

**5G SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION
STATEMENT PREPARED BY DOT SURVEYING**

1. Site Details

Site Name:	Stockton Road Street works	Site Address:	Stockton Road, Ashbrooke, Sunderland, SR2 7DE
NGR:	E: 439623 N: 556267		
Site Ref Number:	SDL14733	Site Type:	Proposed 5G telecoms installation: 15m high 'slim line' Phase 8 H3G street pole c/w wrap around cabinet and 3no. cabinets with ancillary works– to be coloured black.

2. Check List

Site Selection

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

Pre-application consultation with the Sunderland City Council

Written offer of pre-application consultation:	N/A	
Was there pre-application contact:		Yes
Date of pre-application contact:	17 th February 2021	

<p>Name of contact:</p> <p>highways.records@sunderland.gov.uk julie.edmondston@sunderland.gov.uk</p> <p>planningapplications@sunderland.gov.uk</p>	<p>Local Planning Authority and Ward Members – by email</p>
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Summary of outcome/Main issues raised:

H3G (Three) is committed to providing improved network coverage and capacity, most notably in relation to 5G services. In these unprecedented times of the Covid-19 pandemic, it is recognised that high-speed mobile connectivity is the lifeblood of a Community; facilitating educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, **enabling e-commerce and working from home**, as well as enjoying access to social, media and gaming for leisure time activities.

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

Following the submission of an e-mail to the council’s planning department, to be best of our knowledge no formal response has been received. The e-mail communication included a set of planning drawings, site information sheet and an explanation behind the requirement for a new telecommunications installation. The information sheet also included other sites that have been investigated and discounted. Further details of the discounted sites are included within this document.

Please note that following the submission of pre-consultation with the LPA and Ward Members and some feedback received, we have, in conjunction with our client reviewed height of the proposed installation and now are coming forward with a reduced height – down to 15 meters monopole and be coloured black to reduce any potential visual impact of this development at this carefully considered site.

Ten Commitments Consultation

<p>Rating of Site under Traffic Light Model:</p>	<p>AMBER</p>
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Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss the development proposal and identify any site-specific issues.

The site has been given an AMBER rating under the Traffic Light Model 'TLR'.

Summary of outcome/Main issues raised:

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

Full details of the scheme are outlined within the planning drawings SDL14733_PLANNING_REV_B.

H3G consider a 'street works' installation positioned upon Stockton Road (existing asphalt footpath located off Stockton Road), is best suited to extend high-speed mobile coverage to the target community. The scheme is also considered to fit with the Local Authority's critical role in delivering the UK Government's Digital connectivity vision and provides a basis for the Sunderland City Council to support the request for plans to speed up digital infrastructure rollout, as outlined by Ministers on the 27th of August 2020.

School/College

Location of site in relation to school/college:

No schools/colleges were identified within the range of the site.

Outline of consultation carried out with school/college:

Given the distance there was no consultation undertaken with the school on this proposal.

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?		No

Details of response:

N/A

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	3rd March 2021	

3. Proposed Development

The proposed site:

The proposed solution for improving 5G coverage here involves erecting a new 15m high H3G 'slim line' Phase 8 street pole c/w a wraparound cabinet and 3 additional equipment cabinets installation upon a small grassed area next to the footpath that runs along the side of Stockton Road, Sunderland (E: 439623 N: 556267).

The technical details of this proposal are illustrated within the enclosed application design drawings: - SDL14733_PLANNING_REV_A. It is recognised that the very nature of installing new 5G communications infrastructure within an urban setting requires a well-measured balance between the need to extend practical coverage with the risk of increasing visual intrusion.

Three are in the process of building the UK's fastest 5G network and has 140MHz of 5G spectrum (and 100MHz of it contiguous), which means our service will be much faster and shall have the ability to handle more data. In making this technology available to customers, H3G will need to provide a mix of upgrades involving existing sites and the building of new sites. **New sites will be needed for many reasons, including the higher radio frequencies used for 5G, which do not travel as far as those frequencies currently in use. In addition, not all existing sites will have the capacity of being upgraded.**

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

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

The site selection process has also been influenced by the topography of the area, trees and vertical elements of street furniture distributed around the vicinity of the site, including street lighting columns. The apparatus (pole and associated cabinets) will be carefully positioned on a small grassed area, off the pavement so not to impede pedestrians and also to have the trees on green area to provide some screening. Please note, the design itself is typical of street furniture found in such urban locations. The decision to site the installation off the footpath will ensure the pedestrian pavement running along this section of Stockton Road will remain clear for pedestrians.

