

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Hylton Redhouse	Site Address:	Hylton Redhouse Reuben Page Bookmaker (Coral) 10 Ethel Terrace Castletown Sunderland Tyne & Wear SR5 5NQ
National Grid Reference:	E: 435969, N: 558136		
Site Ref Number:	CTIL 114196, TEF 34864, VF N/A	Site Type: ¹	Upgrade – Roof top site to monopole

2. Pre Application Check List

Site Selection (for New Sites only)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority		No
If no explain why: The site is an upgrade		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	16th December 2020
Name of contact:	The Director of Planning
Summary of outcome/Main issues raised: Prior to the submission of this application the applicant initiated pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues. Strategic level pre-rollout meetings are held with the LPA to discuss the necessities of the project, benefits and best practice going forward.	

¹ Macro or Micro

Community Consultation

Rating of Site under Traffic Light Model:		Amber	
Outline of consultation carried out:			
<p>Prior to the submission of this application the applicant initiate pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues.</p> <p>No comments were received in respect to the consultation submitted at the time of submission.</p> <p>Further consultation with the local Ward Councillors for Castle Ward (Councillor Stephen Foster, Councillor Doris MacKnight, Councillor Denny Wilson) and haron Hodgson MP.</p>			
Summary of outcome/main issues raised:			
<p>No responses had been received from any of the Ward Councillors at the time of submission.</p>			

School/College

Location of site in relation to school/college: There are no schools in close proximity as defined by the search criteria within the CoBP.	
Outline of consultation carried out with school/college: N/A	
Summary of outcome/main issues: 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?		No
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed	Yes	
Date served:	19 th January 2021	

3. Proposed Development

The proposed site:

This is a relatively unique upgrade as the proposal is to come off the exiting Coral roof top and then for a Street Works (SW) monopole to go adjacent. This is an upgrade of the cell but not in exactly the same location. The proposed site is illustrated below in Figure 1.

Figure 1:



Figure 2 and 3 below illustrate the existing site that is being upgraded by coming of the existing roof top and the proposed new location

Figure 2:



