SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	New Salts	Site Address:	Land off Cecil Pashley Way, Shoreham-By-Sea, West Sussex, BN43 5PA
National Grid Reference:	E: 520801 N: 105172		
Site Ref Number:	CTIL_207329_TF_76824_34919	Site Type:[1]	Macro

2. Pre Application Check List

Site Selection (for New Sites only)
(would not generally apply to upgrades/alterations to existing sites)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	
If no explain why:		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why:		

Annual Area Wide information to local planning authority

Date of information submission to local planning authority	Annual area wide information submitted to LPA 13 October 2015.
Name of Contact	Gary Peck and Steve Collins
Summary of any issues raised:	

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	8.7.2016	
Was there pre-application contact:		Yes
Date of pre-application contact:	19.7.2016	
Name of contact:	Gary Peck	

ADUR & WORTHING
PLANNING SERVICES

PLAN	AWDM/ 1429/16.
DATE VALID	20 SEP 2016

[1] Macro or Micro

Summary of outcome/Main issues raised:
The planning services manager advised that the site is likely to raise concern with the Local Planning Authority. Although partially screened by the railway bridge to the south, the mast would be widely visible from the north to the detriment of the visual character of the area. Following these comments, the applicat has reviewed the required height and reduced it by 1m to 20m to the top of the proposed structure and a monopole structure was also offered as an alternative, which the planning officer may consider to be more appropriate. There is an existing mast nearby and while you state that this mast cannot be shared for legal reasons it is felt to be unsatisfactory to have 2 masts in reasonable proximity in this location. This comment has been addressed on the basis of commercial considerations and may be seen in the pre-consultation section. The planning services manager notes that the proposed site appears to be very close to the Adur Tidal Walls flood defence scheme which was recently granted planning permission. If you have not already done so, then you should contact the Environment Agency for their comments. This has been addressed and may be seen in the pre-consultation section.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	~~Red~~	Amber	~~Green~~
Outline Consultation carried out: Consultation with local Ward Councillors' for Marsh Barn (Cllrs L Haywood and D Lambourne) County Councillor D Kennard and the local MP Tim Loughton. Pre-application consultation letters and drawings of the proposals were sent to these parties on the 8.7.2016.			
Summary of outcome/Main issues raised: No specific responses have been received to date.			

School/College

Location of site in relation to school/college: No schools or nurseries nearby.
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?		Yes
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		Yes
Details of response: No reply to date		

Developer's Notice

Copy of Developer's Notice enclosed?		Yes	
Date served:	16.09.2016		

3. Proposed Development

The proposed site:
Background Telefónica UK Ltd has entered into an agreement with Vodafone Ltd pursuant to which the two companies plan to jointly operate and manage a single network grid across the UK. These arrangements will be overseen by Cornerstone Telecommunications Infrastructure Ltd (CTIL) which is a joint venture company owned by Telefónica UK Ltd and Vodafone Ltd ("the operators"). The agreement allows both organisations to pool their basic network infrastructure, while running two, independent, nationwide networks allowing consumer choice. As part of Telefónica's 4G license obligation to provide 98% coverage by 2017, Telefónica is also in the process of progressing a number of suitable sites for radio base stations, which will provide 4G coverage to current 'not spot' areas. This is fully in line with the Government's aim to ensure that everyone is connected to the information superhighway. **Proposed Development** CTIL and Telefónica UK Limited are looking to progress works which will entail the installation of a new 19m lattice tower supporting 3 no. antennas, 2 transmission dishes, 3 equipment cabinets and ancillary development thereto. The proposal is required to provide improved 2G/3G coverage and new 4G coverage where currently there is no indoor coverage within the cell area. The new site will enable a single network grid supporting modern MORAN technology for Telefónica UK Limited. The site will be operated by CTIL and Telefónica UK Limited but will enable both Telefónica and Vodafone to provide MORAN services to the surrounding area.

2016 CTIL

Enclose map showing the cell centre and adjoining cells:
The enclosed coverage plots clearly show that the existing Vodafone coverage would be largely replicated at the new proposed location with the added benefit of providing coverage for Telefonica (O2) also. Whilst the applicat has reduced the height of the proposed installation following pre-application feedback, it can clearly be seen tat reducing to 15m would reduce coverage to the urban areas generally but more crucially would leave coverage gap along the A27 whils also reducing the coverage delivered out to sea, both of which are vital in emergency situations.