The equipment is considered unlikely to have any material impact on the local area; however it should bring significant connectivity improvements, which is a material consideration in the judgment of the site suitability. The cell search area was assessed at the survey stage from the perspective of planning and residential amenity, while a detailed site evaluation in line with Policy BH6 Quality Communications within the Sunderland City Core Strategy and Development Plan 2020.

In this location, existing base stations are not capable of supporting additional equipment to extend coverage across the target area and prospective 'in-fill' mast sites are extremely limited. Other sites have been identified and subsequently discounted (Refer to Section 6, Figure 5). Notwithstanding, there is an acute need for a new telecommunications installation to deliver the required community coverage.

Figure 1 - Site Photographs (extract from google street view, google maps).



Figure 2 – Site Photo (street view from google maps looking north-east) from Ashmore Terrace. Aspect includes trees, lamp posts, and residential properties.



Figure 3 - Extract from Google street view (street view from google maps looking east) from Park Road.

Aspect of street furniture, trees, and residential properties.





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

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

Planning Policy Relevant to the Development Site:

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

Local Planning Authority: Sunderland City Council

Local Plan: Policy BH6 Quality Communications - the Sunderland City Core Strategy and Development Plan 2020.

Policy

BH6 Quality communications

1. Development should include high quality digital infrastructure, providing access to services from a range of providers.
2. Development for the installation of new telecommunications infrastructure must demonstrate that:
 - i. there would be no significant adverse effect on the external appearance of the building or on the space in which they are to be located;
 - ii. there would be no significant adverse impact on the special character and appearance of heritage assets

- iii. the applicant has explored the possibility of sharing facilities, such as masts, cabinet boxes, satellite dishes and antennae on existing buildings or other structures;
- iv. opportunities to miniaturise and camouflage any telecommunications apparatus have been explored;
- v. they are appropriately designed, coloured and landscaped to take account of their setting; and
- vi. there would be no significant adverse impact on the visual amenities of neighbouring occupiers.

9.21 Digital technologies have been a major driving force in influencing and shaping industry and society in the last few years. Changes that are currently transforming our working, learning, leisure and community environments will need to be integrated into future developments.

9.22 The council will seek to ensure that the development of modern telecommunications equipment is sympathetic to our townscape and countryside. The aim is to ensure that telecommunications equipment is kept to a minimum through encouraging the sharing of existing and/or proposed facilities where this is technically possible. The visual impact of telecommunications equipment can be minimised through careful design, placement, colouring and landscaping. This will help to protect the character of an area and the appearance of property.

9.23 Policy BH6 applies to planning applications or prior notification applications for the installation of satellite dishes, microwave antennae, radio masts, cabinet boxes and other types of telecommunications apparatus which require planning permission. When considering such applications the council will also have regard to the legal requirements placed upon telecommunications operators to provide an adequate service, and any technical and operational constraints that may be faced.

❖ Extract from Sunderland City Core Strategy and Development Plan 2020

We have sought to comply with this policy and also feedback received at the pre-con stage for this Prior Approval submission.

In this instance, a new 15-metre-high H3G 'slim line' Phase 8 street pole with associated 3no. equipment cabinets (colour black RAL-9005) are to be positioned upon the area of existing asphalt footpath located off Stockton Road to reduce any potential visual impact. For the reasons listed above, the proposed site and scheme is not considered to pose an undue onerous material consideration and favourable determination is invited.

