SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	NORTH KINGSTON BY SEA	Site Address:	SW Junction of Eastern Ave / Upper Shoreham Road, Shoreham By Sea, West Sussex, BN43 6PF.
NGR:	E: 522295 N: 105922		
Site Ref Number:	CTIL_149941_TEF_072206	Site Type:[1]	Macro

ADUR & WORTHING
PLANNING SERVICES

PLAN	AWDM/ 1110/14
DATE VALID	- 7 AUG 2014

2. Pre Application Check List

Site Selection (for New Sites only)

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

Annual Area Wide information to local planning authority

Date of information submission to local planning authority	7 October 2013
Name of Contact	Steven Collins and Gary Peck
Summary of any issues raised:	Strategic level pre-rollout meetings are held with the LPA to discuss the necessities of the project, benefits and best practice going forward.

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	08.07.2014	
Was there pre-application contact:		No
Date of pre-application contact:	N/A	
Name of contact:	N/A	

[1] Macro or Micro

Summary of outcome/Main issues raised: No specific comments to date.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	~~Red~~	Amber	~~Green~~
Outline Consultation carried out: Consultation with local Ward Councillors for St Mary's District Ward (Cllrs R Hotton and M Mendoza) in addition to MP Mr Tim Loughton. Pre-application consultation letters and drawings of the proposals were sent to these parties on the 08.07.2014.			
Summary of outcome/Main issues raised: No specific comments received to date.			

School/College

Location of site in relation to school/college: Buckingham Playgroup, Scout Hall, Eastern Avenue, Shoreham-By-Sea, West Sussex, BN43 6PE Kingston Buci First School, Middle Road, Shoreham-By-Sea, West Sussex, BN43 6GA.
Outline of consultation carried out with school/college: Pre-application consultation letters and drawings of the proposals were sent to Chairs of Governors and Head teachers of the above schools on the 08.07.2014.
Summary of outcome/Main issues raised: N/A.

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		N/A
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	

Date served:	04.08.2014

3. Proposed Development

The proposed site:

Background

The main instigator for a requirement for a new telecommunications site in this local area is due to a forced relocation due to a notice to vacate the existing rooftop cell site at Southlands Hospital on Upper Shoreham Road (Telefonica site reference 20877). We understand that this is due to redevelopment of the existing site. This application is one of two replacement sites that will be required in order to replicate the required coverage that is currently seen on the existing site.

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"). Due to the dramatic rise in the use of mobile data, the industry has had to consider new operating models that are efficient at delivering 3G and 4G services to a much larger percentage of the UK population, as well as supporting 2G services. Both companies pledge to close the digital divide between rural and urban areas targeting 98% indoor population coverage across 2G and 3G by 2015. The agreement will also lay the foundations for two competing 4G networks to deliver the capability for a nationwide 4G service faster than could be achieved independently.

The agreement allows both organisations to pool their basic network infrastructure, while running two, independent, nationwide networks allowing consumer choice. By doing this, they will both reach far more of the country far faster than they could achieve on their own. This single network grid will automatically increase each operator's footprint by 40%, adding competition and choice for customers in areas that previously only had one operator's coverage available.

Following agreement with the two operators, some ownership of the equipment will change to allow the commissioning of the proposed Multi-Operator Radio Access Network ("MORAN") required to deliver the single network grid. This will have little impact from a planning standpoint, however, it forms an important part of the agreement between the companies. It will also provide enhanced capacity for both operators' customers in the future, which will be especially important with the recent launch of the 4G networks. Therefore from a customer perspective they won't see any change as customers will continue to use each operator's network. This agreement is about consolidating infrastructure assets, clearing the way for innovation and the creation of new services that customers really want.

CTIL and Telefónica UK Limited are looking to progress works which will entail the installation of a new streetworks radio base station site on the grassed verge at the junction of Eastern Avenue / Upper Shoreham Road, Shoreham By Sea. The purpose of the proposal is to enable a single network grid supporting modern MORAN technology for both Telefónica UK Limited and Vodafone Limited. The site will be operated by CTIL and Telefónica UK Limited but the proposed installation will enable shared operators to provide potential future MORAN services from the site on the grassed verge on the northern side of Upper Shoreham Road, Shoreham

By Sea, West Sussex, BN43 6PF.

