

Date: 13 July 2021

Our Ref: 55905/HVT043/Chariot/MP

Chief Planning Officer
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
PO9 2AX

Submitted via Planning Portal

Dear Sir or Madam,

PLANNING APPLICATION FOR TELECOMMUNICATIONS UPGRADE AT WESSEX SELF DRIVE PERM, THE DEPOT, FULFLOOD ROAD, HAVANT, HAMPSHIRE, PO9 5AX

(NGR: E 471382 / N 108242) (SITE REF: 55905/HVT043)

Avison Young are planning consultants acting on behalf of Mobile Broadband Network Limited (MBNL), which is a joint venture co-owned by EE Limited and H3G UK Limited, to submit the application contained herein for the upgrade of an existing telecommunications base station as proposed below.

Description of Development:

Removal of 1no existing 17.5m monopole and 1no equipment cabinet to be replaced with 1no new 18m monopole accommodating new antennas with wrap-around cabinet, installation of 1no new cabinet, 1no equipment rack, 1no GPS node and associated ancillary works thereto.

Enclosed you will find an application prepared on behalf of EE Limited and H3G UK Limited who is a licensed operator that provides Cellular Network based upon the Global System for Mobile (GSM) standard and Universal Mobile Telecommunications System (UMTS) within the United Kingdom.

The supporting documents submitted with this application are as follows:

- Application Form (as generated through Planning Portal)
- Drawings 55905_WESSEX SELF DRIVE PERM_002, 100, 150, 210, 260_A
- Planning Statement (Design and Access Statement)
- ICNIRP Certificate
- 5G and Future Technology
- Connected Growth Manual – Digital Infrastructure
- IET Guide to 5G

The application fee of £462 will be paid via the Planning Portal.

We trust you will find the enclosed information sufficient to register and validate the application. Should you require any further information, please contact me on the below details.

Yours sincerely,



Mandy Poon
Assistant Planner
Telecoms
Mandy.Poon@avisonyoung.com

Avison Young
For and on behalf of Mobile Broadband Network Limited

DESIGN AND ACCESS STATEMENT

The following design and access statement is enclosed in support of this proposal and demonstrates the general development principles that have been adopted in the final detailed design of this proposal.

1. HISTORY & BACKGROUND

Everything Everywhere Limited is a 50-50 joint venture between Deutsche Telekom and France Télécom and was formed in 2010 through the merger of their respective T-Mobile (UK) and Orange U.K. businesses. On 3 September 2010, Everything Everywhere announced that Orange would join Mobile Broadband Network Ltd (MBNL), the joint venture management company formed in December 2007 between T-Mobile UK Ltd and Hutchison 3G UK Ltd (H3G UK). In 2016, Everything Everywhere was chosen to work in conjunction with the Home Office to deliver the Emergency Services Network (ESN), which will deliver a smarter, better and cheaper communications capability.

The proposed upgrade subject to this application is part of the operators' continuous efforts to improve the existing 3G and 4G network across the country, in addition to introducing 5G technology to cater for current and future customer demands. It is evident that mobile phone usage has grown exponentially over recent years as more than 90% of the population now own a mobile phone. Customers expect to be able to use their mobile phones and tablets in all locations as these devices have become intrinsic to our personal and professional lives. UK operators are continuously trying to improve their network infrastructure in order to adapt to the changing environment and keep up with customer demands. With constant advancements in radio technology, it is therefore a natural consequence for base stations to be upgraded to accommodate newer versions of radio equipment.

As part of EE and H3G's ongoing network programme, there is a requirement for infrastructure improvements in this area of Havant and the surrounding local community. The proposed upgrade works will allow for better coverage and increased capacity to satisfy the traffic demands set by mobile users passing through this region, and will also help towards futureproofing the network to reduce the frequency of works required at the site.

Site Selection

The applicant has adopted a sequential approach to site selection which is encouraged in the Code of Best Practice for Mobile Operators and the NPPF. Efforts have been made to utilise existing telecommunications sites wherever possible to prevent the proliferation of base stations. In this instance there was a suitable existing base station in the search area that could be upgraded to accommodate the required technologies for the operator's needs. As a result, it was not required to identify alternative site options.

