

5G SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION STATEMENT PREPARED BY DOT SURVEYING
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1. Site Details

Site Name:	Elm Grove Street Works	Site Address:	Elm Grove, South Hayling, Hampshire, PO11 0NN
NGR:	E: 472222 N: 099845		
Site Ref Number:	HVT17846	Site Type:	Proposed 5G telecoms installation: H3G Phase 8 15m high street pole c/w wrap-around cabinet and 3 further additional equipment cabinets.

2. Pre-Application Check List

Site Selection

Was the Council's mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why:		
It was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why:		
N/A		

Pre-application consultation with the Local Planning Authority

Written offer of pre-application consultation:	N/A
Was there pre-application contact:	Yes
Date of pre-application contact:	5 th July 2021
Name of contact:	Email issue to the Local Planning Department.
planning.development@havant.gov.uk	

Summary of outcome/Main issues raised:

CK Hutchison Networks (UK) Ltd is committed to providing improved network coverage and capacity, most notably in relation to 5G services. In these unprecedented times of the Covid-19 pandemic, it is recognised that high-speed mobile connectivity is the lifeblood of a community; facilitating educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and facilitating the increased need and demand for working from home, as well as enjoying access to social, media and gaming for leisure time activities.

The pre-consultation invited comments within a two-week period and while the merits of high-speed telecommunications are generally recognised; pre-application has identified the need to carefully consider the risk of increased visual amenity to adjoining residential properties through the siting of telecommunications infrastructure within urban settings.

The e-mail communication included a set of planning drawings, site information sheet and an explanation behind the requirement for a new telecommunications installation. The information sheet also included other sites that have been investigated and discounted. Further details of the discounted sites are included within this document.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:

Amber

Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss development proposals and identify site specific issues.

Summary of outcome/Main issues raised:

An application for prior approval was lodged on the 21st July 2021 for a telecommunications installation comprising of an 18 metre high telecommunications pole with built-in cabinet and 3no. separate cabinets, upon the footpath situated at Elm Grove, South Hayling, Hampshire, PO11 0NN (Application Ref:APP/21/00784). The application was subsequently refused on the 2nd September 2021, for the following reasons:-

"1. The proposed development, by reason of size, siting, scale, design and appearance would appear as a visually intrusive and incongruous feature in the street scene. It has not been sited or designed in a way that would minimise the impact of the development and, as such, would result in an adverse impact upon the visual amenities of the street scene and the appearance of the locality. In addition, the occupiers of nearby properties would be adversely affected by their awareness of the incongruous appearance of the development within the street scene.

Due to the siting of the proposed development, it would result in unacceptable highway safety concerns and would also block access to Sheffield bike stands hindering the encouragement of sustainable transport

As such, the proposed development is contrary to Policies CS1, CS20 & CS16 of the Havant Borough Local Plan (Core Strategy) March 2011, Policy E1 of the submission version of the Havant Borough Local Plan and the National Planning Policy Framework 2021."

The scheme has since been amended to incorporate a significantly shorter telecommunications pole of 15 metres in height with built-in cabinet and 3no. separate cabinets. A new application is therefore being lodged in respect of the revised development and full details of the scheme are outlined within the planning drawings (HVT17846_PLANNING_REV_B).

Determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, as well as the objectives of the National Planning Policy Framework (February 2019).

It is our opinion that the proposed design presents a better 'fit' within the local community and immediate street scape, offering a reduced visual impact upon an area of adopted highway. It is considered that the design and siting, accords with Local Authority's critical role in delivering the UK Government's Digital connectivity vision and provides a basis for the local planning authority to support the request for plans to speed up digital infrastructure rollout set out by Ministers on the 27th August 2020.

School/College

Location of site in relation to school/college:

Having conducted a review of the area Mengham Infant School (approximately 210m from proposed site) and Mengahm Junior School (approximately 270m from proposed site).

Outline of consultation carried out with school/college:

Both above mentioned education institutions were issued a copy of the pre-application enquiry – site detail sheet by email.

Summary of outcome/Main issues raised:

To the best of our knowledge no formal response was received from the schools.