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

Policy Analysis:

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

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

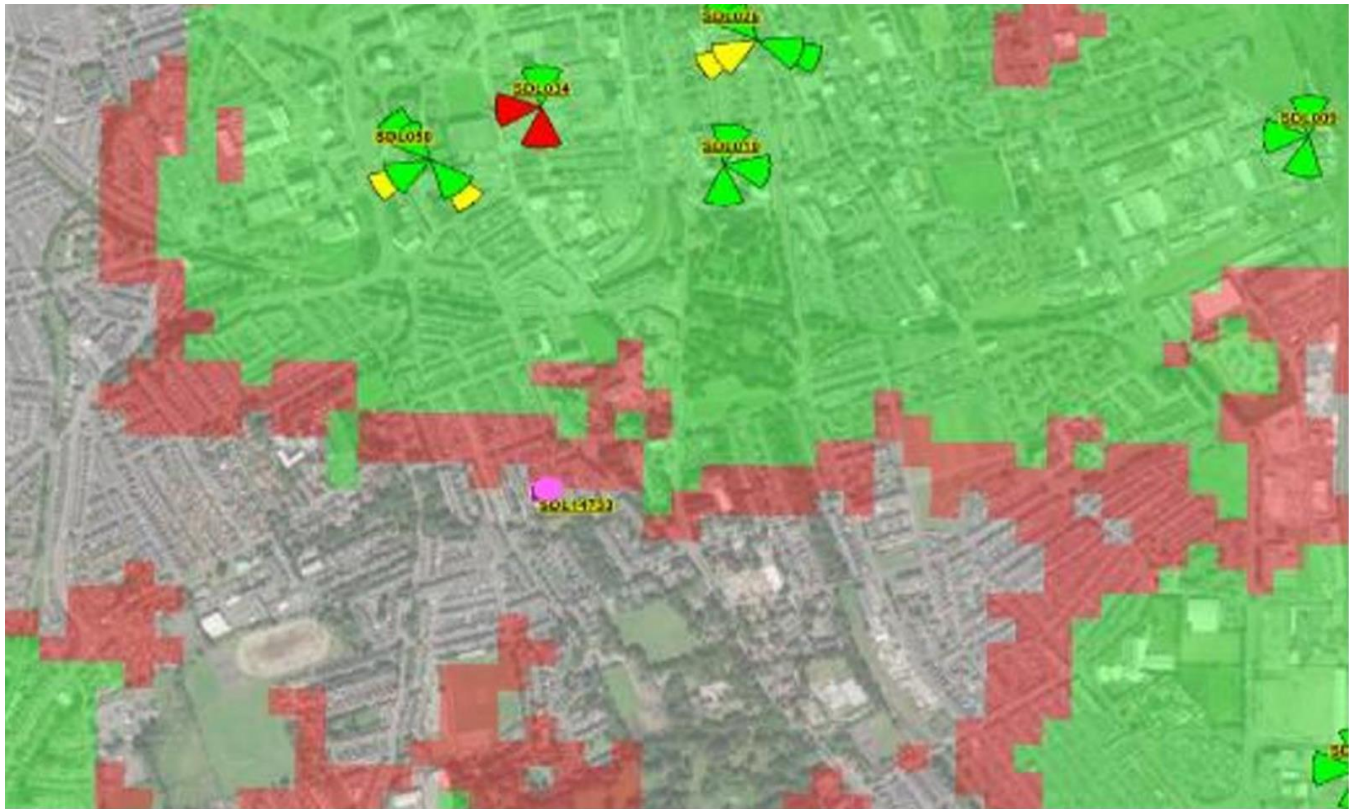
In keeping with the National Planning Policy Framework (NPPF) guidelines of using: “high quality communications” (Section 10), the proposed design has been selected to minimise visual impact upon the streetscape by integrating with the existing built environment.

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

Enclosed map showing the cell centre and adjoining cells:

The optimum solution from the perspective of cell planning and radio coverage has been put forward. The target Search Area and existing H3G (Three) UK sites are illustrated within Figure 4 below:

Figure 4 - Coverage Map: Proposed installation must be located close to the pink marker – SDL14733.



Type of Structure

Description:

Proposed 'Slim line' Phase 8 Monopole c/w wrapround Cabinet at base and 3 no. additional equipment cabinets.

Overall Height:	15m AGL
Height of existing building	N/A
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings

Materials

Tower/mast etc. - type of material and external colour:	Phase 8 Monopole, colour Black RAL-9005
Equipment housing - type of material and external colour:	Profile steel cladding, colour Black RAL-9005

Reasons for choice of design:

The proposed installation is an H3G LTE (Three) Phase 8 Monopole which will support the UK Government Digital connectivity vision and provide a basis for support from Sunderland City Council to speed up digital infrastructure rollout set by Ministers on the 27th of August 2020. Such development will facilitate educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses,

enabling e-commerce and working from home – essential in these times of COVID-19 - as well as enjoying access to social, media and gaming for leisure time activities.