The site is located on the grassed verge opposite the junction with Eastern Avenue and to the west of Parkside in close proximity to the existing tarmac footpath. To the north of the site is a bank of mature trees of up to approximately 11m in height with playing fields further to the north. To the south of the site on the other side of Upper Shoreham Road is a medical centre with further commercial development on the site of the Green Jackets public house and car parking facility.

The proposed site benefits from the shielding effects provided by a backdrop of mature trees to the north of the site of up to approximately 11m in height, with the tree coverage extending along the eastern side of Parkside. There is further scattered tree coverage of similar height on both sides of Upper Shoreham Road serving to mask views of the site from a number of angles.

The proposed radio base station comprises a 15m high Elara Pole finished in green supporting 3no. antennas within a shroud at the top of the column. The proposal also includes the installation of 2no. Lancaster equipment cabinets and a meter cabinet at ground level approximately in close proximity to the base of the column.

The proposed 15m tower has similar vertical lines to the numerous street lighting columns and telegraph poles distributed around the vicinity of the site allowing the proposal to merge with its surroundings.

Telefónica UK Limited have specified a 15m column as this is the minimum height that can provide the required coverage with the potential for future shared usage within one facility.

Enclose map showing the cell centre and adjoining cells:

This can be supplied to the LPA on request.

Type of Structure: 15m Elara Streetworks Pole

2013 CTIL

Description:

The proposed development relates to the installation of a radio base station consisting of a 15m high Elara Pole finished in green supporting 3no. antennas within a shroud at the top of the column.

The latest proposal accommodates the operator antennas at a top height of 14.90m and an underside height of 12.90m. The antennas within the new structure will be concealed within a cylindrical shroud at the top of the column.

The development at this location also includes the installation of 2no. equipment cabinets the dimensions of which are 1898mm x 798mm x 1645mm which equates to 2.49m^3 each alongside 1no. slim line meter cabinet (655 x 260 x 1015 (0.173m^3)). They will be located in close proximity to the base of the proposed telecommunication column. All elements of the proposals can be painted to the Local Planning Authority's requirements although a green (RAL 6009) finish is suggested to match the existing BT cabinets already in situ. A green (RAL 6009) finish is also proposed for the column.

Overall Height: Elara	15 Metres
Height of existing building :	N/A
Equipment Housing: Alifabs Lancaster	
Length:	See drawings
Width:	See drawings
Height:	See drawings

Materials:	
Tower/mast etc – type of material and external colour:	Elara – Green
Equipment housing – external colour:	Green

Reasons for choice of design:

Whilst the proposed column will provide new 3G Telefónica coverage to the immediate area the site is also needed to allow the potential for two companies to operate and manage a single network grid across the UK, using MORAN technology. As well as allowing each operator to increase their overall footprint by 40% nationally, it will also enable future 4G in to the network.

The use of MORAN technology will allow the operators to increase their national footprint and enable future 4G technology. To achieve this, a new column is necessary which will allow the required MORAN technology solution within a single streetworks pole. Therefore the applicant's proposals involve the installation of a new 15m Hutchinson Elara streetworks pole, which can accommodate all technologies within the same column. It is highlighted that in specifying a telecommunications installation that has the potential to support site sharing technology this would ultimately reduce the need to introduce a new installation in to this cell area. This will avoid the need for added proliferation of new masts within the surrounding area whilst allowing the expansion and improvement of the electronic communications networks, including telecommunications and high speed broadband.

It should be recognised that the use of shrouded antennas as proposed would eliminate the large number of bracing components associated with other more prominent and conventional telecommunications installations. The applicant has opted to connect the site into the national network via an underground link rather than rely on a transmission dish, which Telefonica judged might affect the linear nature of the design and increase its prominence in the streetscene.

The proposal also includes the erection of 2no. new equipment cabinets and 1no. slim line meter cabinet which will be located in close proximity to the base of the column in an area already accommodating a number of other similar cabinets. The equipment cabinets will house the operators' MORAN technology equipment and are ancillary to the functionality of the proposed slim-line column and its antennas, thus the ground based development is a justified item of street furniture. The equipment cabinets will have an appearance similar to the code system operators' and electrical service boxes found in a streetscene. It is considered that the ground based development will not have a detrimental impact on the visual amenity of the area and through appropriate painting will assist in blending effectively with its surroundings.