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? N/A		No
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	11 th October 2021	

3. Proposed Development

The proposed site:

CK Hutchison Networks (UK) are in the process of supporting the UK Government's Digital connectivity objective and providing a critical role in building the UK's fastest mobile network to provide improved coverage and capacity, most notably in relation to 5G services.

The technical details of this proposal are illustrated within application design drawings as attached.

The very nature of installing new 5G mast infrastructure within such an urban setting requires a highly considered balance between the need to extend practical coverage reach with that of increasing risk of visual amenity intrusion. In this location, existing mast sites are not capable of supporting additional equipment compliment to extend coverage reach across the target area and prospective 'in-fill' mast sites are extremely limited.

There is an acute need for a new base station to provide effective service coverage and in this case, the height of the proposed street pole is the minimum required to bring the benefits of 5G to this area.

CK Hutchison Networks (UK) Ltd are in the process of building the UK's fastest 5G network and has 140MHz of 5G spectrum (and 100MHz of it contiguous), which means our service will be much faster and shall have the ability to handle more data. In making this technology available to customers, CK Hutchison Networks (UK) Ltd will need to provide a mix of upgrades involving existing sites and the building of new sites. New sites will be needed for many reasons, including the higher radio frequencies used for 5G, which do not travel as far as those frequencies currently in use. In addition, not all existing sites will have the capacity of being upgraded.

The very nature of 5G and the network services it provides, means the equipment and antennas are quite different to the previous and existing, service requirements. In particular, the design of the antennas, and the separation required from other items of associated equipment, is such that we cannot utilise certain structures that provide an installation for another operator, most notably in a street works or highways environment.

The search process involved an initial 'desk-top' survey to ascertain and identify major constraints and impediments, followed by a physical search of the area. As with all 5G cells, this is an extremely constrained cell search area and options within the area are extremely limited. Nevertheless, the most viable solution that minimises amenity issues, has been put forward. The site selection process has also been influenced by the topography of the area, pavements and vertical elements of street furniture distributed around the vicinity of the site.

The site itself is situated upon a reasonably wide section of footpath and has been very carefully set alongside an existing lamp post, which we consider will provide a degree of screening. The design itself is typical of street furniture found in such urban locations. Furthermore, and having re-assessed the scheme following the recent planning refusal the height of the pole has been substantially reduced from 20 to 15 metres.

Figure 1 - Site Photograph's



Proposed location of a new mast shown above will assimilate well into the immediate street scene and not be detrimental.

The proposed site option is considered the best available compromise between extending 5G service across the target 'coverage hole' with the selected street works pole height and associated antenna and ground-based cabinets restricted to the minimum height which is capable of providing the required essential coverage.

The equipment cabinets are located at the base of the new pole and (unless the site is located in Article 2 (3) land), such installations are deemed Permitted Development without Prior Approval and therefore do not form part of the proposal from a planning consideration perspective as set out in the undernoted planning analysis:

Planning Policy Relevant to the Development Site:

Development Plan Policy: National Planning Policy Framework (February 2019)

The relevant Local Plan against which the application will be determined, is Havant Borough Local Plan 2011.

Telecommunications including Broadband	
Planning authorities are expected to support the expansion of electronic communications	The Effective Provision of Infrastructure Policy specifically facilitates the development of broadband and

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Draft Havant Borough Local Plan 2036 | January 2018

Conclusions and actions from the Draft Infrastructure Delivery Plan	How the Draft Local Plan has taken these forward
networks, including telecommunications and high speed broadband when preparing local plans. Developers should be encouraged to make provision for super-fast broadband in any new development from the outset, designing in networks to the layout of the development and ensuring installation during the construction phase. Developers should be encouraged to engage with service providers at the pre-application stage, through specific reference in their Infrastructure Delivery Statement that accompanies their planning application.	wifi infrastructure networks. It also refers to the need to provide necessary infrastructure for end users as part of development as well.

- Extract from Havant Borough Local Plan 2011.

The Adopted Roads Register shows that the proposed location falls within adopted Highway.

