative sites should not be a consideration.

Arun Council have made reference to an existing site on Greystoke Road Ferring, and have suggested that this might be a more suitable site. A scheme at this location is both impractical, and inadvisable, as follows:

1. It is located some 1.15Km from the subject site, and could not act as an effective replacement for existing coverage. See attached coverage plots (Coverage Report 20709_EE (Ferring WPS Vs Greystoke Rd)).

These illustrate the significant shortfall in both 2G and 3G coverage at an assumed 13m height at Greystoke Road, as against an antenna height of 14m at the subject site. For both 2G and 3G, there is significant shortfall (and areas of non-coverage) in locations such as South Ferring, East Preston and Goring.

2. The site is owned and operated by CTIL (the joint company formed by Vodafone and Telefonica O2)
3. This is an existing slim streetworks pole, designed to mimic a lamppost. In order to accommodate 3 new users on this site (EE, 3 UK and effectively, ESN), this would require complete redevelopment with a very large, tall intrusive structure, which would be entirely out of place, and hugely insensitive, being located on a small highway verge in the midst of a residential area. Even if it were feasible, there is simply insufficient room to accommodate all users with all technologies
4. Even if this were possible, given the distance between the 2 sites, it would still be necessary to upgrade the site at the pumping station in order to ensure updated coverage and capacity for users in proximity to that installation (see point 1 above)

Local Impact

We must again draw the Councils attention to the photomontages that were supplied as part of the application. These have been taken at a focal length which represents a real world view of the site, as it would look after development, and as would be seen by members of the public, as if they were standing at the locations indicated.

The relative remoteness of the site, and the localised tree cover offered, particularly to the south are such that the local impact on amenity is very modest.

The closest views are demonstrated by Photomontages 1 and 2, at some 250m from the site. All other views are more distant, but in all cases, the impact is very minor.

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For Wireless Infrastructure Group
on behalf of MBNL, EE (UK) Ltd & 3 UK Ltd