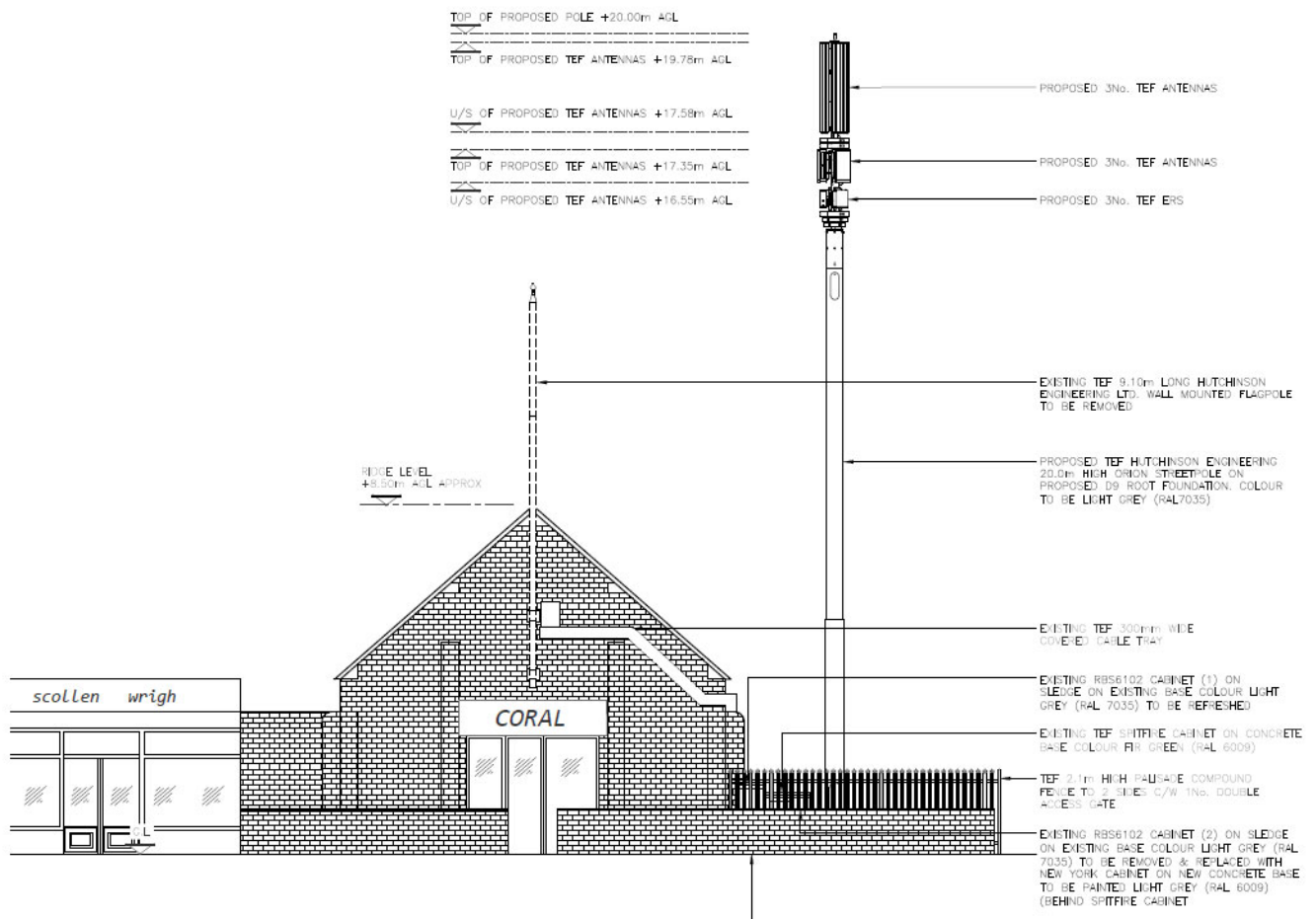
Figure 3



As captured below this is a new SW Monopole but in effect this is an upgrade as the existing TEF site is being removed off the roof of the adjacent building.

The proposal is captured below in Figure 4:

Figure 4:



The proposal is for the installation of a new 20m monopole that is an upgrade of the adjacent roof top site. The roof top cannot take the 5G equipment and thus this will be removed. The proposed newly upgrade site will provide new coverage for VF and TEF. The proposed new facility will require the installation of a limited number of equipment cabinet housing radio equipment at ground level and in close proximity to the base of the pole. The cabinet equipment are however, permitted development (without Prior Approval) and thus do not form part of this application.

The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. VF and TEF have a network sharing agreement and thus these installations are fully compliant with the NPPF. Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 124) of the National Planning Policy Framework. It states:

“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

In keeping with the National Planning Policy Framework (NPPF). guidelines of using: “high quality communications” (Section 10), the proposed design has been selected to

minimise visual impact upon the street scene by integrating with the existing built environment.