The National Planning Policy Framework (NPPF) section of this Supporting Statement goes into detailed analysis of why this site is in compliance with the NPPF.

Policy Analysis:

Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 124) of the National Planning Policy Framework. It states:

“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 keeping with the National Planning Policy Framework (NPPF) guidelines of using: “high quality communications” (Section 10), the proposed design has been selected to minimise visual impact upon the streetscape by integrating with the existing built environment.

The design of the proposed antenna and ground-based cabinets is considered to be the least visually intrusive option available. Whilst it is accepted that there will be a localised visual increase through the installation of additional apparatus, it is considered that this will not overly detract from the character of the existing streetscape.

Enclosed map showing the cell centre and adjoining cells:

The optimum solution from the perspective of cell planning and radio coverage has been put forward. The target Search Area (shown as by the red outline) and existing CK Hutchison Networks (UK) Ltd sites are illustrated within Figure 4 below:

Figure 4 - Coverage Map: Proposed installation must be located close to the area shown below.



Type of Structure

Description:

Proposed Phase 8 Monopole c/w wraparound Cabinet at base.

Overall Height:	See drawings
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Height of existing building	N/A
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Equipment Housing:

Length:	See drawings
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Width:	See drawings
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Height:	See drawings
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Materials

Tower/mast etc. - type of material and external colour:	See drawings
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Equipment housing - type of material and external colour:	See drawings
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Reasons for choice of design:

The proposed installation is an H3G LTE (Three) Phase 8 Monopole c/w wrap-around cabinet and 3 no. additional equipment cabinets which will support the UK Government Digital connectivity vision and provide a basis for support from the local planning authority to speed up digital infrastructure rollout set by Ministers on 27 August 2020. Such development will facilitate educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home as well as enjoying access to social, media and gaming for leisure time activities.

In accordance with the requirement set within National Planning Policy Framework (February 2019) guidelines; the proposed 'Streetworks' design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture. While it is appreciated the telecommunications pole will be larger in comparison to the lamp posts on Elm Grove Road and the surrounding area, the structure has an important function in terms of supporting the necessary telecommunications equipment. Furthermore, the radio antennas (housed within the pole) will transmit and receive radio signals to and from mobile handsets and other wireless devices. To operate efficiently, the radio antennas must be clear of obstructions such as buildings and trees, which is why the pole stands slightly above the surrounding properties. Nevertheless, every effort has been made to keep the height of the pole to an absolute minimum and following the refusal of the initial application for prior approval the height of the proposed telecommunications pole has been substantially reduced from 20 to 15 metres.

4. Technical Information

ICNIRP Declaration attached

Yes

ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). 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.

5. Technical Justification

Reason(s) why site required

The National Planning Policy Framework (NPPF) clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this, the Applicant considers it to be important to explain the positive technical justification for the site and how the facility fits into the overall network.

The site is required to provide new 5G coverage for CK Hutchison Networks (UK) Ltd, improving service in and around this area subject to this application. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 50m.

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

Discounted Options

In accordance with the sequential approach outlined in the NPPF, the following search criteria have been adopted. Firstly, consideration is always given to sharing any existing telecommunication structures in the immediate area, secondly; consideration is then given to utilising any suitable existing structures or buildings and thirdly, sites for freestanding ground-based installations are investigated.

This sequential approach is outlined below:

- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPPF, all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Mast Data register is always examined prior to the submission of a planning application.

Discounted Options and National Planning Policy:

