

Recommendation Report for

**REF NO:** M/49/20/TEL

**LOCATION:** Land at Elmer Road  
Bognor Regis  
PO22 6DZ

**PROPOSAL:** Prior notification under schedule 2, part 16, class A for the installation of a new monopole up to 20m in height supporting 6 no. antennas with a wrap around equipment cabinet at the base of the column, installation of 3 no. new equipment cabinets & ancillary development thereto.

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| <b>SITE AND SURROUNDINGS</b> |
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**DESCRIPTION OF APPLICATION**

The proposal relates to a replacement galvanised steel monopole measuring 20m supporting 6no. antennas with a wrap around equipment cabinet at the base of the column, installation of 3 no. new equipment cabinets and ancillary development.

Cabinet Dimensions would be green in colour and comprise :

1 No. H3G APM5930 Cabinet - 600mm x 600mm x 1200mm (W x D x H)

1 No. H3G Bowler Cabinet - 1900mm x 600mm x 11750mm (W x D x H)

1 No. H3G Mk5 Link Cabinet - 1200m x 500mm x 1700mm (W x D x H)

1 No. H3G Wrap-Around - 1700mm x 700mm x 1600mm (W x D x H)

The proposal is for a new EE and H3G street pole, in order to provide the latest 4G and new 5G technologies to the local area. The upgrade would provide new equipment to cater for 5G coverage and has been designed to be future proof, enabling other technologies to be deployed depending upon the demand required. Central government considers digital communications to be a critical national infrastructure and the proposed shift in equipment has been designed to cause as little disruption to reception as possible. EE will become the Emergency Services Network Provider and in order to dedicate the 4G network for that use, the intention is to support all users during the current climate and to maintain all current services without the initial removal of any existing equipment.

The application falls to be determined under Part 16 of the General Permitted Development Order 2015. The principle of the development is not in dispute. The consideration of the notification concerns only the siting and appearance of this

location. The Local Planning Authority has 56 days to provide its comments to the applicant's agent or it is deemed they have no objection. This period expires on 02-09-2020.

**TOPOGRAPHY**

Predominantly flat

**TREES**

None of any significance affected by the proposed development.

**BOUNDARY TREATMENT**

Railings and brick piers to rear to approx. 1.8m high

**SITE CHARACTERISTICS**

The site comprises a highway verge with trees to the north and south. Other grey colour cabinets are positioned on the verge.

**CHARACTER OF LOCALITY**

Predominantly residential. 3 storey flats to rear behind verge. Some trees within the garden area.

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| <b>RELEVANT SITE HISTORY</b> |
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| M/62/15/TEL  | Prior Notification for the installation of 1No. cabinet adjacent to existing installation & replacement Phase 5 Tower                                             | No Objection<br>13-08-15 |
| M/14/06/TEL  | Prior Notification for Installation of a 15m GRP wood effect telegraph pole with three 3G antennas enclosed within the structure and associated equipment cabinet | Objection<br>15-03-06    |
| M/117/05/TEL | Prior Notification for replacement of existing 12.5m high slimline telecommunications monopole with a 15m monopole of the same design.                            | No Objection<br>21-12-05 |

As demonstrated by the site history this is an established telecoms site.

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| <b>REPRESENTATIONS</b> |
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No Objection

**COMMENTS ON REPRESENTATIONS RECEIVED:**

None

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| <b>CONSULTATIONS</b> |
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**CONSULTATION RESPONSES RECEIVED:**

County Highways - No Objection

It is not considered that this proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network, therefore is not contrary to the

National Planning Policy Framework (paragraph 109), and that there are no transport grounds to resist the proposal.

The imposition of an informative is advised.

## COMMENTS ON CONSULTATION RESPONSES:

Comments noted

### POLICY CONTEXT

Designation applicable to site:

Drainage Area

### DEVELOPMENT PLAN POLICIES

[Arun Local Plan 2011 - 2031:](#)

|        |                                          |
|--------|------------------------------------------|
| DDM1   | D DM1 Aspects of form and design quality |
| TELDM1 | TEL DM1 Telecommunications               |

### PLANNING POLICY GUIDANCE:

|      |                                     |
|------|-------------------------------------|
| NPPF | National Planning Policy Framework  |
| NPPG | National Planning Practice Guidance |

### POLICY COMMENTARY

The Development Plan consists of the Arun Local Plan 2011 - 2031, West Sussex County Council's Waste and Minerals Plans and Made Neighbourhood Development Plans.