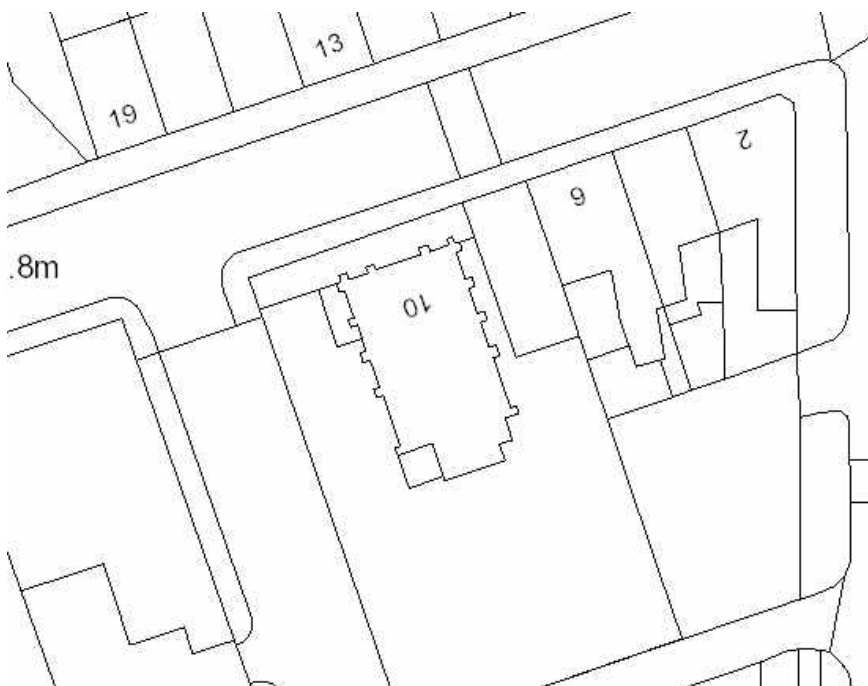
The design of the proposed equipment is considered to be the least visually intrusive option available. In keeping with the National Planning Policy Framework (NPPF), guidelines of using: “high quality communications infrastructure”, the proposed street works monopole design has been selected to minimise visual impact upon the street scene by integrating with the existing street furniture, having similar vertical lines and overall appearance to the street lighting columns that are common feature in the built environment. As stated above the National Planning Policy Framework advocates site sharing, and as such we believe that there are no sequentially preferable locations within the defined site search area.

Site Ref	11419625	Site Address:	Reuben Page Bookmakers (Coral), 10 Ethel Terrace, Castletown, Sunderland, SR5 3NQ
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Local Planning Authority: Sunderland City Council

Development Plan: Sunderland UDP alteration No. 2 (Central Sunderland)
Adopted Policies (saved policies) (2007) / City of Sunderland
Adopted Unitary Development Plan 1998 (saved policies)

Fig.1 – LP Map (extract – reference only)



Site and its surrounds

Policy Relevant to the Development Site:

The site is designated as being within the settlement boundary, with urban uses to the north, east, south and west. The site designation is not a material consideration.

Sunderland City Council does have a specific telecoms policy. This, together with the NPPF is of relevance. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with the NPPF.

Policy Analysis:

Policy B26 reads:

“Telecommunications

Telecommunications development will be permitted where it would not have a serious adverse effect on residential amenity, the appearance of the area, or sites of archaeological or nature conservation value. Where such effects are considered likely, the city council will also take into account the following factors:-

- (i) the significance of the proposed development as part of a telecommunications network;
- (ii) whether any satisfactory alternative sites for telecommunications development are available;
- (iii) whether there is any reasonable possibility for sharing existing telecommunications facilities;
- (iv) in the case of radio masts or towers, whether there is any reasonable possibility of erecting antennae on an existing building or structure;
- (v) whether all reasonable steps will be taken to minimise the impact of the development on local amenity.

Where permission is granted for a building or other structure used for telecommunication, and which is not considered capable of any subsequent use, adequate arrangements will be required to ensure removal of the development when no longer needed.”

The proposed works on this existing site would qualify as a visual change but would not be to the detriment of the surrounding area (knowing the works will be positioned away from most publicly accessible areas and the additional works to the site would have a near benign effect when seen from the surrounding area (as well as being seen in the commercial context of the area)), and would not result in demonstrable harm to its character (over or above that currently experienced). The works would respect and continue to maintain the appearance of the area, and would be suitably distant from potentially sensitive users (the same as existing, being on an existing site), so according with the principles of the policies of Development Plan.

Furthermore, the level of public benefit the scheme would deliver would considerably outweigh any perceived harm to amenity or character change in the area. It fully accords with the requirements of the NPPF

Enclose map showing the cell centre and adjoining cells if appropriate:

This can be emailed to the LPA on request.