Type of Structure: Lattice Tower		
Description: The proposed development relates to the installation of a 19m lattice tower on 1m high base (top height 20m) supporting 3 no. antennas, 2 no. transmission dishes, 3 no. equipment cabinets and 1 no. meter cabinet at ground level and ancillary development thereto including a 2.4m high palisade fence to form a compound. Details of the proposed equipment are detailed below.		
Overall Height: top of lattice tower		19 Metres (20m top height of antennas)
Height of existing building :		N/A
Equipment Housing: ISC (x1)		
Length:		0.500 Metres
Width:		0.600 Metres
Height:		1.645 Metres
Equipment Housing: Flexi Rack (42U) (x2)		
Length:		0.750 Metres
Width:		0.600 Metres
Height:		1.975 Metres
Materials:		
Tower/mast etc – type of material and external colour:	Lattice tower – Galvanised	
Equipment housing – type of material and external colour:	Grey	
Reasons for choice of design:		
The site is located on private land, adjacent to the railway, some distance from the public arena and residential areas. Therefore a lattice tower design is proposed in this location as it is the most efficient way of providing the required coverage and capacity, limiting the need for additional structures in the surrounding area. The proposed design is able to support all the MORAN technologies in one installation. It also allows for the expansion and improvement of the electronic communications network, where necessary, to continually maintain a high quality telecommunications service in line with its license obligations and the aims of the national Government to provide a high quality superfast highway network. The top antenna height of 20m is required in order for the apparatus to maintain a clear line of sight allowing the installation to link in to the grid network and provide indoor coverage to the cell search area. It will also enable the operator's multi technologies to be provided to the		

surrounding local area.

Two transmission dishes are required in order to establish a link in to the network. A minimum centre line height of 16.5m is required in order to provide a clear line of sight and ensure that the radio base station can operate effectively.

The proposed equipment cabinets are considered small for telecommunications equipment, less than 2.5m^3, and as such will not be prominent in the wider landscape. These new equipment cabinets will house the operators' MORAN technology equipment. The equipment cabinets are ancillary to the functionality of the antennas and are proposed to be painted grey a similar colour to the existing infrastructure nearby.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the MORAN technical requirements for the site. Taking all matters into account it is considered that this proposal, to fill a large hole in high quality indoor coverage, delivering the capability for a MORAN service from a single network installation, would not appear out of place within the landscape.

4. Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)* International Commission on Non-Ionizing Radiation Protection 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 or near the site are taken into account.	Yes	
In order to minimise interference within its own network and with other radio networks, Telefónica UK Ltd 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 Telefónica UK Ltd's network, 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

Enclose predictive coverage plots if appropriate e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

Reason(s) why site required e.g. coverage, upgrade, capacity:
A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the county. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are. There is a specific requirement for a new radio base station at this location to allow Telefonica to provide new 4G services to the surrounding area. This ensures high quality indoor coverage is provided. The enclosed coverage plots show that there is a deficiency in Telefonica coverage to this cell area. This means that Telefonica customers, for the large part, are unable to utilise their 4G enabled handsets for the purposes in which they were purchased. This is contrary to the operator's 4G license obligation, as well as the national Government's aim to provide a high quality communications network throughout the country.

6. Site Selection Process – alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

In accordance with the licence obligations and advice in the National Planning Policy Framework and the Code of Best Practice in England the applicant's network rollout team investigated the following siting and design options using this sequential approach to site selection:

- Upgrading their own existing base stations;
- Using existing telecommunications structures belonging to another communications operator. i.e. Mast and/ or site sharing, co-location;
- Installations on existing high buildings or structures including National Grid pylons;
- Using small scale equipment; and finally
- Erecting a new ground based mast site – (1st) Camouflaging or disguising equipment. (2nd) A conventional installation e.g. a lattice mast and compound.

