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| **SITE SPECIFIC SUPPLEMENTARY INFORMATION** |

1. Site Details

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| Site Name: | Comberton Place DNS | Site Address: | Comberton Place  Kidderminster  Worcestershire  DY10 1QP |
| NGR: | E: 383703 N: 276317 |
| Site Ref Number: | 97508 | Site Type: Macro | Streetworks (NTQ- Notice to Quit) |

1. Pre-Application Check List

**Site Selection**

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| Was an LPA mast register used to check for suitable sites by the operator or the LPA? |  | No |
| If no explain why:  After a phone call to the LPA 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 LPA**

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| Date of written offer of pre-application consultation: | 17th March 2021 | |
| Was there pre-application contact: |  | No |
| Date of pre-application contact: | N/A | |
| Name of contact: | The Director of Planning | |
| Summary of outcome/Main issues raised:  At the time of preparing this submission, and despite our attempt to engage in pre-application dialogue with the LPA, no comments had been received in respect to the proposals. | | |

**Ten Commitments Consultation**

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| Rating of Site under Traffic Light Model: |  | Amber |  |
| Prior to the submission of this application the applicant initiates pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues. | | | |

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| Summary of outcome/Main issues raised:  No responses had been received at the time of submission. |

**School/College**

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| Location of site in relation to school/college:  Hokey Cokey Nursery is in close proximity to the site. |
| Outline of consultation carried out with school/college:  Hokey Cokey Nursery was notified. |
| Summary of outcome/Main issues raised:  No response at the time of submission. |

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

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| 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**

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| Copy of Developer’s Notice enclosed? | | Yes |  |
| Date served: | 8th April 2021 | | |

1. Proposed Development

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| The proposed site: |
| It is imperative to consider that this proposal is to replace an existing installation and is not a new additional mast. The need for this new mast stems from MBNL having been issued with an NTQ (Notice to Quit). The DSA (Designated Search Area) centres around the NTQ 63203 Market Hall (Temporary). The immediate area consists mainly of newly developed residential properties. This application (if approved) is to facilitate the removal of the temp mast. The temp mast location is illustrated below in Figure 1:  Figure 1 (Temp NTQ 63203 Market Hall):  The proposal is for the installation of a new 17.5m monopole that will provide new coverage for EE and has the potential for H3G LTE. 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 existing temp site and new proposed site can be seen below in Figure 2:  Figure 2:  This report outlines the re-search for the NTQ site 63203 and follows the recent withdrawal of the planning application at the Market Hall development. A temporary site has recently been installed at Market Hall and this will provide interim coverage. The monopole style design has been specified in order to allow the proposal to merge with the numerous street lighting columns distributed around the vicinity of the site.  The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. H3G and EE and ESN (Emergency Services Network) 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 and 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.  The design of the proposed equipment is considered to be the least visually intrusive option available.   |  |  |  |  | | --- | --- | --- | --- | | Site Ref: | 97508 | Site Address: | Comberton Place, Kidderminster, DY10 1QP |     Local Planning Authority: Wyre Forest District Council  Development Plan: Wyre Forest District Council Core Strategy 2006-2026 (2010) / Wyre Forest District Council Site Allocations and Policies Local Plan (2013)  Fig.1: LP Plan 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 / commercial uses to the north, east, south, and west. The site designation is not a material consideration.  Wyre Forest District 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 **SAL.CC5** states:  “Telecommunications  Proposals involving the erection of telecommunications equipment will be allocated where it is satisfactorily demonstrated that:  i. There is clear evidence of need for the development.  ii. It is sited and designed so as not to result in significant adverse impact to interests of acknowledged importance, subject to operational and technical requirements.  iii. There are no satisfactory alternative available sites.  iv. There is no reasonable possibility of sharing facilities.  v. There is no possibility of erecting antenna on an existing building or structure.  Proposals that will individually or cumulatively have a serious adverse impact on sensitive landscape, townscape or nature conservation will not be approved.  All proposals for telecommunications infrastructure must demonstrate that they meet International Commission guidelines for public exposure.  NOTE: Conditions or S.106 Obligations will be sought to facilitate the future sharing of a facility, or the removal of a facility on obsolescence.”  The proposed development at this site is required to deliver the requisite level of electronic communication service on a structure designed to accommodate multiple future users (so enable future site sharing opportunities), yet seeks to minimise its visual impact or change to the character of this location (the scale and design being considered appropriate in this predominantly commercial location). The form and design of the proposed configuration would not appear out of context in this location, so according with wider Development Plan policy. With regards the removal of the installation on cessation of operation, it is considered the application of a planning condition is suitable and reasonable, and would accord with the condition tests as prescribed in the PPG.  The public benefits of a greatly enhanced communications network for businesses, residents and visitors alike in this location would qualify as a demonstrable positive that would contribute to the wider economic output of the area. The proposal fully accords with the requirements of the NPPF. |

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| Enclosed map showing the cell centre and adjoining cells: |
| This can be emailed to the LPA upon request. |