It is appreciated that the site will be visible to pedestrians and road users. However, it is considered that the siting of the proposed slim-line column in a position benefitting from the shielding effects provided by a number of surrounding trees in an area where there are several linear urban items of street furniture will ensure that the column will not be seen as detrimental to the visual amenity of the area and character of the streetscene.

It is considered that road users will not have their visibility impaired by the proposed installation owing to the base stations positioning set back from the highway in alignment with other street furniture along the highway. The cabinets and pole have been sited on a section of grassed verge whereby their presence will not impair the visibility or safety of motorists or pedestrians.

The technical requirements of mobile communication operators such as the applicant are acknowledged in the National Planning Policy Framework, which states that local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband.

In address of the appearance of the proposal, it is believed that the scheme takes a form which is sympathetic within the context of its immediate street scene which includes existing lighting columns and telegraph poles with similar vertical lines distributed around the vicinity of the site. Aware that some standard mast designs can appear incongruous, it is highlighted that the antennas would be concealed within a cylindrical shroud and would be integral to the upper most section of the pole. The column is relatively slender, similar to the existing lighting columns in the locality and will blend in with the linear urban items of street furniture which can be found in the immediate area.

Placing masts near similar structures and utilising simple and unfussy designs is acknowledged in the 'Code of Best Practice on Mobile Network Development in England' to be less likely to dominate and be in discord with the landscape and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area. This design is considered to be an appropriate solution and shows the applicants efforts to help mitigate the proposals impact on the visual amenity as outlined within NPPF.

In light of the operators' efforts to design the best solution for this particular site so as to minimise the impact of the development on the environment, it is considered that the appearance of the replacement column would not seriously impact on the visual amenity of the

area, nor would it form an obtrusive feature within the streetscape.

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 deliver the capability for a MORAN service for two competing operators from a single network installation, would not appear out of place within the street scene.

4. Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached 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	

Frequency:	2G 900MHz and 1800MHz, 3G 900Mhz and 2100Mhz and 4G 800Mhz and 2600MHz
Modulation characteristics[2]	2G (900 or 1800) – GMSK 3G (900 or 2100) –

[2] The modulation method employed in 2G (GSM) is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase modulation
The modulation method employed in 3G (UMTS) is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation
The modulation method employed in 4G (LTE) is 64 QAM (Quadrature Amplitude Modulation) which is another form of Phase Modulation

2013 CTIL

	QPSK 4G (800 or 2600) - QAM
Power output (expressed in EIRP in dBW per carrier)	800 MHz 31dBW 900 MHz 32 dBW 1800 MHz 32 dBW 2100 MHz 35 dBW 2600 MHz 31 dBW
In order to minimise interference within its own network and with other radio networks, Vodafone Ltd and 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 Vodafone Ltd and 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

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. The distances between transmitter sites will depend on many factors, including the geography of the mobile services. There is a specific requirement for a new radio base station at this location to allow the two companies to operate and manage a single network grid across the

UK using MORAN technology, including the opportunity for future 4G service.

This single network grid will automatically increase each operator's footprint by 40%, adding competition and choice for customers in areas that previously only had one operator's coverage available and is a principal reason for the proposed installation.

Additionally, laying the foundations for a 4G system that provides mobile ultra broadband internet access, e.g. to laptops with USB wireless modems, to smartphones and to other mobile devices, is desirable. 4G provides superfast mobile broadband and will provide better, faster and more reliable mobile broadband connection according to Ofcom's Chief Executive. OfComs Chief Executive also acknowledges that down load speeds will initially be at least 5 to 7 times faster than existing 3G networks.

The National Planning Policy Framework states at paragraph 46 that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt, the proposed installation is needed for the company, via CTIL to operate and manage a single network grid across the UK using MORAN technology.

The Government has expressed its commitment to the UK having the best superfast broadband network (i.e. those services with a headline speed of 30Mbit/s or more) by 2015. It also wants superfast broadband networks to be available to 90% of homes and businesses.

