

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name: Sparkes Boatyard	Site Address:	Existing installation Land at Sparkes Boatyard Earnley Road Hayling Island PO11 9SL
NGR: 474655, 098895		
Site Ref Number: 25500	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 – Site upgrade		
Was the industry site database checked for suitable sites by the operator:	Yes	No
If no explain why: N/A – Site upgrade		

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	N/A	
Was there pre-application contact:	Yes	No
Date of pre-application contact:	N/A	
Name of contact:	N/A	
Summary of outcome/Main issues raised:		
The proposal is not considered to represent a significant increase to the existing scheme. Due to the minor nature of the proposed development consultation was not undertaken in this instance.		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green	Amber	Red
Outline Consultation carried out: In accordance with the guidance contained within the Code of Best Practice on Mobile Network Development in England (2016), the site was assessed against the Traffic Light model and assigned a rating of green. Therefore, in line with the requirements of the Code, and due to the minor nature of the proposal, community consultation has not been undertaken in this instance.			

¹ Macro or Micro

Summary of outcome/Main issues raised:

N/A

School/College

Location of site in relation to school/college:

A search of publicly available Department for Education records identified no schools located close to the site.

Outline of consultation carried out with school/college:

Given the distance involved schools consultation was not considered necessary in this instance.

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
	Yes	No
Details of response:		
N/A.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	29 November 2016	

3. Proposed Development

The proposed site:

The application site is the existing EE and H3G installation located on land in the south-western corner of the Sparkes Boatyard site. The existing installation comprises a 14m high flagpole style of mast. Equipment cabinets are located at the base of the pole. The site currently provides 3G coverage for EE and H3G locally and forms part of the operators' linked networks of sites.

The site is located on the edge of the boatyard site, with some trees and bushes which provide a degree of screening to the existing development. The closest residential properties are on Earnley Road to the south and east of the site, the nearest being approximately 100 metres from the site. The site is located within the Chichester Harbour Area of Outstanding Natural Beauty.

It is proposed to replace the flagpole with a slightly taller monopole, 15 metres in height. The replacement monopole would be one metre taller and slightly more substantial than the existing pole. Two additional equipment cabinets are also proposed adjacent to the existing cabinet. The upgraded site would provide a significant increase in services. EE would achieve 2G, 3G and 4G coverage, while H3G would achieve 3G and 4G coverage from the shared structure.

Description: The upgrade of the existing telecommunications installation through the replacement of the existing 14 metre high monopole with a new 15 metre high monopole supporting 3 no. antennas, the installation of 2 no. additional radio equipment cabinets and development works ancillary thereto.	
Overall Height:	15 metres
Height of existing building:	N/A
Additional Equipment Housings:	
Length:	0.72m/ 0.75m
Width:	0.72m /0.55m
Height:	1.65m/ 1.78m
Materials:	
Tower/mast etc – type of material and external colour:	Steel with a galvanised finish. The pole could be coloured if considered appropriate by the LPA.
Equipment housings – type of material and external colour:	Steel coloured grey to match the existing cabinet on the site.

Reasons for choice of design:
The applicant gives due regard in designing all new sites and site upgrades to the desire to limit visual impact through good design, particularly in environmentally sensitive areas such as this one. The Applicant has limited the size and amount of apparatus proposed to that required for operational effectiveness. The upgrade is needed to provide enhanced coverage to the surrounding area, in particular to provide new 2G and 4G coverage to the area for EE and additional 4G coverage for H3G (trading as 3). The existing antennas need to be replaced to be able to provide the enhanced coverage. It is not possible to provide the enhanced coverage from the existing antennas, and the existing flagpole cannot support the new antennas, hence the need for a new structure. It is considered the alternative of proposing an additional installation to provide enhanced coverage to the area would have a greater overall impact. New cabinets are also needed to house additional radio equipment for the enhanced coverage. These are proposed to be located adjacent to the existing cabinet. The proposed design allows the existing general appearance and footprint of the site to be maintained with only a minimal increase in height and slightly more substantial structure. This is the best design solution available to the applicant, allowing as it does a balance to be achieved between the technical and environmental considerations and preventing harm to the location. The pole would increase in scale, however this is considered to be minimal and its impact would be outweighed by the significant benefits of the proposal.

4. Technical Information

ICNIRP Declaration attached	Yes	No
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.		
In order to minimise interference within its own network and with other radio networks, both EE and H3G operate their networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of EE's and H3G's networks, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure 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:
The upgrade of the site will provide enhanced coverage to the area. The existing installation provides 3G coverage for EE and H3G in the local area. The proposed equipment upgrade would introduce 2G and 4G technology for EE, and new 4G coverage for H3G. The mobile operators are obligated by Ofcom to provide voice coverage across 90% of the UK's landmass by the end of 2017. In addition to this obligation, EE aims to achieve 98% population LTE coverage within a similar timeframe. Existing 4G coverage levels in the surrounding area fall well below these levels and those expected by network users in the area. The proposed upgrade would remedy existing deficiencies and form an important part of the 4G rollout. In addition to the voice and texts services available with 2G and 3G coverage, 4G (also known as LTE) will allow users of the network to benefit from ultra-fast speeds when browsing the internet, streaming videos, or sending emails wherever they are. It also means faster downloads on the go. One of numerous benefits of this, on a wider scale, is that this allows for an increase in home working, by providing the opportunity to create a "virtual office", reducing in the need to travel for work as a consequence, which is helpful in supporting the sustainable development agenda.