Type of Structure:	
Description:	
Existing TEF 9.10m long Hutchinson Engineering Ltd. Wall mounted Flagpole to be removed	
Top of proposed Pole +20.00m AGL	
Top of proposed TEF Antennas +19.78m AGL	
Proposed 3No. TEF Antennas	
U/S of proposed TEF Antennas +17.58m AGL	
Proposed 3No. TEF Antennas	
Top of proposed TEF Antennas +17.35m AGL	
U/S of proposed TEF Antennas +16.55m AGL	
Proposed 3No. TEF ERS	
Proposed TEF Hutchinson Engineering 20.0m High Orion Streetpole on proposed D9 roof foundation. Colour to be Light Grey (RAL7035)	
Existing RBS6102 Cabinet (1) on sledge on existing base colour Light Grey (RAL7035) to be refreshed.	
Existing RBS6102 Cabinet (2) on sledge on existing base colour Light Grey (RAL7035) to be removed and replaced with new York Cabinet on new concrete base to be painted Light Grey (RAL6009) (behind Spitfire Cabinet).	
Overall Height: 20.00m AGL	
Height of existing building:	N/A
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	See drawings
Equipment housing – type of material and external colour:	See drawings

Reasons for choice of design, making reference to pre-application responses:
The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. Telefónica UK Limited has entered into an agreement with Vodafone Limited 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 Limited and Vodafone Limited.

As stated above the National Planning Policy Framework advocates site sharing, and as such we believe that there are no sequentially preferable locations within the defined site search area.

Technical Information

<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)</p> <p>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.</p> <p>When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, Telefónica UK Limited operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p> <p>As part of Telefónica UK Limited network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>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</p>	<p>Yes</p>	
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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.

4. 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

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

The site is required to provide enhanced coverage and capacity for O2. This will improve coverage and capacity in the Castletown Area area. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 250m meaning that it would not be feasible to site the column outside of this locale.

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

5. 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)

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

N/A The Site is an Upgrade

Environmental Information:

Please refer to section 3.

Land use planning designations:

There are no onerous designations

Additional relevant information (include planning policy and material considerations):

This specific proposal forms part of an integral requirement for O2 to expand their respective telecommunications network across Castletown specifically in this instance to enhance coverage levels and network capacity within the SR5 area.

Telefónica O2 UK Limited has entered into a network sharing agreement with Vodafone Limited pursuant to which the two companies plan to share network equipment on a number of sites across the UK. A joint project team has been created, called CTIL comprising Vodafone and O2 employees, to oversee these arrangements. This agreement allows both organisations to consolidate the number of base stations required through sharing which is in accordance with Government Policy, and therefore significantly reduce the environmental impact of network development

This partnership has resulted in the development and production of an array of "dual user" structures and cabinets, which have the ability to accommodate both operator's antenna systems and radio equipment.

Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using their mobiles in their homes and this means we need to position base stations in, or close to, residential areas.

A further limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However if this overlap is too great unacceptable interference is created between the two cells.

DEVELOPMENT PLAN POLICY.

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

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

NATIONAL PLANNING POLICY

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

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

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

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

Paragraph 112 states:

“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).”

It continues in Paragraph 113:

“The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic

communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate."

Operators always follow the sequential site selection process. Where an existing site can be shared or upgraded this will always adhered to before a new proposal is put forward for consideration.

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

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

LOCAL PLAN POLICY

The relevant Local Plan policies Sunderland City Council – adopted Local Plan first review alteration) are highlighted below. The telecoms policies that are not relevant to this application have been removed.

Conclusion

We consider the development complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community while minimising visual impact.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

On the basis of a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the requirements of the National Planning Policy Framework and the Council's Local Plan Policies.

Confirmation that submitted drawings have been checked for accuracy

Name: (Agent)	Principal Planner Damian Hosker BA(Hons) MA MRTPI	Telephone:	Emailed upon request
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Signed:		Date:	25 th January 2021
Position:	Principal Planner	Company:	(on behalf of Cornerstone and above operator)