According to OfComs Communication Marketing Report 2013 it found that the proportion of homes which accesses the internet or web-based services over a mobile network increased by 8% in the last year to 50% mainly due to the increasing smartphone take-up (i.e. phones which are specifically designed for the consumption of internet-enabled services such as websites and mobile applications). At the same time the use of email, social networking sites and instant messaging services all increased. Ofcom estimates that the number of subscribers who accessed the internet from mobile phones increased by nearly 9 million in 2012.

In the first quarter of 2013, 49% of UK adults accessed the internet using a mobile phone, a 10% increase on last year. Three quarters of those aged 16-34 said they accessed the internet using a mobile. The report found that people in the UK spent an average of over one day a month using the internet over a mobile network or a fixed internet connection PC in 2012. During 2012, the average time spent using a mobile data connection increased by 8 minutes a day (6%). The report also found that an average household spend on mobile services increased by 3.4% largely as a result of the growing use of mobile data services (i.e. smartphones).

The growth in smartphone take-up has resulted in increasing use of mobile data services. The percentage of mobile users who used their handset to access emails, download applications and send and receive instant messages has at least doubled over the last two years to 36%, 29% and 26% respectively in the first quarter of 2013. It has become so popular that the number of voice calls has been overtaken by such mediums as email, texting and social networking sites. Indeed, 47% of all mobile users accessed their mobile in the first quarter of 2013, up from 28% in 2011.

Ofcom Research 2013 reported that 66% of mobile data users who access the internet do so equally inside and outside the home. The location of most mobile broadband use outside the home is when travelling (25%), at someone else's house (22%) and indoor public spaces (18%).

According to Ofcom research conducted in April 2013, 30% of smartphone users intend to upgrade to 4G at the end of their current contract. The most commonly cited reason for wanting a 4G service is speed. 73% of smartphone owners said they wanted a 4G service for quicker download speeds and 59% said they wanted 4G to enable faster streaming. The second most commonly cited reason for a 4G service was the reliability of the data service to take advantage of 'improved data coverage' and a 'more reliable data connection'.

The Ofcom Report found that it is likely that faster mobile data networks will contribute to further increases in average data consumption and 44% of smartphone users questioned by Ofcom in April 2013 said they would use their handset more if their mobile data connection was faster. The Report stated that data collected by BillMonitor, a company that aims to help subscribers to analyse their mobile bills and find suitable tariffs, showed that consumers' use of mobile data increased at an annual rate of 70%.

As such, the need for indoor 3G coverage is becoming ever more necessary and significant and the new 4G networks will become increasingly relevant in the coming months as the network is rolled out across the country.

The area within which an installation needs to be established in order to meet the coverage requirement is constrained by the location and extent of the coverage provided by existing installations in the surrounding area. The proposed scheme utilises a new radio base station installation which will be required to provide a single grid network using MORAN technology. This will enable the operators to meet their efficiency, capacity and ever increasing technical capability requirements within a single grid network.

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the local authority in understanding any technical constraints on the location of the proposed development.

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

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.

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution. New sites are only developed where there are no viable or accessible alternatives or it is the local planning authority's preferred approach. The feasibility of the acquisition, build and maintenance of the site also needs to be taken into account.

In accordance with the above sequential approach, and in line with the principles of pooling the operators existing network infrastructure to create a single network grid, the proposal is to install a new base station in this location.

Site	Site Name and address	NGR	Reason for not choosing
Buckingham Park	Buckingham Park, Old Shoreham Road, West Sussex, BN43 6HA	E522256 N106208	Site is owned by Adur DC who have an anti telecom policy
St Giles Church	St Giles Church, Old Shoreham Road, West Sussex, BN43 6AZ	E522523 N105995	Site is a 2 story church adjacent to residential property. There is a lack of space for equipment also.
Tesco Express	Tesco Express, 225 Old Shoreham Road, West Sussex, BN43 6BE	E522328 N105877	Building is owned by Tesco who have an anti telecom policy

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

N/A.

Additional relevant information:

Siting:

The site is located in a well shielded position against a backdrop of mature trees and adjacent to playing fields and opposite a commercial hub. The proposed installation has similar vertical lines to the numerous street lighting columns distributed around the vicinity of the site. The proposal has therefore been carefully sited in a well shielded position overlooked by a medical centre and large convenience store so as to provide the required improved coverage to the area whilst minimising visual intrusion for residential properties.