In accordance with the requirement set within National Planning Policy Framework (February 2019) guidelines; the proposed 'Streetworks' design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture.

4. Technical Information

<p>ICNIRP Declaration attached</p> <p>ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). Public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on the site are taken into account.</p>	<p>Yes</p>	
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5. Technical Justification

<p>Reason(s) why site required</p> <p>The National Planning Policy Framework (NPPF) clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this, the Applicant considers it important to explain the positive technical justification for the site and how the facility fits into the overall network.</p> <p>The site is required to provide new 5G coverage for H3G LTE, improving service in and around Ashmore Street/ Stockton Road/ Park Road. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 50m. In general, it would not be feasible to site the installation too far from the target locale (Refer to Figure 4).</p>
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6. Site Selection Process – alternative sites considered and not chosen.

<p>Discounted Options</p> <p>In accordance with the sequential approach outlined in the NPPF, the following search criteria have been adopted. Firstly, consideration is always given to sharing any existing telecommunication structures in the immediate area, secondly; consideration is then given to utilising any suitable existing structures or buildings and thirdly, sites for freestanding ground-based installations are investigated.</p> <p>This sequential approach is outlined below:</p>
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- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground Bases Installations

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

Discounted Options and National Planning Policy:

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

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

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

The DSA is located within Ashbrooke, Sunderland, North East England. The DSA is focused heavily on a residential setting with the wider DSA in the area of the radio planners arrow continuing deeper into the residential area away from the A1231 along Ryhope Road. There are many small residential side streets packed with detached houses branch off intermittently from Lorne Terrace, with few privately maintained roads. Option is on asphalt pavement adjoining the A1231, Ashbrooke, Sunderland.

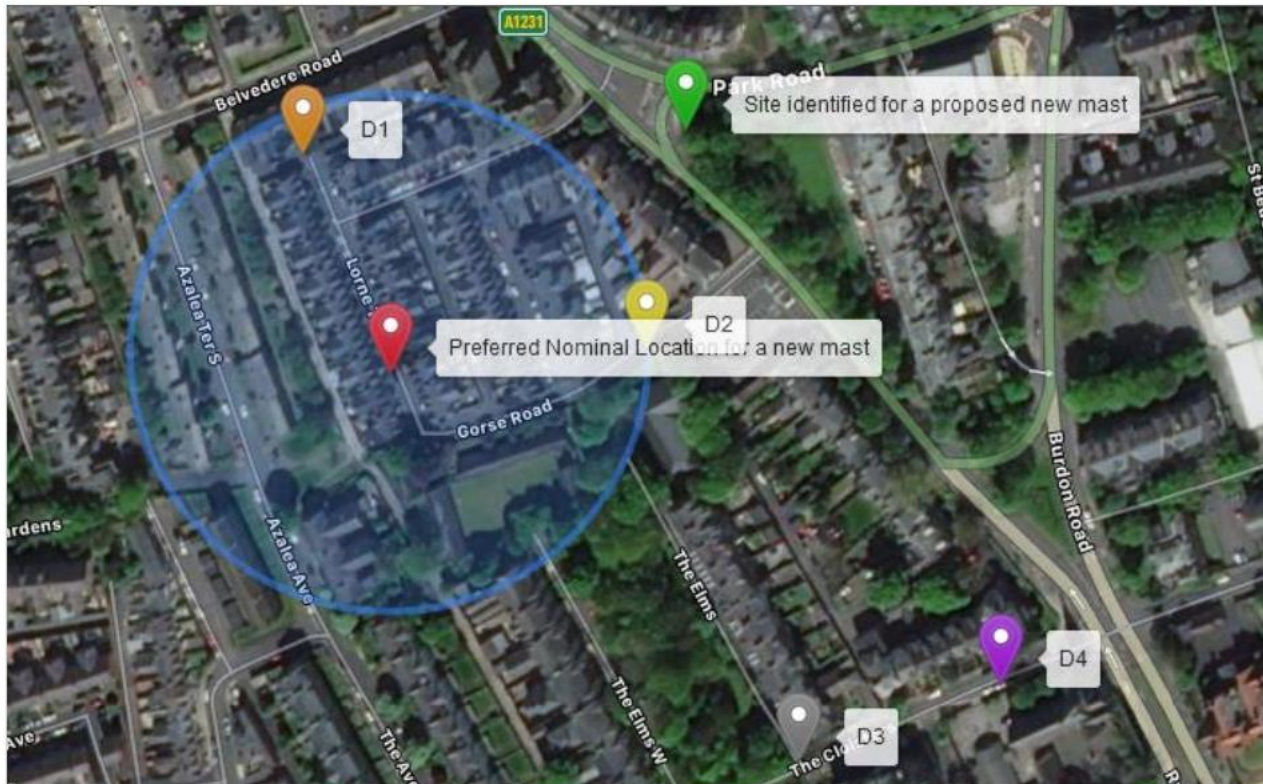
Following a site search we have concluded that the site put forward is the best solution to bring enhanced 5G service to this area. We have strived to find the most suitable site and, following pre-consultation, have reduced the height from 20 meters down to 15 meters. We believe that given the presence of tall trees, lampposts and telegraphs poles in the immediate vicinity, this site is suitable for the proposed new telecoms installation.