Site	Site Name and address	National Grid Reference	Reason for not choosing
Existing Site	Shoreham Airport Cecil Pashley Way, Shoreham-by-Sea, West Sussex BN43 5FF Shoreham by Sea West Sussex BN43 5FF	E:520393 / N:105073	This is an existing Airwave site (cell ref: SUS064A), utilised for the emergency services airwaves. Vodafone are also currently located on this site (cell site ref: 34919) providing 2G and 3G coverage to the surrounding area. This site was fully explored to be upgraded to enable Telefonica to utilise the same site. However, this site is not available for legal reasons. Therefore an alternative location is required which is available and suitable for both Vodafone and Telefonica in line with their joint agreement to utilise the same network infrastructure.
GF – Greenfield	BMX Track Adur Recreational Ground Shoreham West Sussex BN43 5FF	E520913 / N105128	This site was fully considered for the installation of a telecommunications installation. However, following further investigations, the land is not available for a radio base station, due to redevelopment plans for the site.
GF – Greenfield	NR New Salts Farm Road Shoreham West Sussex BN43 5PA	E 520140/ N 104949	This site was fully considered for the installation of a telecommunications installation. However, following further investigations, Network Rail have confirmed that the site is not available for a telecommunications installation as the land owner has redevelopment plans for the site.
GF – Greenfield	Dog Trust Brighton Road Shoreham West Sussex BN43 5LT	E 520720/N 104854	This site was fully considered for the installation of a telecommunications installation. However, the Land owner showed no interest in the prospect of a mast on the land when approached. Therefore the land is unavailable for the operators and as a result has to be discounted for these reasons.

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

Land use planning designations

See below for details

Additional relevant information (planning policy and material considerations)

See below for details

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

It is not necessary to quote extensively from this document but the following points are highlighted.

National Planning Policy Framework (March 2012)

The governments National Planning Policy Framework (NPPF) was published on 27 March 2012 and consolidates the majority of planning policy documents into a single circular (including PPG8, and PPS1). The Government's latest thinking strongly supports communications infrastructure. Paragraph 42 of the framework document sets out the objectives of the Communications Infrastructure. It states 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'.*

Paragraph 43 states that '*Local Planning Authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband*'. It goes on to acknowledge that the numbers of radio and telecommunications masts and the sites for such installations should be kept to the minimum consistent with the efficient operation of the network. The NPPF supports the use of existing masts, buildings and other structures, unless the need for a new site has been justified. It goes on to state that where new sites are required, the equipment should be sympathetically designed and camouflaged where appropriate.

NPPF paragraph 46 sets out a clear message to local planning authorities on health issues and the need for telecommunications systems. It states that '*local planning authorities 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*'.

Throughout the NPPF there is strong support for sustainable development which is summed up in paragraph 14 which states 'At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking.

Code of Best Practice on Mobile Phone Network Development in England (July 2013)

The Code of Best Practice provides guidance primarily to mobile network operators, their

agents and contractors and to local planning authorities in England.

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure is achieved in a timely manner, but in a way that also minimises the potential impact that can be associated with such development. It provides clear and practical advice to ensure the delivery of significantly better and more effective communication and consultation between operators, local authorities and local residents.

The Code highlights that the mobile telecommunications network is a crucial piece of national infrastructure in both economic and social terms. It acknowledges that the pressure on networks to upgrade and improve networks through changes to existing sites and the development of new sites is constant. With the increasing consumer demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity. This is due to the ever increasing demand for data hungry applications to be available to a range of connected devices, such as smartphones and tablet computers. However, The Code notes that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which they rely.

The Code acknowledges that the operators anticipate largely using existing network infrastructure for the provision of 4G services and are similarly upgrading their 2G and 3G network infrastructure to improve capacity and coverage. However, the Code goes on to state that this does not mean that there will not be a need for new base stations. More base stations will be needed in areas where there has previously been only limited or no coverage, and where coverage and capacity needs to be enhanced in line with Government Policy and customer demand or where sites have been lost for example due to redevelopment.

Mast and site sharing continues to be supported within both Government policy and the Code of Best Practice. The Code acknowledges that shared sites will tend to be slightly bigger, but fewer sites will be needed overall to improve coverage and capacity.

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise"

The development plan as defined by the Planning and Compulsory Purchase Act 2004 for Adur District Council comprises the saved policies contained within the adopted Adur Local Plan.

Adur District Local Plan (1996)

The Adur District Local Plan was adopted in 1996. The policies within the adopted plan were automatically saved on commencement of the Planning and Compulsory Purchase Act 2004 for 3 years. The Secretary of State has since issued a direction to save a number of policies beyond this 3 year period until superceded by policies in the emerging Local Plan. As such the saved Local plan policies will continue to form the basis in which planning decisions are made until they are replaced by new policies when the emerging Local Plan has been fully adopted.

Saved Policy AB29 'Other Telecommunications Development' is the relevant policy for

determining telecommunications development proposals. The policy states that planning permission will be granted for telecommunications development where it can be demonstrated that:

i) Planning permission is required from the District Planning Authority;
ii) There is no reasonable possibility of sharing existing facilities, and
iii) In the case of radio masts there is no reasonable possibility of erecting antennas on an existing building or other structure.