The cabinets and column have been sited on the tarmac footpath set back from the highway, whereby their presence will not impair the visibility or safety of passing motorists or pedestrians.

The proposals will be located on a small section of grassed verge hence there will be no compound enclosure and the development will be accessible within the public realm. Nevertheless, the proposed ground based equipment cabinet has an appearance similar to other communications and electrical service boxes found in typical streetscenes in which similar operations can be likened. It is likely that once built, the site will be visited infrequently for maintenance purposes only, as is currently the case. Access to the site will be by foot in which the applicant would gain access to the equipment housed within the cabinets. In the event of the antennas within the mast needing to be maintained this will be achieved by siting a cherry picker with a hydraulic platform alongside the base station.

Visual appearance:

The operator recognises the need to minimise the visual impact of any new structure on the site. The slim-line column is therefore been specified with the thinnest possible diameter in order to house MORAN technology within the same structure, thus allowing the potential for shared operators to utilise the same apparatus. If the shroud and column were any slimmer or the column height were any lower, the multiple MORAN technologies would not be able to fit within the same structure and an additional column would be required, which would lead to the proliferation of masts, contrary to national and local planning policy.

The replacement column of 15m is required in order to accommodate the operator antennas and feeders within the same structure at a height which continues to allow clearance of surrounding natural and built features such as the surrounding buildings and mature trees. This will allow the required improvements to network coverage to be provided. As the column is a similar type of column to the one it replaces, the impact on visual amenity within the streetscene will not be detrimental.

The proposed cabinet can be painted in an appropriate colour in order to help it merge with its surroundings, although green is proposed to match the existing BT equipment cabinets already in situ.

In light of the operator's efforts to design the best solution for this particular site so as to minimise the impact of development on the environment, it is considered that the appearance of the proposed column would not seriously impact upon the visual amenity of the area, nor would it form an obtrusive feature within the streetscene.

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*'.

The proposed development accords with all these aspects of the NPPF in that it will provide Telefonica UK Ltd and Vodafone Ltd with improved network provision within the BN43 area of Shoreham By Sea bringing a range of associated economic and technical benefits.

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.

Paragraph 45 of the NPPF defines the evidence that should be supplied to justify the proposed development. This should include:

- *"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 or technical site; and*
- *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 on non-ionising radiation protection guidelines; or*
- *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 accordance with Paragraph 45 of the NPPF this application has been submitted with the relevant supporting documentation.

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*'.

In accordance with Paragraph 46 this application has been submitted with the requisite ICNIRP certificate.

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. For decision-taking this means:

- Approving development proposals that accord with the development plan without delay; and
- Where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission unless:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- Specific policies in this Framework indicate development should be restricted.

Section 7 of the NPPF sets out the requirement for good design and states at paragraph 56 that '*the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people*'. Paragraph 65 goes on to state that '*local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design*'.

The NPPF sets out 12 core principles which should underpin plan-making and decision-making these principles include that every effort should be made objectively to identify and meet development needs of an area, and respond positively to wider opportunities for growth (para 17).

Annex 1 of the NPPF sets out the implementation of the NPPF and advises in paragraph 214 that for 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 [in development plan documents adopted in accordance with the Planning and Compulsory Purchase Act 2004]. Paragraph 215 goes on to state that in other cases and following this 12-month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with this Framework (the closer to the policies in the plan to the policies in the Framework, the greater the weight that may be given).

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. It supersedes the Code of Best Practice on Mobile Phone Network Development (2002).

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. The Code acknowledges that sharing of sites is now the norm, and network operators now share much of their network infrastructure via joint venture commercial arrangements.

In order to minimise visual intrusion for residential properties within the locale, the applicant has designed a relatively slender mast rather than the use of a more traditional monopole column which would be considered incongruous and it is likely that such a proposal would have an unacceptable visual impact in this residential area. It is therefore considered that the use of a 15m high, slim-line pole would eliminate the large number of bracing components associated with other more prominent installation designs such as 'traditional' lattice/monopole structures.