2. DESIGN

2.1 THE PROPOSAL

The application site is located within an industrial business park on the southern side of Fulflood Road. Adjacent to the development area is a mature tree belt which separates the industrialised area from the residential houses located to the south. The surrounding area is of mixed use where the business park presents a commercial and industrialised setting, and the presence of houses within the wider area creates a largely residential characteristic. The development area accommodates an existing base station which is an established feature of this streetscape that serves as an important cell within the wider mobile network due to the high density of users in this urban environment. The site is not found within designated Article 2(3) land.

The description of development seeks to upgrade the existing site which comprises the removal of 1no existing 17.5m monopole and 1no equipment cabinet to be replaced with 1no new 18m monopole accommodating new antennas with wrap-around cabinet, installation of 1no new cabinet, 1no equipment rack, 1no GPS node and associated ancillary works thereto. The proposed equipment will remain in its manufactured grey form. As the proposal seeks to replace a mast with an increase of more than a third in width, an application for Full Planning permission is therefore submitted herein.



2.2 DESIGN CONSIDERATIONS

The applicant has sought to cause as little impact on the visual amenity of the area as possible whilst also ensuring that sufficient coverage requirements are achieved. A further explanation of the application's technical justification is explained in a later section of this statement however, it should be acknowledged from the offset that the proposed upgraded antennas are necessary in order to create the technical power and capacity that the 5G frequency demands. The resulting benefits will improve existing mobile coverage through stronger and faster connectivity which will reach a wider target area. Moreover, the proposed height of the antennas is the lowest technically possible to ensure correct signal conveyance whereby a reduction in height may impact on the site's functionality as well as health and safety in relation to ICNIRP compliance. It should be emphasised that intervening elements such as buildings and trees can weaken signal strength meaning that a height increase is often necessary to counter these limitations. The operator's general practice will always endeavour to propose the minimum height and least amount of equipment necessary to sufficiently achieve the desired coverage levels and it should be recognised that any reduction in height or equipment would compromise the site's effectiveness within the network. There are no alternative design solutions available with the required technologies meaning the proposed scheme is the least visually intrusive design for the site's upgrade.

Whilst it is not necessary to outline alternative locations as the proposal seeks to utilise an existing base station, it should be noted that if an upgrade cannot be progressed at this location, a new base station within proximity to this site would be required to satisfy coverage objectives. The existing base station was deemed acceptable in its inception meaning that no concerns were raised in relation to its location within the immediate area and any associated sensitive assets. Though it is recognised that changes to a telecommunications site will to a degree be recognisable in any given environment, the visibility of equipment does not automatically lead to detrimental harm as each site must be assessed on its own merits and balanced against the public benefits to be provided in accordance with Paragraph 196 (NPPF). In this respect significant weight should be given to improving existing 4G coverage and introducing 5G technologies in recognition of the government's support for this form of development. The application site is an established feature of this urban street scene where telecommunications equipment is commonly found which sets precedence at this location.

Siting and Appearance

To maintain the overall appearance of the existing site, the applicant has adopted a minimalistic approach to utilise existing apparatus as much as possible and in this instance the existing monopole is incapable of providing sufficient support and height separation for the replacement technologies. A new monopole is therefore required due to these technical constraints in which a minor height increase of 0.5 metres is needed to achieve ICNIRP compliance and optimal signal conveyance towards the large target area overall. The replacement monopole is designed to be slim in nature to ensure that a bulky appearance is not presented, which could lead to increased visual prominence, and its relatively thin profile can be likened to the existing mast as well as other street items including lighting columns and telegraph poles. Such street items are visible around the development area which provides vertical emphasis against the skyline and aids the site's assimilation into the wider street scene. Moreover, the colour finish of the proposed equipment will match existing equipment in situ which is considered to be an appropriate design consideration that befits the current context and maintains visual amenity. However, alternative colours can be selected at the council's request if this is deemed to be more acceptable.

At a localised level, the replacement equipment is capable of being absorbed into the immediate environment as the new pole and cabinets are positioned within the existing compound which is located in a secluded area away from the public highway. Taken as a whole the proposed alterations are considered minimal compared to the current context as the design layout strikes a balance between the site's technical requirements and visual amenity aspects. The slim design of the monopole will take a similar profile to the existing mast to be replaced which will reduce its noticeability in the street scene for local residents and passing traffic. Consequently, it is thought that visual amenity is not detrimentally impacted by this upgrade scheme but would in fact be maintained as a result of the minor development works. Although the base station is more discernible at a localised level, the simplistic design of the upgrade scheme will mimic a similar visual appearance to the current situation and the adjacent depot buildings will provide a suitable industrialised setting. As a result the applicant considers the proposal to be acceptable in regards to its siting and appearance.