The Neighbourhood Development Plan

Where applicable, Neighbourhood Development Plan's (more commonly known as a neighbourhood plan or NDP), once made by Arun District Council, will form part of the statutory local development plan for the relevant designated neighbourhood area.

Middleton does not currently have an adopted Neighbourhood Plan.

### DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

The above policies outline the criteria against which the application will be assessed. The only aspects that can be considered with regard to this prior approval application are the siting and appearance of the development. This application falls to be determined under the requirements of Part 16 of the Town and Country Planning (General Permitted Development) Order 2015, as amended.

### OTHER MATERIAL CONSIDERATIONS

It is considered that there are/are no other material considerations to be weighed in the balance with the Development Plan.

In all applications, the Council must take into account other material considerations. This includes Government Advice, case law and appeal decisions which have emerged over recent years. By Analysis of these considerations, the following are also relevant:

- (i) Health concerns are material planning considerations. Whilst Government advice is that a planning system is not the place for determining health safeguards, Court cases and planning appeals show that public responses on the issue must be weighted in assessing the merits of a site by comparison with alternatives. This must apply to Prior Notification applications as well as applications for planning permission.
- (ii) The Planning Inspectorate consider zero health risk (or near zero risk) to be an unreasonable expectation or basis for a decision.
- (iii) An ICNIRP Certificate, confirmation compliance with guidelines for the emission of electromagnetic energy, is essential. Sites should be secure by fencing with advisory notes attached.
- (iv) Applications must include a thorough examination of alternative sites; this information must be included in the submitted information for public consultation.
- (v) Government best practice advice to applicants expects pre-application consultation with organisations such as schools. The Council can look for evidence that this has happened.

#### CONSIDERATION OF ALTERNATIVE SITES

The Code of Best Practice acknowledges that it has been a long-standing Government policy objective to support the sharing of masts and sites. Sharing of sites is now the norm, and network operators share much of their network infrastructure via joint venture commercial arrangements.

The existing mast is not being upgraded to provide the uplift in coverage proposed and there are no other installations in the immediate local area that could be used for mast sharing. The applications report received with this application explains that alternative sites have not been considered as the proposal is an upgrade of an existing site. The existing street pole on site does not provide 5G to the local area and is unable to be upgraded for structural reasons. Therefore, it is proposed to deploy a new 20m mast to upgrade coverage. In the first instance at least, the development will not be a direct swap out as this would result in a temporary loss of coverage. It is the Applicants intention to, in time, remove the existing 12m pole, resulting in just the single 20m pole. The existing telecommunication street pole is shared by both EE and H3G and provides 2G/3G/4G coverage and capacity to the Bognor Regis area.

The operator is limited in siting options as there is a requirement to provide equivalent 2G/3G/4G coverage to this residential area of Bognor Regis whilst also providing new 5G services. This means that the operator has to be located as close as possible to the existing installation in order to maintain the provision of equivalent coverage and capacity to the surrounding local area. Therefore the search area is very small and the new mast must be in close proximity to the existing mast to fit within the existing network cell configuration.

In line with the requirements of NPPF, there are no existing telecommunications installations for the operator to share, that would provide the necessary coverage to the target coverage area. Similarly, there are no buildings which are suitable and available that the operator could utilise to operate their equipment. The discounted options are set out in the applicant's supporting documents (Section 5) and their reasons for being discounted are fully explained. Therefore, sections (a) and (b) of Policy TEL DM1 have been accorded with.

The proposed new mast has been sited and designed in order to provide 5G coverage and to support the existing mobile network. As the new pole will be complementary to the existing 2G/3G/4G mast it must be placed within the same site as the existing pole in order to replicate the coverage.