The policy goes on to state that whilst respecting operational requirements, the LPA will expect the apparatus to be sited, designed and where appropriate, landscaped. Such masts would not be permitted where they would be visible in the wider landscape within the Area of Outstanding Natural Beauty except where special siting needs attributable to technical requirements, such as transmission range or line-of-sight, dictate otherwise.

In the justification to the policy it is acknowledged that the Governments General Policy on telecommunications is to facilitate the growth of new and existing systems. Local Planning Authorities are urged to respond positively to telecommunications development proposals, especially where the proposed location is constrained by technical considerations, while taking advice on the protection of urban and rural areas.

The first Development Plan Document currently being prepared as part of the Local Development Framework is the Adur Local Plan – Emerging.

Amendments to the Proposed Submission Adur Local Plan (2016)

The emerging Local Plan is expected to be submitted to the Secretary of State in July 2016 with adoption expected in early 2017. Therefore the emerging Local Plan is at the latter stages of production. Its contents therefore have some material weight in the determination of planning applications.

Policy 38 of the emerging Local Plan relates to telecommunications and will eventually replace Policy AB29 of the adopted Local Plan. The policy supports the expansion of electronic communication networks including high-speed broadband connections. Proposals should demonstrate that:

- All opportunities for mast sharing, or the use of existing buildings or structures have been thoroughly assessed; and
- There are no satisfactory alternative sites available.

All applications for telecommunications development should be accompanied by the necessary evidence to support development, including evidence that demonstrates that the proposal is the least environmentally harmful option, and includes a statement that self certifies that the cumulative exposure will not exceed the guidelines of the International Commission on Non-Ionising Radiation Protection.

The policy seeks to ensure that all telecommunications development are sited and designed so that they result in acceptable visual impact.

Policy 1 relates to sustainable development and echoes NPPF guidance, such that the Council will take a positive approach that reflects the presumption in favour of sustainable development. The Council will work proactively with applicants to jointly find solutions which

mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications which accord with the local plan will be approved without delay, unless material considerations indicate otherwise.

The emerging Local Plan is intended to address a number of key issues that will affect Adur up to 2031 and beyond including:

1) The need to facilitate the regeneration of Adur. The Local Plan acknowledges that there is a need to diversify the economy, provide more opportunities for businesses to locate in to or expand in Adur. Adur DC is part of the Greater Brighton City Deal, which aims to prioritise economic growth. The Council is also working with other agencies and stakeholders with regards to other sites and issues, including the delivery of infrastructure.
2) The need to improve infrastructure – Some of Adur's infrastructure is outdated and inadequate to meet modern needs.
3) The need to work towards achieving sustainability to help address climate change and make efficient use of limited resources.

One of the key visions for Adur is that residents will enjoy an improved quality of life via inter alia new and improved local services and community infrastructure.

Paragraph 2.73 of the emerging Local Plan acknowledges that small regional airports, such as Shoreham Airport, play a valuable role in the local economy. This airport is the oldest licensed airfield in Britain and is home to a wide range of general and commercial aviation activities, related engineering operations and training. Shoreham Airport is an important is an important part of Britain's aviation heritage, a key business centre and a popular visitor attraction.

Paragraph 2.74 notes that the Adur Employment Land Review Update states that Shoreham Airport represents a key opportunity for economic development and growth as it can attract high value activities, capitalising on the existing business cluster and key high profile employers, such as Ricardo.

Paragraph 4.83 defines the term infrastructure and includes utilities. This application is an essential item of utilities infrastructure.

Emerging Policy 30 relates to delivering infrastructure and states that the Council will work with partners including infrastructure and service providers and stakeholders to ensure that the necessary physical, economic, social and environmental infrastructure is provided to support development.

Proposals by service providers for the delivery of utility infrastructure to meet the needs generated by new development and by existing communities will normally be permitted.

Telecommunications development proposals are therefore determined in line with saved policy AB29 of the adopted Adur Local Plan and national guidance set out in the NPPF. Other material considerations are emerging policies 38, 30 and 1 of the Amendments To The Proposed Submission Adur Local Plan (2016), and The Code of Best Practice.

The paragraphs below set out how the proposed telecommunications scheme fully complies with local and national planning guidance.