Following on from this, the necessary height increase of the mast is not considered to significantly increase the site's visibility from wider vantage points due to its minimal nature and when taking into account the established nature of the existing mast and the surrounding built form it is thought that such views will remain insignificant to the local community. As noted previously the development area benefits from a backdrop of mature trees to the south and commercial buildings to the north which result in the site being isolated and well screened. In terms of long distance views, these features will largely prevent visibility of the site, especially towards the ground level cabinets and lower portions of the mast, which greatly reduce the site's potential prominence within the wider landscape perspective. The proposed development is therefore capable of being absorbed into the commercial setting of the depot whereby visual amenity is preserved as a result. This context reinforces the acceptable precedence for telecommunications equipment in this already established area. These circumstances should be taken into consideration in the assessment of this application.



As mentioned previously the proposed works will offer a minor visual change to the existing base station which is not demonstrably overbearing in its current state as illustrated in the above images. Whilst the base station may be a recognisable feature from certain viewpoints, the overall profile is small in scale due to the narrowness of the monopole and the lack of visibility towards the screened compound area. The applicant considers the proposed height increase to bear little significance when taking these factors into account. The current site appears inconspicuous when read in conjunction with the surrounding environment and is thus unobtrusive to the wider area. The congruent nature of the current base station is a transferable point that should be applied to the assessment of this application given the minor alterations proposed. These arguments should therefore be materially considered in the determination of this submission.

Following on from this, the proposal is not considered to adversely impact residential amenity despite the presence of dwellings in the wider surrounding area. The equipment is situated away from residential windows, the nearest of which being approximately 37 metres south of the site where the intervening trees prevent any direct influence on the natural enjoyment of daylight, privacy and outlook for these local residents. Given the relatively slim profile of the mast and the low height of the equipment housing the site does not demonstrate detrimental impact. Additionally, it should also be reiterated that the application site accommodates an existing base station in which precedence for telecommunications equipment at this location has been set and is also befitting of the industrialised surroundings. As well as this, the applicant's decision to upgrade an existing site as opposed to identifying a new location is in accordance with planning guidance so as to prevent undue harm to visual amenity and proliferation. Due to increased mobile network demands to improve coverage provision to the public it is necessary for the existing base station to be upgraded as part of the ongoing socioeconomic growth at both local and national levels. Therefore, the requirement for the upgrade proposed herein clearly illustrates great public benefit that should consequently be supported. In addition to this, the proposed upgrade does not incur an increase in footprint meaning there is no encroachment onto additional land.

In summary the proposed design is considered to be respectful of the surrounding elements and does not cause detrimental harm to the visual amenity of the immediate environment. The siting and appearance of this proposal is therefore within the boundaries of acceptability as it will cause minimal interruption to the current landscape and is in line with the NPPF of utilising existing sites and buildings. When taking into account the existing precedence for telecommunications equipment, the proposed upgrade displays a level of consistency with the current site which results in a similar extent of visual impact as the equipment presently in situ. Therefore, the applicant strongly believes the scheme demonstrates a sympathetic design that would not detract from the setting and character of the surrounding area and the proposed works are capable of being absorbed into the wider landscape. Overall it is considered that the scheme does not demonstrate substantial harm to the local area and in any event, it is argued that the public benefits of the proposal would outweigh any perceived harm. As the scheme seeks to introduce 5G technologies during a climate where economic recovery is paramount, the public benefits associated with this upgrade cannot be undervalued.

3. PLANNING POLICY CONSIDERATIONS

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that Local Planning Authorities should determine proposals in accordance with development plan policies, unless material considerations indicate otherwise. Material considerations may include, inter alia, central government guidance, High Court and Inspector's decisions etc.

3.1 LOCAL PLANNING POLICY

The following local planning policies are relative and have been considered in the submission of this application. It is argued that the proposal is in accordance with the below policies which promote high-quality connectivity and supports new telecommunications infrastructure when it can be demonstrated that the design and siting of the base station is respectful to its surroundings.

