

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Lucking Lane Streetworks	Site Address:	Elmer Road, Bognor Regis PO22 6EH
NGR:	497734, 100358		
Site Ref Number:	Vodafone Ref: 46574	Site Type:	Joint Macro Upgrade with Site Share

2. Pre Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	N/A	
If no explain why: Utilising an existing mast.		
Was the industry site database checked for suitable sites by the operator:	N/A	
If no explain why: Utilising an existing mast.		

Annual roll out consultation with LPA

Date of last annual rollout information/submission:	October 2009
Name of Contact:	Director of Planning
Summary of outcome/Main issues raised:	Annual rollout information submitted, although this may not reflect most recent site release.

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	N/A
Was there pre-application contact:	Yes
Date of pre-application contact:	16 th July 2010
Name of contact:	Anita Gardner
Summary of outcome/Main issues raised: Various aspects of proposal clarified.	
Ms Gardner confirmed that mast sharing complied with Local Planning Policy.	

¹ Macro or Micro
CAPE Planning Manual
Owner: Brian Truman
Cornerstone SSSI v1
2010 Cornerstone

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	GREEN		
Outline Consultation carried out:			
Summary of outcome/Main issues raised:			
Pre-application letters to Parish Council and Ward Councillors. No response.			

School/College

Location of site in relation to school/college:
No schools in the immediate proximity.
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?	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	No
Details of response:	
N/A	

Developer's Notice

Copy of Developer's Notice enclosed?	Yes
Date served:	10 th August 2010

3. Proposed Development

The proposed site: This particular site has resulted from Project Cornerstone, a genuine joint venture between Vodafone and O2 which seeks to establish a process whereby the needs and requirements of both operators, in terms of genuine improved coverage and capacity, can be accommodated within a single joint scheme. The principle of a single combined installation clearly fits very well with both National and Local Policy. The scheme seeks to replace an existing Vodafone telecommunications pole with one of slightly differing dimensions, but which remains an essentially slimline streetworks pole, together with replacement shrouded antennas designed to be minimal in appearance. Please note that the small increase in height is to ensure adequate coverage can be obtained, and to ensure continued compliance with ICNIRP guidelines. In addition, a further small equipment cabinet will be placed close to the installation.

Enclose map showing the cell centre and adjoining cells:
Enclosed with Technical Justification

Type of Structure	
Description:	
Installation of replacement streetworks pole and associated ancillary development.	
Overall Height: 14.8m	
Height of existing building N/A	Metres
Equipment Housing: 1No. (additional)	
Length:	1.89 Metres
Width:	0.79 Metres
Height:	1.65 Metres
Materials	
Tower/mast etc – type of material and external colour:	Streetworks pole and GRP shroud – Galvanised as per existing.
Equipment housing – type of material and external colour:	Steel, Green as per existing.

Reasons for choice of design:

The scheme seeks to replace an existing and established telecommunications installation with one that will be very similar in terms of siting and appearance. The replacement pole and antennas will largely be the same as the existing structure, while the additional cabinet will fit with the context of the existing installation. Please note that the small additional height increase (approx 300mm) is to ensure both coverage and continued ICNIRP compliance.

We believe this scheme will have minimal visual impact at this location:

4. Technical Information

ICNIRP Declaration attached	Yes	
ICNIRP 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 the site are taken into account.		

Frequency:	3G – 2100MHz
Modulation characteristics ²	UMTS: QPSK
Power output (expressed in EIRP in dBW per carrier)	40 dBm
In order to minimise interference within its own network and with other radio networks, Vodafone operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision	
As part of Vodafone's network, the radio base station that is the subject of this application will be configured to operate in this way.	
Height of antenna (m above ground level)	12.6m (underside)

² The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase modulation

The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation

5. Technical Justification

Enclose predictive coverage plots.

Reason(s) why site required e.g. coverage, upgrade, capacity (map attached if required):

This site is required particularly to provide third generation coverage and capacity (particularly for O2) to the heart of Middleton-on-Sea.