The Code provides guidance on siting and design at Appendix B and continues to acknowledge that camouflaging or disguising equipment is considered materially appropriate with more modern masts frequently able to blend into their surroundings far more effectively than some of the older masts. In reducing the environmental and visual impact of the installation the Code of Best Practice promotes the use of simple and uncomplicated designs. *"Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts."* In this regard, the proposed slim-line column with hidden antennas will ensure that the environmental and visual impact of the equipment remains low as the column itself will appear similar to other vertical structures within the immediate area minimising the environmental and visual impact of the equipment.

Concerning the erection of new ground based masts; The Code provides examples of where the environmental and visual impact of the mast can be greatly reduced.

- *Placing the mast near similar structures. For example, industrial and commercial premises, road signs and lamp posts;*
- *Using simple and unfussy designs. Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts; and*
- *Appropriate colouring.*

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 Comprises the saved policies of the Adur District Local Plan 1996 and the saved policies of the West Sussex Minerals Plan. Saved Policy AB29 (Telecommunications Development) is of most relevance for the proposal:

Policy AB29 Telecommunications Development

The District Planning Authority will grant planning permission for, or approve the details of, 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.

When considering proposals for telecommunications development, whether or not under permitted development rights, the District Planning Authority, whilst respecting operational requirements, will expect the apparatus to be sited, designed, and, where appropriate, landscaped, so as to minimise its visual impact on the environment in which it is located. Such masts will not be permitted where they would be visible in the wider landscape within the Area of Outstanding Natural Beauty except where special siting needs to attributable to technical requirements, such as transmission range or line-of-sight, dictate otherwise.

Planning Assessment

In accordance with Policy AB29's requirement for a new development to minimise the 'visual impact on the environment in which it is located', the proposed installation has been carefully sited in a heavily shielded location against a backdrop of mature planting and in a position overlooked by commercial development. The slim-line monopole design has been specified in order to minimise visual intrusion and to allow the proposed facility to merge with the numerous street lighting columns with similar vertical lines distributed around the vicinity of the site.

In accordance with policy AB29 requirements (ii) and (iii) above a detailed analysis of alternative sites has been provided in section 6 of this document, none of which were deemed to be suitable for technical, commercial or operational reasons.

The proposed installation fully complies with the objectives of the NPPF. 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].

The purpose of the proposed installation is to provide new coverage in the BN43 area of West Sussex whilst also enabling the potential for two companies to operate and manage a single network grid across the UK, using modern MORAN technology. Although this site is for Telefonica only the proposed installation will fit into the wider 02 / VF site sharing network and thus this facility adheres to the site sharing policies of the LPA and the NPPF. It will also provide the opportunity to improve the 3G capacity and coverage in the vicinity as demands on the network continue to be high with the increasing usage of smartphones and tablet computers, which is acknowledged in The Code of Best Practice.

The Government fully supports high quality communications infrastructure. 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 design chosen is one of the most sensitive designs available to the operators' that will allow two telecommunication operators' to utilise the same single site and enable the latest multiple technologies to be provided to the cell area. There are also several other linear structures within the immediate area with similar vertical lines including existing lighting columns on both sides of the surrounding highways.

The proposed installation will meet the aspirations of NPPF which encourages the use of sympathetic design and camouflage to minimise the impact of the development on the environment. The Code of Best Practice also acknowledges that the visual impact of the mast can be greatly reduced if it is placed near similar structures such as road signs, lamp posts and commercial premises. The site is located close to a number of existing lighting columns and other linear structures including traffic lights. Therefore the installation should merge into the existing streetscene and not be viewed as an alien feature within its setting. As a result, the proposed design fully accords with the Code of Best Practice and the NPPF.

It is acknowledged that there are residential properties in relatively close proximity to the site. However, given that the replacement pole has been sited in a well shielded position, adjacent to playing fields and opposite a commercial hub and will be of a similar appearance to the existing street furniture, the proposed installation will not cause a loss of residential amenity.

The equipment cabinets have a similar appearance to the existing equipment cabinets utilised by many other statutory undertakers such as BT Openreach, electricity suppliers and highways which are common in all urban areas. The dimensions are similar and can be found in similar locations up and down the country. As such, there would be no detrimental impact on the character and appearance of the area by the installation of such equipment. The equipment cabinets are ancillary to the functionality of the proposed column and therefore the ground based development is a justified item of street furniture. Furthermore, the dimensions of the equipment cabinet are less than 2.5m^3 and can therefore be installed under the operators permitted development rights however, details have been included on the plans for

transparency.