Discounted Options:

As part of the site search and discounting of potentially suitable locations, the streets and properties were visited and for the reasons given discounted.

Site Reference	/ NGR	Reason why discounted
1. Lorne Terrace	E: 439475 N: 556256	This was the site of the preferred Nominal Location. It is a street of two-storey terraced residential properties with narrow pavement and small garden directly off. No suitable location for a street works installation here.
2. Gorse Road	E: 439608 N: 556182	This road has a mixture of single storey terraced properties and large gable ends of the two storey properties. Very narrow pavements and no suitable site for a street works installation. Also, in close proximity to a nursery.
3. The Elms	E: 439668 N: 556025	Too narrow and no footpaths to support street works installation here.
4. The Cloisters	E: 439746 N: 556055	Residential area comprising 2 storey terraced houses and 5 storey flats. There are trees within some of the gardens which could soften the impact of a mast however not deemed to be suitable for a street works installation.

Figure 5 - Proposed Site Location: 100m DSA (Desired Search Area) shown circled.



7. Additional Relevant Information

Background to the Proposal

H3G supports Government ambition to be a global leader in the next generation of mobile technology set out within its March 2017 white paper, 'Next Generation Mobile Technologies: A 5G strategy for the UK' and expand its mobile network across the Sunderland City Council area and specifically in this instance, to enhance 5G coverage levels in and around the Ashmore Street/ Park Terrace.

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

The proposed scheme has been designed to ensure the fundamental principles of good siting and appearance are adhered to. The overall impact of the installation on the environment is therefore considered limited when viewed in the context that high-speed mobile connectivity is the lifeblood of a Community.

DEVELOPMENT PLAN POLICY:

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

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

NATIONAL PLANNING POLICY:

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

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

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

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

Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 112 states:

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

It continues in Paragraph 113

“The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.”

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

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

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

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

Conclusion

Government considers that high-speed mobile connectivity is the lifeblood of a Community. H3G (Three) is committed to providing improved network coverage and capacity, most notably in relation to 5G services.

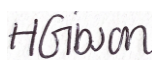
Taking into account the site-specific factors and technical constraints, available options and planning constraints, it is considered that the proposed 15-meter-high street pole clearly represents the optimum environmental solution to extend coverage to the target Community.

The use of the public highway to accommodate a new telecommunications installation complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community, while minimising visual impact. In this particular instance, following an initial desktop survey and subsequent physical search of the intended area, due to the nature of the proposed equipment, location (footpath alongside a grass verge with trees and bushes), existing street furniture (including street lighting columns), after careful analysis, we believe the proposed site will minimise any visual impact upon the immediate and wider area, while at the same time, significantly improving communications within the local vicinity.

In accordance with a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the National Planning Policy Framework and along with the Council's Local Plan (2018) and in particular DM33 – Telecommunications.

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

Contact Details

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Signed:		Date:	3 rd March 2021
Position:	Planner	Company:	Dot Surveying Ltd
		(on behalf of above operator)	