PPG8 advises that operators are required to provide a high quality service, which includes the need to meet customer demand. It states that systems are demand-led, therefore operators are continually expanding their networks to accommodate customer requirements of service and quality.

PPG8 advises that local planning authorities should have regard to any technical constraints on the location and proposed development. Material considerations include the significance of the proposed development as part of a national network.

Further information on 3G networks can also be found in the adopted Code of Best Practice (Annex B, particularly Section

6. Site Selection Process – alternative sites considered and not chosen (Enclose map highlighting all alternatives that have been considered by the operator)

Site ³	Site Name and address	NGR	Reason for not choosing ⁴

³ ETS – Existing Telecomm site, ES – Existing Structure, RT – Roof Top, GF – Greenfield

⁴ SP – Site Provider, RD – Redevelopment Not Possible, T – Technical Difficulties, P – Planning, O - Other

If no alternative site options have been investigated, please explain why:

The only alternative would be to co-locate another separate streetworks pole at the same location, however as this does not comply with neither National nor Local Planning Policy this was immediately discounted.

Additional relevant information:

Siting:

We have considered the detail siting and design very carefully to ensure that the scheme has a minimal impact on visual amenity. In particular, we have devised a scheme that is a replica of the existing installation, with only modest changes to the pole and antennas, together with the addition of a small equipment cabinet.

Thus the impact on the locality will be modest.

Visual appearance:

We have described above the nature of the design and the location of the various parts of the installation to ensure the visual impact is minimal.

We would repeat again that we have carefully placed and designed the scheme to ensure the principles of good siting and appearance are adhered to. The overall impact of the installation on the environment are limited.

The small increase in height of the pole (just 300mm) is to ensure both continued appropriate coverage and ICNIRP compliance.

Consultation

In accordance with the industry '10 commitments' and the code of Best Practice, consultation has been carried out prior to submission of this proposal. This included correspondence with the Planning Department of the Council.

In addition, we have sent out consultation letters to the relevant Ward Councillors and Parish Council. No response was received from either.

Planning Policy**National Policy**

This proposal and the work undertaken prior to submission has had full and proper regard to both central Government guidance and Local Plan Policy.

Planning Policy Guidance Note 8 details Government guidance on planning for telecommunications development. This confirms the principle policy of the Government to facilitate the growth of new existing telecommunications systems, whilst keeping the environmental impact to a minimum. In accordance with PPG8, we have detailed the Technical Limitations (para 7), undertaken consultation prior to submission (paras 8-13), have had due regard to environmental consideration as detailed above (paras 14-18), considered the prospects of mast sharing, which is exactly the nature of this particular scheme (paras 19-22), have taken care with the design in the local context (paras 24-28), and have demonstrated compliance in respect of Health & Safety (paras 29-31).

We particularly feel it worth emphasising the compliance of this proposal with many sections of PPG8, in particular:

Paragraphs 19 & 20 and Appendix Supporting Guidance, paragraph 66 – “In order to limit visual intrusion the Government attaches considerable importance to keeping the numbers of radio and telecommunication masts, and of the sites for such installations, to the minimum consistent with the effect operation of the network. The sharing of masts and sites is strongly encouraged where that represents the optimum environmental solution in a particular case”

Paragraph 24 and Appendix Supporting Guidance, paragraph 76 – “In seeking to arrive at the best solution for an individual site, authorities and operators should use sympathetic design and camouflage to minimise the impact of development on the environment”.

Paragraph 25 and Appendix Supporting Guidance, paragraph 77 – “The telecommunications industry is encouraged to continue to develop innovative design solutions, in terms of not only of the structure of mast and antennas but also the materials and colouring”.

Planning Policy Statement 1 emphasises the need to ensure sustainable development.