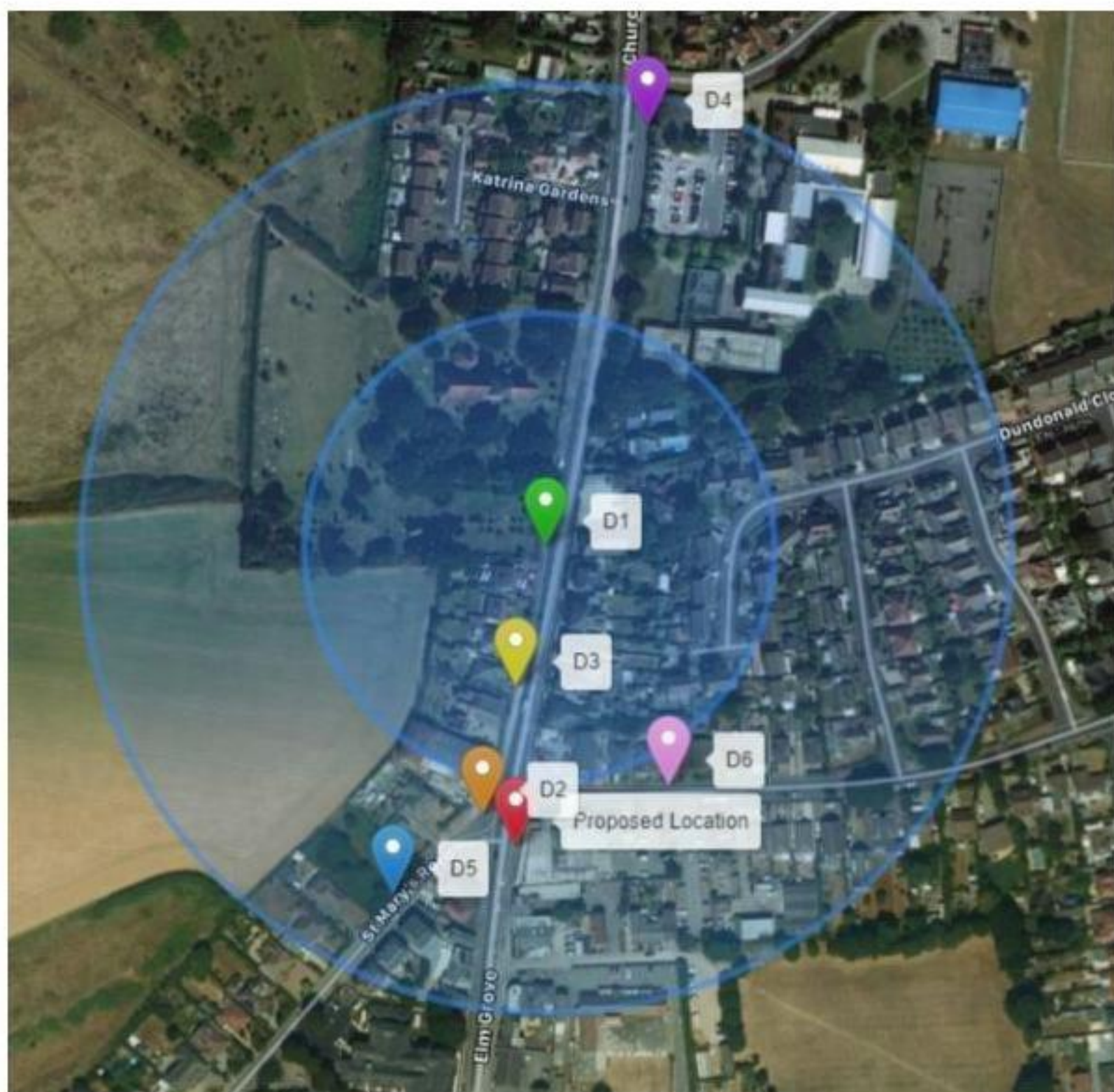
The National Planning Policy Framework (NPPF) is clear that LPAs should not question the need for the installation under Part 116:

“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure”.

Typical to most 5G cell site deployment within the urban environment, this is an extremely constrained cell search area. It is recognised that the very nature of installing new 5G mast infrastructure within a dense urban setting requires a well-considered balance between the need to extend practical coverage with that of increasing risk of visual intrusion. A street pole with associated cabinets is deemed to be the only and most appropriate solution available. The DSA (Designated Search Area) is illustrated herein, together with site locations that were investigated and subsequently discounted.