It has been possible to introduce these services within this area through a minor equipment upgrade at an existing site rather than through the introduction of additional base stations in the locality.

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

Site Name and address	Indicative NGR	Reason for not choosing
		N/A

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

Paragraph 43 of the National Planning Policy Framework, in which the Government's supportive stance towards developing high quality communications infrastructure is laid out, states that "(local authorities) *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*". There is no such justification in this case.

EE has examined its existing portfolio of sites in this region and determined that there are no alternatives in the area which can be upgraded to provide the required coverage within the target area. The existing installation at Sparkes Boatyard represents the only feasible option in this instance which allows the current technical requirement to be met without the deployment of an additional base station in the locality.

Additional relevant information:

Siting and Appearance

The following should be read in conjunction with section 3 and with the policy assessment later in this section.

In terms of siting, the selected option is a well-established telecommunications site which has previously been assessed by the local authority and deemed suitable for telecoms use. The siting is, therefore, considering wholly acceptable, particularly given that the alternative would be to deploy an additional base station within the area in order to achieve enhanced coverage for EE and H3G.

In terms of appearance, there would be only a minimal increase in visual impact. The increased scale of the development would not cause harm to the surrounding area. The replacement pole would be slightly taller and more substantial than the existing, however this increase in scale would be minimal. The additional equipment cabinets would be sited next to the existing cabinet. It is considered the minimal additional impact would be outweighed by the significant benefits of the proposal.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2012) (NPPF)

The NPPF, which came into force on 27 March 2012, has replaced PPG8 in terms of national policy specifically relating to electronic communications development.

Paragraph 14 of the NPPF states *'At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. ...*

'For decision taking this means:

- *approving development proposals that accord with the development plan without delay; and*
- *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- *specific policies in this Framework indicate development should be restricted.*

Included within the core planning principles to be taken into account in paragraph 17 are the following relevant points:

- *planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;*
- *always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
- *support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);*
- *conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;*

Paragraph 21 advises LPA's to *'plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;'* and paragraph 29 recognises that *'Smarter use of technologies can reduce the need to travel.'* The upgrade proposed in this application will facilitate 4G technology, allowing for home working and can reduce the need to travel, thus contributing to the sustainability agenda.

Leading on from this, Section 5 of the NPPF addresses supporting high quality communications infrastructure. Paragraph 42 sets out that *'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.'*

It has already been noted that Paragraph 43 advises that *'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.'*

The proposed upgrade of an existing radio base station directly accords with NPPF guidance.

Paragraph 44 emphasises that LPAs *'should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development.'* It sets out that LPA's *'should ensure that:*

- *they have evidence to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*

The European Commission has issued a directive (2004/108/EC) governing all forms of electronic equipment regarding the interference that such equipment produces and, in turn, its immunity to interference from outside.

Any equipment compliant with that directive, such as that proposed in this application, is unlikely to suffer or cause interference. However, if there is a complaint of interference to domestic radio and television, in the first instance the BBC will assist, via the BBC Help Receiving TV and Radio web site at: <http://www.bbc.co.uk/reception/>. If, following investigation, there is evidence of interference, the operator will ensure any issues associated with their equipment are addressed. For any other types of interference, Ofcom will investigate.

Finally, Paragraph 46 clarifies that LPA's *'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.'*

ICNIRP compliance documentation is included within the accompanying application papers, thus the only remaining considerations must be planning related, specifically in this case siting and design, both of which are considered wholly appropriate given the use of an existing facility mitigation of visual impact as discussed in the preceding subsection.

It has already been established that the proposal will not cause material harm to the local environment. The limited visual impact of the proposal is considered to be outweighed by provision of a reliable high quality modern communications network for mobile network users.

The proposal outlined within the document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework. The development would assist in keeping the overall number of installations to a minimum and minimise impact on the surrounding area.

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.

For the purposes of Section 70, the current adopted development plan for the area, relevant to the proposal, consists of the Council's Core Strategy (adopted 2011) and its Allocations Plan (2014). There are no policies which are directly relevant to telecommunications development. Relevant policies include CS12 (Chichester Harbour Area of Outstanding Natural Beauty) and CS16 High Quality Design) of the Core Strategy. Policy CS12 aims to conserve and enhance the special qualities of the AONB whilst allowing development which is appropriate to the economic, social and environmental wellbeing of the area. Policy CS16 confirms permission will be granted for development that is designed to a high standard.

It is considered the proposed upgrade conforms to the broad aims of both policies. In terms of design a slim and unfussy design of pole is proposed which would have a minimal additional impact on the surrounding area. The sensitive design would also ensure the qualities of the AONB are preserved, and it would provide economic and social benefits to the area.

Summary

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. Local policy aims to protect the special qualities of the AONB.

The specific requirement of the operators in this instance can be achieved through the upgrade of an established site, with a minimal additional impact and without harm to the local environment. The proposed upgrade is compliant with the NPPF and the slim and unfussy design ensures only a minimal increase in impact which would be outweighed by the benefits of the proposal.

The proposal is fully compliant with ICNIRP guidelines and a declaration of compliance is included.

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