The proposed telecommunications mast, new equipment cabinets and transmission dishes fully comply with the objectives of the NPPF, policy AB29 of the adopted Local Plan and Policy 38 of the emerging Local Plan. Government guidance states that in order to limit visual intrusion the number of radio and telecommunication masts and the sites should be kept to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need of a new site has been justified [NPPF para 43]. Similarly saved Policy AB29 of the Local Plan and emerging Local Plan Policy 38 supports the utilisation of the same installation by two operators.

The site has been chosen in this location because, for legal reasons, the existing Airwave monopole (cell ref: SUS064A) with exposed antennas supporting Vodafone equipment cannot be upgraded and therefore does not meet the operational needs of the Operators. As a result, a parallel new site is required to enable Telefonica to provide new 4G services to the surrounding area in line with its 4G license obligations and improved 2G/3G services. Currently this operator does not have indoor coverage to Shoreham Airport and this part of Shoreham-By-Sea. It will also enable improved 2G and 3G services for Vodafone and new 4G coverage, where there is currently no indoor 4G coverage.

This new installation would allow both operators to utilise the same radio base station and enable the existing Vodafone equipment on the Airwave site to be removed. Therefore an additional operator would be able to provide high quality telecommunication services to the surrounding area in line with national guidance set out in the NPPF and The Code of Best Practice. This offers the best environmental solution, limiting the amount of new sites required whilst allowing two operators to utilise the same site and a single telecommunications network grid.

In preapplication advice from the Council, the Planning Services Manager, stated that there is an existing mast nearby and whilst he acknowledged that it cannot be used for legal reasons he felt it to be unsatisfactory to have two masts in reasonable proximity in this location. This existing site is owned by Airwave and while Vodafone are currently using the site there are no legal rights for Telefonica to utilise the same structure. The agents acting on behalf of the landlord cannot agree commercial terms with the operators that would reflect reasonable market rates. Inspectors' at appeal have found that commercial considerations are a valid factor in determining what is reasonable when erecting antennas on another structure (see para 7 PINS ref: APP/M4510/A/12/2169920 at Appendix CTL1).

Notwithstanding the above, the existing installation would have to be radically redesigned, made bulkier and bigger and as such would have greater impact on the visual amenity of the area compared to the proposed scheme. A second installation would therefore have less impact within the local environ. Consequently, the existing site has been discounted as the site is unavailable and in any case would have to be significantly redesigned to the detriment of visual amenity to the area.

Consequently. there are no existing suitable and available telecommunications installations for the operator to share. Similarly there are no buildings which are suitable and available that the operators could utilise to operate their equipment. The discounted options are set out in section 6 above. In line with Policy AB 29 of the Local Plan and Policy 38 of the emerging Local Plan the operator has minimised the potential impact on the visual amenity of the immediate surroundings and wider landscape by proposing to locate the required radio base station just north of the 6.3m railway bridge. This forms an appropriate backdrop to the installation and partly shields it from the wider areawhen viewing from the south and east. The

site is located in a largely commercial area, which also forms a suitable backdrop when viewing the site from the south and east and helps to screen the site when viewing from the west. It is some distance from residential properties to the east and south and away from the AONB to the north. Therefore the proposed installation would not appear dominant or out of place in this location. This is in line with paragraph 43 of the NPPF, Policy AB29 of the Local Plan and Policy 38 of the emerging Local Plan.

The existing Airwave base station to the north west of the site, at Shoreham Airport, is a monopole with exposed antennas to a top height of 21.5m. The proposed installation would have an overall top antenna height of 20m. The lattice tower would be erected on a 1m high concrete base due to the flood risk in the area. The site is nestled between a number of trees and bushes. The 6.3m railway bridge to the south forms an appropriate screen/backdrop to the installation.

A lattice tower design is proposed in this location as it is located away from residential properties, in a largely commercial area, away from designated areas. Antennas which are not shrouded offer greater flexibility for upgrading without the need for design changes. Shrouding the antennas within a monopole design makes the antennas less efficient at providing the necessary coverage and capacity to the surrounding area both now and in the future. Therefore, this would lead to further design upgrades being required and pressure for another radio base station within the same cell area which is likely to have a greater impact on the surrounding area and a greater proliferation of masts, contrary to local and national guidance.

The proposed top height of the antennas at 20m is the lowest operational height that can be achieved in this location in order to provide all the multi technologies to the surrounding area. If the antennas and lattice structure were to be any lower then the antennas would not be able to work effectively and therefore an additional installation would be required in the same cell area, which would lead to the proliferation of masts contrary to national guidance.