Paragraph 113 of the NPPF states '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. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate'.

## CONCLUSIONS

The proposal falls to be determined under Part 16 of the General Permitted Development Order 2015. The principle of the development is not in dispute. The consideration of the notification concerns only the siting and appearance of this location.

The main policy considerations in respect of this proposal are Policy TEL DM1 of Arun Local Plan, the NPPF and the Code of Best Practice on Mobile Network Development in England provides useful guidance.

The relevant parts of Policy TEL DM1 to be considered in relation to this application are:

- a) There are no satisfactory alternative sites for telecommunications available;
- b) Alternatives have been investigated, including the possibility of mast sharing and mounting the antennae required on existing buildings or other structures
- d) The proposal will not have an unacceptable impact upon the landscape,
- e) The proposal will not have an adverse effect on the amenity of local residents;
- f) Proposals include full details of all new landscaping, screening and of any trees or vegetation to be retained on the site. In addition, details of a satisfactory scheme to return the site to its former or improved condition once operations have ceased are also required;
- g) Proposals include full details of the design and external appearance of the development including siting, colour and materials;

The application includes sufficient information in respect of parts (f) and (g) to allow determination and alternatives (a) and (b) are discussed above. Compliance with part (d) is discussed in more detail below.

MBNL, EE and H3G are seeking to upgrade and enhance their network services in the area by installing infrastructure that will allow them to fulfil their licence obligations and deliver new 5G technologies to this area. The Code of Best Practice was revised in November 2016 and is supportive of mobile network provision in line with Government aspirations that everyone should have access no matter where they are located.

The proposed new mast has been sited and designed to be complementary to the existing 2G/3G/4G mast and therefore there is a requirement for it to be located immediately adjacent to the existing pole in order to replicate the coverage.

At present the current massive shift in user demand from city centres and places of work to residential areas requires an improvement in coverage and capacity throughout the network. This proposal provides additional capacity to the network whilst also promoting the improved 5G technology.

The proposed development location enables the surrounding area to benefit from improved 5G network coverage and has been designed to be future proof, thus enabling other technologies to be deployed depending upon the demand required. As the shift in demand is expected for the foreseeable future and as central Government considers digital communications to be a critical national infrastructure, the applicant intends to support customers and local residents by ensuring as little disruption as possible.

Due to the beamforming technology required for 5G service, the antenna height must be greater than that for previous generation technology. Following the development, there will only be one street pole present since an existing pole will be removed. The proposed design was chosen to minimise the visual impact on the surrounding area.

Site selection was progressed in accordance with the applicants licence obligations, advice in the NPPF and the Code of Best Practice and represents the least environmentally intrusive, technically suitable, available option

#### Siting

The proposed siting of the mast is on a road in a residential area, but set away from nearby houses. The proposed 20m mast is to sit alongside an existing 17m mast, which will eventually be removed leaving just the new 20m mast standing on site. The closest receptor will be the dwellings situated within Buckingham Court to the south. The distance is enough to ensure that a new 20m mast will not have any more harm than the existing 17m mast. Views from the residential properties will not be adversely affected, the mast would be set away from the residential properties as far as is practical whilst ensuring that network coverage is maintained. The proposals would therefore be acceptable in terms of amenity. The proposal includes the necessary ICNIRP Certificate.

The installation of a 20m slim-line column designed to be as similar as possible to the other linear structures found in the immediate area will be no more at odds with the streetscene and character of the area than the other vertical structures within the immediate locale.

As discussed above, It is important for the applicant to place the new mast adjacent to the existing in order to complement the existing 2G/3G/4G coverage with 5G. The mast will not appear unduly prominent in the streetscene and will accord with Policy TEL DM1.

The replacement pole would be taller than the pole it replaces and wider, but its visual presence would not increase significantly as a result of its repositioning and dimensions. The pole would be located on a grass verge along Elmer Road where other street cabinets, poles, road signs and trees exist. The proposed replacement equipment would not look out of place or be visually prominent in the street scene it would be assimilated into the trees and other vertical structures which exist along the verge.