Discounted Options:

Site	NGR	Discounted Reason
D1 – Church Road	E 472233 N 099974	Pavement not wide enough to house SW, Power cables also are in the vicinity. Location also on a residential street.
D2 – St Marys Road	E 472208 N 099859	Pavement is wide enough; however, it appears to be an entrance to a commercial premises.
D3 – Tournebury Lane	E 472221 N 099914	Pavement not wide enough to house SW, Power cables also are in the vicinity. Location also on a residential street.
D4 – Hayling College	E 472274 N 100156	Too close to a school and sits opposite a residential house.
D5 – St Mary Road	E 472169 N 099824	Pavement not wide enough to house SW, Power cables also are in the vicinity. Location also on a residential street.
D6 - Tournorbury Lane	E 472288 N 099872	Pavement not wide enough to house SW, Power cables also are in the vicinity. Location also on a residential street.



7. Additional Relevant Information

Background to the Proposal

CK Hutchison Networks (UK) Ltd supports Government ambition to be a global leader in the next generation of mobile technology set out within its March 2017 white paper, 'Next Generation Mobile Technologies: A 5G strategy for the UK' and expand its mobile network across the local planning authority area and specifically in this instance, to enhance 5G coverage levels in and around the site subject to this application.

Modern mobile phone base stations operate on a low power and accordingly, need to be located within close proximity to the areas they are required to serve. Increasingly, people are also using mobile devices in the home which requires the installation of base station infrastructure closer to such residential areas.

DEVELOPMENT PLAN POLICY:

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, stated that:

“Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise.”

NATIONAL PLANNING POLICY:

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF July 2018) sets out the Government's planning policies for England and how these are expected to be applied at the Local level. It provides a framework within which local people and their representative Councils can shape distinctive local and neighbourhood plans, which reflect the needs and priorities of their own communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including;

- Economic Role - contributing to building strong, responsive and competitive economy;
- Social Role - Supporting strong vibrant and healthy communities; and
- Environmental Role - Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. The NPPF recognises the vital importance of high-quality telecommunications and dedicates a whole chapter to this area. Chapter 10 of the NPPF outlines the Governments support for high quality communications. The paragraph extracts highlighted below, clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 112 states:

“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. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).”

It continues in Paragraph 113

“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."

Operators always follow the sequential site selection process. Where an existing site can be shared or upgraded, this will always be adhered to before a new installation is put forward for consideration. In this instance, there is no scope to upgrade existing infrastructure or site share with other operators.

The support for telecoms and the need not to constrain Operators is laid out in Paragraph 116

"Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure."

In addition to the above, we would also draw to your attention a recent Appeal Decision which followed on the back of a refused planning application within Walworth, London, SE17 3DU. The application (ref: 20/AP/1187) was refused on the following grounds: - 1) The 20m monopole does not comply with part (a) of Part A.1 of 16 of the GPDO 2015 and 2) The proposed cabinets and monopole would introduce excessive clutter on the footway, disrupting pedestrians. The appeal was brought by Hutchison 3G (UK) Ltd against the Council of the London Borough of Southwark. The appeal was allowed on the 10th November 2020 (Appeal Reference: APP/A5840/W/20/3254830).

Conclusion

Government considers that high-speed mobile connectivity is the lifeblood of a Community. CK Hutchison Networks (UK) Ltd is committed to providing improved network coverage and capacity, most notably in relation to 5G services.

Taking into account the site-specific factors and technical constraints, available options and planning constraints, it is considered that the proposed street pole clearly represents the optimum environmental solution to extend coverage to the target Community.

The use of the public highway to accommodate a new telecommunications installation complies with both central government and local planning policy guidance, where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community, while minimising visual impact. In this particular instance, following an initial desktop survey and subsequent physical search of the intended target/search area, due to the characteristics of the area, the nature of the proposed equipment, site characteristics (reasonably wide pavement), along with the presence of existing street furniture, after careful analysis, we believe the proposed site will minimise any visual impact upon the immediate and wider area, while significantly improving communications within the local vicinity. The structure height has also been significantly reduced following the initial planning application.

In accordance with a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the National Planning Policy Framework.

On this basis, favourable determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015.

Contact Details

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Signed:		Date:	11 th October 2021
Position:	Planner	Company:	Dot Surveying Ltd
		(On behalf of above operator)	