The NPPF strongly supports sustainable development. 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 to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

A study published in September 2012, by mortgage provider ING DIRECT reveals the non-essential aspects of a property that encourage buyers to sign on the dotted line include strong mobile 3G signal. 20% of the people surveyed said that strong 3G signal is desirable. As connectivity is essential to modern day living, buyers rate consistent 3G access in every room as the bare minimum. Therefore as the 4G network is rolled out across the country, demand for the superfast highspeed data capture will increase significantly and as part of the operators license agreement to provide a quality service to their customers they are obliged to upgrade their systems to ensure that their customers have access to the latest technologies. It is also in line with the Governments aspirations for the UK to have the best superfast broadband and which fully supports the expansion of electronic communications networks, including telecommunications networks, including telecommunications and high speed broadband.

Health and Safety

The proposed installation conforms to current government planning guidelines regarding potential health effects arising from telecommunications development. The operator has attached a declaration that the site conforms to ICNIRP guidance. This is in full accordance with NPPF.

Recent court cases have confirmed that the *public perception* of health risks can be a material consideration within the land-use planning system. The weight to be attached to this issue has to be determined accordingly in each case by the decision maker. It has been generally held, and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been demonstrated that the proposed installation will comply with the ICNIRP guidelines.

The publication of the National Planning Policy Framework continues to highlight the Governments view that the planning system is not the appropriate mechanism for determining health safeguards. It sends a clear message to local planning authorities stating that they 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*'. This is reiterated in the Code of Best Practice.

In this instance, Telefónica believes that it is not necessary to consider health effects further, as recommended by NPPF. The operator is committed to ensuring that all new and existing installations are ICNIRP compliant, and consequently it is considered that there is no basis for this application to be refused on health and safety grounds or for reasons relating to public

concerns about health and safety. ICNIRP compliance certificates are enclosed for the operator with this application. If required, additional information regarding the operation of mobile telephone base stations and health and safety considerations can be provided.

The replacement installation will continue to enable the operator to provide 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 provide their desired level of multi technologies coverage and capacity.

Summary

To summarise the case in favour of the proposals the following points are of relevance:

- With specific regard to telecommunications development, the proposal accords fully with the national guidance contained within the NPPF and the Code of Best Practice;
- 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 significance of the proposal in the development of two competing companies to operate and manage a single network grid using modern MORAN technologies across the UK is a material consideration. By pooling the operators' basic network infrastructure, this will:
  - Automatically increase each operator's footprint by 40%, adding competition and choice for customers in areas that previously only had one operator's coverage available.
  - Close the digital divide between rural and urban areas targeting 98% indoor population coverage across 2G and 3G by 2015.
  - Lay the foundations for two competing 4G networks to deliver the capability for a nationwide 4G service faster than could be achieved independently.
- With the advent of smartphones and tablet computers the demand for indoor 3G coverage and high speed data capture is increasing rapidly and the operators are obliged to meet this demand and provide a high quality service in line with the NPPF guidance.
- The operators' site selection strategy is to keep the overall environmental impact to a minimum through utilising the same sites wherever possible. The operators are utilising the same site where it is technically and legally possible and is the sequentially preferable environmental solution;
- The proposals would not constitute a proliferation of telecommunications installations as advocated by NPPF;
- The proposed installation is required to provide improved coverage in BN43 area of West Sussex whilst providing the potential to support multiple MORAN technologies thereby allowing shared operators to utilise a single site. The proposed alterations have been kept to the absolute operational minimum to clear the immediate buildings/clutter/trees and provide adequate service coverage and capacity for the operators to the immediate area.

Contact Details

Name: (Agent)	Jennie Hann	Telephone:	[redacted]
Operator:	Vodafone / Telefonica UK Limited	Fax no:	

Address:	Partington House, Stock Lane, Chadderton, Oldham, OL9 9EY	Email Address:	[redacted]
Signed:	[redacted]	Date:	06.08.2014
Position:	Planning Manager	Company:	Clarke Telecom Ltd (on behalf of CTIL and above operator)