The social and economic benefits are a significant material consideration which should be weighed against the minimal visual impact associated with an installation at this location. HM Treasury outlined such benefits in its report '*Fixing the Foundations: Creating a More Prosperous Nation*' – July 2015. Paragraph 7.1 of the plan stated that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

Paragraph 7.2 goes on to highlight strong support for high quality communications infrastructure. It states

'*by reducing red tape and barriers to investment, the Government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The Government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published March, of near universal 4G and ultrafast broadband coverage.*'

Indeed, recently MPs have noted in parliament that the UKs Superfast Broadband connectivity was 'relatively poor' and businesses in rural areas, in particular, were losing out from patchy coverage.

As such, there is continuing and growing strong national support for high quality communications infrastructure. This is demonstrated in a commitment to review permitted development rights and as discussed by David Cameron in Prime Ministers questions as recently as early March this year, where he stated:

'*Our constituents now want coverage for the internet, they want coverage for mobile phones…we need to make sure we change the law in all the ways necessary to make sure…the masts are built, we increase coverage and we ensure everyone is connected to the information superhighway*'.

Therefore the Government fully supports high quality communications infrastructure. Indeed, NPPF states at paragraph 43 that local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. It acknowledges that high quality communications infrastructure is essential for sustainable economic growth. The NPPF also highlights that the development of high speed broadband technology also plays a vital role in enhancing the provision of local community facilities and services. The installation will improve the quality of life for Adur residents via new and improved local services and community infrastructure that such an installation will bring to the area.

Providing the latest high quality mobile telecommunications services in this area will assist the nearby Shoreham Airport as a key business centre and a popular visitor attraction, where the general public are becoming more reliant on their smartphone devices for everyday living and working. High speed broadband availability will assist in developing economic growth in this area in line with the aspirations of the emerging Local Plan, national guidance set out in the NPPF and the latest Government thinking.

The new installation will provide high quality 2G/3G and 4G mobile communications in an area where currently there is little to no coverage, supporting the Government's aim of '*focusing on ensuring that everyone is connected to the information superhighway*'. This fully meets the aspirations of NPPF. The new parallel site will ensure that the expansion of the electronic communications network is facilitated and that high quality communications infrastructure is provided to the immediate area. This is in full accordance with the operator's 4G license obligations, the NPPF and emerging policy 38 of the Local Plan. It will also address some of the key issues that will affect Adur up to 2031 including the need to diversify the economy, provide more opportunities for businesses to locate in to or expand in Adur, to improve Adur's infrastructure and the need to work towards achieving sustainability to help address climate change and efficient use of limited resources.

In line with national guidance set out in NPPF, the transmission dishes are small with a diameter of just 300mm, located underneath the antennas at a centre line height of 16.5m. This will ensure that from a technical point of view, the line of sight will be assured, allowing the site to be connected to the single grid network. If the transmission dishes were to be any smaller in size then they would not be able to work effectively. Similarly if they were any lower then they would not be able to obtain a clear line of sight. The transmission dishes prominence will also be minimised as their positioning will be out of the natural line of sight of the general public. This is especially true given the siting of the equipment on private land some distance from the public arena.

The site is located outside Shoreham-By-Sea in an established telecommunications area, some distance from residential properties, therefore the amenity of the occupants of the nearby properties will not be unduly affected.

The proposed equipment cabinets are small for telecommunications apparatus at a maximum height of 1.975m. Therefore, the existing vegetation and railway infrastructure in the immediate area will shield much of these cabinets from public vantage points. As such, there would be no detrimental impact on the character and appearance of the area by the installation of such equipment.

The NPPF strongly supports sustainable development, as does Policy 1 of the emerging Local Plan. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore comply with NPPF and the emerging Local Plan to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

Summary

The proposed installation will enable the operator to fill the current 4G coverage gap in and around Shoreham-By-Sea. This will support the operators 4G license obligations to provide coverage to 98% of the country. Thus providing a high quality service to its customers and access to the latest technologies whenever and wherever they are. An installation located outside this area would not allow the operator to fill the current coverage 'not spot'.

Installing a radio base station in this location, providing 2G/3G and 4G coverage will fully meet the national Governments aim of '*ensuring that everyone is connected to the information superhighway*' and the national policies set out in NPPF.