Policy CS16 High Quality Design

In accordance with this policy the proposed development is of a high quality design which is robust and sustainable. The applicant has adopted a minimalistic approach to ensure the overall scale, height and bulk of the proposal is appropriate within the context of the surrounding area. With this design process careful consideration is given to the existing visual amenity and any notable sensitive assets as the applicant recognises the importance of preserving such factors. In this instance an existing base station has been utilised in which an established precedence can be maintained.

Policy CS19 Effective Provision of Infrastructure

The council is committed to supporting the development of necessary infrastructure which is applicable to the proposed works submitted herein which seek to provide improved mobile coverage to the community. The public benefits to be provided will serve local residents, businesses and visitors for a variety of socioeconomic needs. As the application in question will utilise an existing base station, the applicant has also demonstrated an effective use of existing infrastructure.

3.2 NATIONAL PLANNING POLICY

This legislation was formally adopted in July 2018 and replaces the previous version which was introduced in 2012. In relation to this policy the following sections are relevant in determining this application:

Section 2 – Achieving Sustainable Development

Paragraph 7 – *“The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”*

The NPPF also encourages the achievement of sustainable development which can provide public benefits to building stronger and more competitive economic areas, as well as enhancing social communities through increased communication and connectivity.

Section 4 – Decision-Making

Paragraph 38 – *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”*

Section 6 – Building a strong, competitive economy

Paragraph 80 – *“significant weight should be placed on the need to support economic growth and productivity... this is particularly important where Britain can be a global leader in driving innovation.”*

Section 10 – Supporting high quality communications

Paragraph 112 – *“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.”*

In relation to these paragraphs, the Government’s Industrial Strategy sets out a vision to drive productivity improvements across the UK, and sets out a delivery programme to make the UK a leader in *“artificial intelligence and big data”*. The improvement of telecommunications capacity and provision of 5G is imperative to allow for areas to be connected, and is essential for economic growth.

Paragraph 113 – *“The number of radio and electronic communications masts, and the sites for such installation, 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... 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."

In relation to this paragraph, it is demonstrated that a sequential approach to site selection has been adopted to ensure that existing telecommunications installations have been explored in the first instance to prevent the proliferation of masts. A suitable existing base station was identified in this instance.

Paragraph 114 – *"Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:*

- a) They have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*
- b) They have considered the possibility of the construction of new buildings or other structure interfering with broadcast and electronic communications services."*

Paragraph 115 – *"Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:*

- a) The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and*
- b) For an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or*
- c) For a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met."*

In relation to this paragraph, the application is to upgrade an existing mast which has already been installed. An ICNIRP certificate is provided with this application to confirm that the proposal will not exceed International Commission guidelines. As the scheme is utilising an existing base station, it was not necessary to identify alternative site options.

Section 12 – Achieving well-designed places

Paragraph 124 – *"Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."*

In relation to this paragraph, the application seeks to upgrade an existing telecommunications site located at Wessex Self Drive Perm and the proposed equipment is the least amount possible to allow the site to transmit sufficiently; we therefore consider this design to be respectful to the character of the area. Although the site's change in appearance will to an extent be recognisable features of this street scene, efforts have been made to limit the visual impact on the surrounding amenity.

To conclude, the applicant therefore considers the proposal to be in accordance with local and national planning policies.

4. TECHNICAL JUSTIFICATION

In the assessment of this application, material weight should be given to the public benefits that will be provided to local residents and visitors in this area. The site will form part of an improved coverage network which will also introduce 5G technology to allow for faster download speeds and better signal.

More information on 5G can be found in the accompanying documents: *5G and Future Technology*, *Connected Growth Manual Digital Infrastructure* and *The Institution of Engineering and Technology's Guide for Local Planning Authorities Regarding 5G Masts and Small Cells*.

The demand and focus on delivering the 5th generation of mobile phone technology is the primary objective of licensed operators in the UK. In today's climate the existing 4G network has allowed users to video stream at much faster data speeds allowing the integration of smart phones into wider uses than previous generations. The inevitable consequence of technological advancements means that customers expect tasks to become even quicker and simpler.

To quote the *5G and Future Technology* document, *"It is estimated that 5G will directly contribute to an additional £7 Billion a year to the UK economy in just six years from roll-out. Although 5G will undoubtedly bring new opportunities and huge benefits to society, we cannot escape from the requirement that new structures, antennas and ancillary equipment will be needed. But to do so the network needs to be surveyed, designed and planning approval obtained. It has been acknowledged by Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks."*

The introduction of 5G technology will improve the country's digital connectivity and appeal to visitors and businesses alike through the creation of smarter technology which will benefit the British economy.