Paragraph 5 states “Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by

- *Ensuring that development supports existing communities and contributes to the creation of safe, sustainable and liveable and mixed communities with good access to jobs and key services for all members of the community.”*

Planning Policy Guidance Note 13 states at paragraph 5:

“Land use planning has a key role in delivering the Governments integrated transport strategy. By shaping the pattern of development and influencing the location, scale, density, design and mix of land uses, planning can help to reduce the need to travel, reduce the length of journeys and make it safer and easier for people to access jobs, shopping, leisure facilities and services by public transport, walking and cycling. Consistent application of these planning policies will help to reduce some of the need for car journeys (by reducing the physical separation of key land uses) and enable people to make sustainable transport choices”

Vodafone and O2's proposals in case contribute to a sustainable pattern of development given that it provides access to significantly improved communication and information systems. This will have an impact on reducing the need for travel, particularly by encouraging home working.

Local and Regional Plan Policy

In terms of Local Plan Policies, by virtue of Section 54(a) of the Town and Country Planning Act 1990 [further enshrined in section 38(6) and the Planning and Compulsory Purchase Act 2004], development should be in accordance with development plan policies, unless material considerations indicate otherwise.

The current adopted plan is The Arun District Local Plan 2003 which was adopted on the 17th April 2003 and covers the period up to 2011. Saved Policy DEV41 relates to Telecommunications, and it is believed this scheme fully accords with that policy as follows:

“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.**"

Policy DEV41 clearly encourages the sharing of sites wherever possible and places an emphasis on good design to minimise the impact on the surrounding area. We are confident that the proposed redevelopment of an existing site to enable sharing meets all of these criteria.

Health & 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 98 of PPG8:

"However, it is the Government's firm view that the planning system is not the place for determining health safeguards. It remains central Government's responsibility to decide what measures are necessary to protect public health. In the Government's view, if a proposed mobile phone base station 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 and concerns about them."

This policy has been successfully tested at numerous appeals (many at public enquiry) and in the High Court. The most recent case tested the principle in both the High Court and Court of Appeal, in relation to a scheme in Harrogate.

In January 2004 the Swerdlow report, entitled "Health Effects from Radio Frequency Electromagnetic Fields" was published by the NRPB. This major Government study will carry significant weight in the determination of future planning applications and appeals. An inspector's decision in 2004, following a major Inquiry in connection with three TETRA installations on the Gower Peninsula summarised the Swerdlow report's conclusions as follows:-

"the Swerdlow report reaffirms that the research published since the Stewart Report, including that concerning TETRA, does not give cause for concern and that the weight of evidence does not suggest that there are adverse health effects from exposure to RF fields below guideline levels....."

The Stewart Report explained the precautionary approach as following a policy that minimises the chance of adverse outcomes without unnecessarily stifling progress. The Swerdlow Report confirms that the risks from RF radiation are acceptably low and small in comparison with many other risks we face daily, whilst recognising that research should continue. That is to my

mind a correct, prudent and balanced approach."

In May 2006 the World Health Organisation (WHO) published factsheet number 304 entitled "Electromagnetic Fields and Public Health". Within the factsheet it states that "considering the very low exposure levels and research results collated to date, there is no convincing scientific evidence that the weak RF signals from base stations and wireless networks cause adverse health effects".

As above, and included within this application. Vodafone and O2 have confirmed this installation will be full ICNIRP compliant.

Conclusion

O2 have a clear requirement for an installation within this particular area, to provide upgraded, improved and extended 3G coverage.

Vodafone and O2 consider that the proposed development strikes an appropriate balance between the technical needs of the site and the advantages that this type of technology brings, with the requirement to ensure that any impact on the appearance and character of the area is the minimum possible, in accordance with both national and local planning policy and guidance.

In this particular case, considerable effort has been made to devise, design and locate the installation to ensure minimal impact in relation to siting and appearance and this have been achieved by sharing the 3 existing antennas as opposed to adding 3 O2 antennas.

Contact Details

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Signed:		Date:	10 th August 2010
Position:		Company:	Pico Consultants Ltd
		(on behalf of above operator)	