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

The social and economic benefits of providing reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. These benefits are strong material considerations which outweigh any minor loss of visual amenity to the surrounding area.

The significance of the proposal which will also allow two competing companies to operate and manage a single network grid using modern MORAN technologies across the UK is also a material consideration.

As such, there are strong material benefits for closing the gap in coverage in this part of Shoreham-By-Sea and the surrounding environs which fully accord with NPPF and the Governments latest aspirations that everyone should have access to the information superhighway.

Contact Details

Name: (Agent)	Jennie Hann	Telephone:	0161 785 4500
Operator:	Telefonica UK Limited	Fax no:	0161 785 4501
Address:	Clarke Telecom Limited, Madison Place, Northampton Road, Manchester, M40 5AG	Email Address:	Jennie.Hann@clarke-telecom.com
Signed:	[redacted]	Date:	16/9/2016
Position:	Planning Manager	Company: (on behalf of CTIL and above operator)	Clarke Telecom Limited

APPENDIX CTL1

APPEAL DECISION

PINS ref: APP/M4510/A/12/2169920

The Planning Inspectorate

Appeal Decision

Site visit made on 30 April 2012

by Graham Edward Snowdon BA BPhil Dip Mgmt MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 11 June 2012

Appeal Ref: APP/M4510/A/12/2169920
Grass verge adjacent to Greenway, Chapel Park, Newcastle upon Tyne NE5 1UY

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant approval required under a development order.
- The appeal is made by Vodafone Ltd against the decision of Newcastle City Council.
- The application Ref 2011/1226/01/NOT, dated 23 August 2011, was refused by notice dated 17 October 2011.
- The development proposed is a 11.8m high joint operator street furniture type telecommunications tower incorporating 6 no 3G antennas within a reduced GRP shroud (grey in colour), 1 no equipment cabinet (Vulcan type 1898 x 798 x 1648mm, RAL 6009 fir green) and all ancillary development (foundations, fixtures, fittings, cabling etc).

Decision

1. I allow the appeal and grant approval under the provisions of Part 24 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 1995 (as amended), in respect of development by a telecommunications code system operator for the siting and appearance of a 11.8m high joint operator street furniture type telecommunications tower incorporating 6 no 3G antennas within a reduced GRP shroud (grey in colour), 1 no equipment cabinet (Vulcan type 1898 x 798 x 1648mm, RAL 6009 fir green) and all ancillary development (foundations, fixtures, fittings, cabling etc) at land at Grass verge adjacent to Greenway, Chapel Park, Newcastle upon Tyne NE5 1UY in accordance with the terms of the application Ref 2011/1226/01/NOT, dated 23 August 2011, subject to the following conditions:

   (1) The development hereby permitted shall begin not later than three years from the date of this decision.

   (2) The development hereby permitted shall be carried out in accordance with the following approved plans: Drawing nos 100 Issue C, 200 Issue G, 300 Issue D, 400 Issue F and 500 Issue B.

Preliminary Matter

2. Although the application form and appeal form gives the locational address as "Walbottle", the appeal site lies within "Chapel Park" and I have used this address above, as given by the Council in its decision notice.

Main Issues

3. The Council is satisfied that there is a need for the development, which is the subject of this appeal. It is further satisfied that a statement has been submitted, which self certifies that the effect of the installation, when operational, will not exceed the guidelines for public exposure of the International Commission on Non-ionising Radiation Protection (ICNIRP). From the evidence before me, I am also satisfied on these points. I, therefore, consider that the main issue is whether the appellants have provided evidence that they have satisfactorily explored the possibility of erecting the antennas on an existing building, mast or other structure (including nearby pylons) in order to satisfy the requirements of national and local policy relating to telecommunications development.

Reasons

4. The proposed 11.8 metre high street pole housing 6 no antennas in a GRP shroud, together with associated equipment cabinets would be located within the grass verge on the south side of Greenway, which is the principal distributor road through a residential estate. The location of the appeal proposal is separated from an area of community greenspace by the footway along the south side, flanked by rows of trees. The rear elevations of residential properties on Kenmoor Way, Killin Close and streets to the north of Greenway face onto this space. Greenway is flanked by 10.5 metre high street lamps and the proposed pole would be located some 11 metres from one of these. When approached from the east along the Greenway, the proposed structure would be seen in conjunction with this street light column against the silhouette of a large electricity pylon in the background. From other directions it would be seen against a backdrop of trees and, whilst it would protrude above these and the nearby lighting columns, I do not consider that it would look out of place. Other than a comment about the colour of the pole, the Council has submitted no evidence or argument to suggest that the proposal would be visually detrimental to the character or appearance of the area.