"Examples of this new world that will emerge from ubiquitous 5G coverage involves such things as connected and autonomous vehicles, traffic management, smart manufacturing with heterogenous autonomous machines, direct machine to machine communication, advanced medical devices, automated agriculture, far greater security provision, more stable and reliable connectivity and advances in further application development with uses not yet identified. All of the above provides an insight into the future development of connectivity in our modern world and also provides a further insight into the expected minimum eight-fold increase in data usage by each mobile operator over the next 5-6 years."

The national government recognises the importance of the 5G rollout which is a stance taken by government minister Margot James, the NPPF and The National Infrastructure Commission.

"5G has the potential to dramatically transform the way we go about our daily lives, and we want the citizens of the UK to be amongst the first to experience all the opportunities and benefits this new technology will bring...." – Margot James, the government minister for digital).

"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections." – NPPF (July 2018)

"Getting 5G deployment right will be critical in a future where connectivity is becoming integral to almost all parts of the economy, and the UK will put its future growth and competitiveness at risk if it falls behind." – 'Connected Future' National Infrastructure Commission 2016

Although Central Government understands that this may present concerns with the various design solutions proposed, it is important that all Local Planning Authorities understand the technical needs of 5G and better understands the wider advantages of such new technology. The government have also expressed support for new telecoms installations and the deployment of new technology. It is seen as essential for the country to develop and exploit the advantages of such new technology to the direct benefit of the public and the economy.

Coverage

The licence granted to EE and H3G demands that strict coverage qualities are met nationwide. It is essential that the benefits of mobile phones are available across the population. Mobile networks are constantly reviewed to ensure that there is adequate coverage and capacity to meet customer

demands. In the current environment there is an expectation for signal coverage to be available at home, in the workplace, while shopping, enjoying leisure activities or in transit.

Quality

In order to ensure there is sufficient coverage within buildings such as homes, shops, offices etc. the radio signal has to be of adequate strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, which are sometimes less than 1 km apart. The improvement of 3G and 4G signal and introduction of 5G in this area will encourage economic advancement in accordance with the NPPF which seeks to develop connected environments.

Capacity

The upgrade of telecommunications masts across the country is an inevitable consequence of the continued growth of mobile phone usage. More sites are required to address the increasing traffic demands of each mobile user for tasks such as video or music streaming. Each cell or base station is limited to handling a finite number of calls meaning that areas of high usage will require additional cells to meet network demands and avoid congestion.

The Radio Implication of the Site

Radio signals are transmitted through the network by using fixed links at such frequencies that necessitate an uninterrupted line of sight. To achieve this, the installation must reach a sufficient height above surrounding buildings and trees. The installation must also be in a position to provide strong radio coverage to the target area that can also be received inside buildings. The radio planning tool identifies deficiencies in the network and predicts the location from which the optimum coverage will be provided. Within these areas existing base stations are selected for an upgrade. The proposed installation subject to this application stems from this process where it is imperative for mobile operators to provide high quality coverage to its customers. This is achieved through the improvement of existing network infrastructure and introduction of new base stations to fill in blank spots.

5. HEALTH AND SAFETY

The proposal for this site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines and therefore Health and Safety concerns should not be a planning consideration. An ICNIRP certificate is submitted with this application.

In addition to this, The Institution of Engineering and Technology's *Guide for Local Planning Authorities regarding 5G Masts and Small Cells*, provides a brief overview of 5G technology and the health issues that are often misunderstood. It concludes by saying, "Small 5G base stations in our towns and cities will allow improved network coverage. They will reduce radio wave exposure to individual smartphone users and improve local 5G capacity for all manner of useful bandwidth-hungry applications. And a good 5G fibre base local broadband infrastructure will be important to local communities over the coming decades in view of the ever-increasing amounts of data being consumed by the general public."

6. CONCLUSION

A requirement for improved network coverage has been identified in this area. This is an upgrade of an existing site which will provide essential services for residents and businesses within the immediate vicinity. The proposed works have been designed sensitively in consideration for the character and appearance of the surrounding area in which the least amount of works has been proposed to minimise the visual impact of the proposal.

The applicant considers the proposal to be an acceptable development which should be viewed favourably by the local planning authority.