#### Appearance

The design of the monopole has been carefully considered by the Operator. It is a simple, functional slim-line monopole, with the main column being split in to two sections. The upper section is wider than the lower section in order to safely accommodate the antennas at the top of the column. The mast will be coloured Grey which has been well established as the best colour for minimising impact upon urban streetscapes. The cabinets will be coloured Green in line with the existing equipment cabinets already in situ and other statutory undertakers' equipment cabinets which are often found in urban areas. The proposed street furniture style development is the most suitable type of base station as this is the most accepted design for urban and suburban roadside locations.

Due to all the technologies that will be available at this location, 2G, 3G, 4G and 5G, the applicant has advised 6 antennas need to be installed at the top of the slim-line monopole. These are split into a dual stack formation where 3 antennas will be located at the top of the column and the other 3 will be located underneath the upper set of antennas.

5G new radio technologies operate in higher frequency bands than older technologies where attenuation of the radio signal is higher and the effects of clutter from trees and other structures are greater it will normally require a higher structure to achieve the same coverage footprint. These factors drive a requirement for an increase in antenna height in 5G.

The new antennas are all unshrouded for technical reasons. However, they have been designed to be as tight as possible and virtually the same width as the main column, to minimise their visual appearance. The higher the radio frequency the more signal attenuation there is. The higher frequency 5G antennas are unable to operate effectively through the Glass Reinforced Plastic that the shroud is made up of and as such if these antennas were to be shielded then they would not be able to provide the necessary coverage to the target coverage area. An additional installation would be needed elsewhere within the cell area, leading to the proliferation of masts.

It is accepted that the height of the proposed installation is taller than other pieces of surrounding linear structures but this in itself is not a valid reason to conclude that it is not appropriate at a specific location. Indeed, Inspectors at appeal have noted that by their very nature to be effective masts are required to be taller than surrounding structures. If the column were to be any lower, the antennas would not be able to provide the necessary 5G coverage to the target coverage area and would not be able to clear the urban clutter/tree canopy. As a result, the antenna signal would not be able to operate effectively. A lower height would lead to a poor user experience for a large part of the target coverage area and would require an additional installation contrary to national planning guidance contained in the NPPF.

This is the slimmest design possible which will enable all technologies to be supported from this site. If the column and shroud width were to be any slimmer then the technology would not fit in the one column and another radio base station would be required, which would lead to an unnecessary proliferation of masts contrary to national Government guidance set out in the NPPF and The Code of Best Practice. Similarly if the column were to be a uniform width throughout then the overall width would have to increase which would appear more visually prominent in the streetscene, than the proposed design.

The proposed design is more visually sensitive and much easier to assimilate into a streetscene than lattice towers or unshrouded pole designs with bulky headframes which would appear alien in this location. Therefore the operator has compromised on obtaining maximum coverage in order to better assimilate in to the streetscene.

The design of the column is a simple, functional, vertical structure which will not appear incongruous within the streetscene, which is characterised by similar linear structures. The column will be coloured grey which is considered to be appropriate in this location.

The cabinets are coloured green and designed to appear like other statutory undertakers equipment cabinets, including in the immediate streetscene and cabinets can be installed under the operators permitted development rights.

The main issues arising from this prior approval notification are whether the proposed mast and cabinets due to their scale and siting would be a visually obtrusive feature which would be detrimental to the character and appearance of the area. Whether any perceived harm would outweigh the significant social and economic benefits associated with the increased service provision attributed to the proposal and other valid material considerations as outlined within NPPF and the Arun Local Plan.

The social and economic benefits of providing reliable and high quality mobile broadband connections including 5G support growth in productivity, efficiency and labour force participation across the whole economy is fully supported by the NPPF and the aims and objectives of the Local Plan. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area.

The proposal would therefore be acceptable in terms of visual amenity and it is recommended that no objections are raised to the siting and design of the equipment.

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| <b>RECOMMENDATION</b> |
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NO OBJECTION

- 1       INFORMATIVE:  
The Local Highways Authority advises the applicant that they must obtain formal approval from the highway authority to carry out the proposed works on the highway, please call 01243 642105.