5. It is against that background that I have considered the alleged failure of the appellant company to properly investigate alternative sites.

6. Policy ED6, saved from the Council's Unitary Development Plan (UDP) states that telecommunications development will be granted where, among other things, there are no satisfactory alternative sites and no reasonable possibility of erecting antennas on an existing building or other structure. This broadly reflects government advice, now found in the National Planning Policy Framework (NPPF), which states that applications for telecommunications development should be accompanied, in the case of a new mast, by evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure. It appears to be agreed between the principal parties that the only potential site within the appropriate designated area of search that meets the locational and operational criteria of the appellant company is one of the nearby electricity pylons.

7. The appellant company claims that it has been negotiating with the owners of these pylons for a period of over 2 years and cannot agree commercial terms that would reflect reasonable market rates. E-mail correspondence confirming

this is referred to. This is not before me, but the City Council appears to have been provided with this information in the context of a previous application for the site and does not dispute the fact that it is a failure to agree commercial terms, which has led the appellant company to dismiss the possibility as a realistic alternative. The Council argues that failure to agree commercial terms represents insufficient justification for dismissing the alternative and does not rule this out as a solution. I consider this to be somewhat unreasonable. The appellant company has also indicated that, as the land beneath the pylons is owned by the City Council, permission would be unlikely to be forthcoming. Whilst no corroborative evidence to this effect is submitted, neither has the Council offered any evidence to dispute the claim. UDP Policy ED6 requires the appellant to demonstrate that there is no "reasonable" possibility of erecting antennas on another structure. I consider that commercial considerations are a valid factor in determining what is "reasonable" and I am satisfied, from the information before me that the appellant company has satisfied the requirements of both UDP Policy ED6 and the NPPF in this respect.

8. Given that, and the lack of objection on visual grounds to the proposed location, I conclude, on the main issue, that the appellant has satisfactorily explored the possibility of erecting the antennas on an existing building, mast or other structure (including nearby pylons) in order to satisfy the requirements of national and local policy relating to telecommunications development.

Other considerations

9. The views of local residents have been fully taken into account in reaching the conclusions on the three main issues set out above. I am conscious of the level of local opposition to the proposal and this cannot be minimised. However, the objections have to be considered in the light of the local and national policy framework set out. As I have indicated above, I am – in common with the Council – satisfied of the need for the development, given the identified shortage of 3G capacity and coverage in the area and I am conscious of government policy in the NPPF that the expansion of electronic communications networks should be encouraged. Whilst recognising fears relating to local property values, it is not the function of the planning system to protect what are essentially private interests and this is a matter to which I can attach very little weight.

10. I have also had regard to the various health and safety concerns expressed by local residents and accept that their fears are relevant to my decision. However, government guidance in the NPPF advises that if a proposed mobile phone base station meets the ICNIRP guidelines for public exposure to radio waves, local planning authorities should not determine health safeguards. On balance, and bearing in mind that little objective evidence has been submitted to support local fears and that the emissions from the mast would be well within the ICNIRP guidelines, I do not consider that local health concerns are sufficient to justify refusing planning permission.

11. I have also had regard to local concerns that the proposal would give rise to highway safety issues. However, I note that the Council's highway department has offered no objection to the scheme and the only tangible objection offered is that the installation may lead to service vehicles parking on the roadside on

the inside of a bend. I consider that forward visibility on Greenway would not be compromised on the few occasions when the installation might give rise to such parking and that this is not a sustainable objection to the proposal.

12. None of these other considerations would, therefore, provide justification for the refusal of planning permission.

Conditions

13. The Council has not suggested any conditions in the event of the appeal being allowed, though has suggested that there should be a requirement for the pole to be painted to match the existing street lighting columns in the area. I do not consider the dull grey galvanised colour proposed to be out of place and consider that a condition requiring a different colour is unnecessary. However, in addition to the standard condition relating to commencement of the development, I consider that a condition requiring the development to be carried out in accordance with the approved plans is necessary for the avoidance of doubt and in the interests of proper planning. I shall impose a condition accordingly.

Conclusions

14. For all the above reasons, and having regard to all other matters raised, I conclude that the appeal should be allowed.

G E Snowdon

INSPECTOR