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| Type of Structure | | |
| Description:  PROPOSED 17.5m HIGH (SPECIAL) EE/H3G PHASE 6 STREETWORKS POLE ON ROOT FOUNDATION.  PROPOSED EE/H3G MK5B LINK/AC CABINET ON CONCRETE BASE.  PROPOSED H3G POGONA CABINET ON CONCRETE BASE.  PROPOSED 1 OF 8No. BOLLARDS.  PROPOSED H3G BOWLER & APM5930 CABINET ON CONCRETE BASE.  PROPOSED EE/H3G MK5B LINK/AC CABINET (TX) ON CONCRETE BASE.  PROPOSED EE COBRA CABINET ON CONCRETE BASE.  PROPOSED EE/H3G WRAP-AROUND CABINET BUILT AROUND BASE OF STREETWORKS POLE.  TOP OF TOWER +17.5m AGL.  C/L OF APERTURES +16.47m AGL.  C/L OF APERTURES +14.11m AGL.  C/L OF DISH +12.20m AGL. | | |
| Overall Height: 17.5m AGL | | |
| Height of existing building | | N/A |
| Equipment Housing: | | |
| Length: | |  |
| Width: | |  |
| Height: | |  |
| Materials | | |
| Tower/mast etc – type of material and external colour: | Goose Grey | |
| Equipment housing – type of material and external colour: | Grey Steel | |

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| Reasons for choice of design: |
| The proposed installation is an EE Ltd and H3G LTE Phase 6 Streetworks Pole which will house both EE and H3G LTE. The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF.  In keeping with the National Planning Policy Framework (NPPF July 2018). guidelines of using high quality communications infrastructure the proposed 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 numerous street lighting columns . |

1. Technical Information

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| ICNIRP Declaration attached  ICNIRP 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. | Yes |  |

1. Technical Justification

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| Reason(s) why site required |
| 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.  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 new 5G coverage for EE Ltd in order to improve coverage in the DY10 area of Kidderminster. 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. |

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

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| Discounted Options |
| In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF) following search criteria have been utilised. Firstly, consideration is always given to sharing any existing telecommunication structures in the area, secondly consideration is then given to utilising any suitable existing structures or buildings and thirdly sites for freestanding ground-based installations are investigated.  This sequential approach is outlined below:   1. Mast and Site Sharing 2. Existing Buildings Structures 3. 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 Ofcom Site Finder mast register is always examined prior to the submission of an application. |

**Discounted options:**

**D1** Railway Bell Hotel E: 383797, N: 276361. A two-storey public house on the periphery of the DSA. The property was not considered to be of suitable height to provide the required coverage to replicate the NTQ location and was discounted during the search.

**D2** Kidderminster Railway Station E: 383831, N: 276273. The station occupies a large area of land to the east of the DSA, however there is no space evident on site to accommodate a greenfield installation and this option was discounted.

**D3** Station Approach DNS E: 383766, N: 276342 . A potential DNS on the pavement adjcent to the station. The pavement is cluttered with limited space available and evidence of underground services. This option was not progressed further.

**D4** Severn Valley Railway Car Park E: 383697, N: 276045.The remainder of the car park lies outwith the DSA and in close proximity to the existing installation at Aggborough Stadium (16437), the preferred location at this property is therefore as outlined for Option 2.

**D5** A451 Streetworks E: 383494, N: 276302. The verge adjacent to the busy A451 ring road was reviewed during the search. This option lies on lower ground than those recommended below which are considered to be preferable in the first instance.

**D6** Morrisons Supermarket E: 383419, N: 276300. The supermarket is located on substantially lower ground meaning any coverage is likely to be compromised. Furthermore, there appears to be little space available on site to accommodate an installation.

**D7** Museum of Carpet E: 383379, N: 276329. A two-storey pitched roof building located on lower ground. This option was not considered to be suitable and discounted at the search stage.

**D8** Dunhelm Mill E: 383361, N: 276377. A low-level building again located on lower ground relative to the NTQ site. This option was not considered to suitable and was not progressed further.

**D9** Lion Fields Development E: 383434, N: 276518. A large development site occupying the north-west area of the DSA. Given the future development of the land and the timescales involved this option was discounted.

**D10** Comberton Hill Streetworks E: 383540, N: 276435. The pavement is located on lower ground and overlooked by residential accommodation adjacent.

**D11** Tesco Metro E: 383624, N: 276418. A low-level rooftop located on lower ground offering little scope for a rooftop installation to provide the requisite coverage.

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| If no alternative site options have been investigated, please explain why:  N/A |

1. Additional Relevant Information

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| Background to the Proposal |
| This specific proposal forms part of an integral requirement for EE Ltd, ESN and H3G LTE to expand their respective 5G telecommunications network across Worcestershire specifically in this instance to enhance 5G coverage levels and network capacity within the DY10 area.  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 Governments 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.”*  **Conclusion**  We consider that the development is complaint with the council’s policy and that in accordance with Section 38 (6) of the Planning and Compensation Act 2004 permission should be granted for the installation.  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 Council’s Local Plan Policies.  (Damian Hosker BA(Hons) MA MRTPI)  Planning Consultant  Email: [d.hosker@whptelecoms.com](mailto:d.hosker@whptelecoms.com) |

Contact Details

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| Name: (Agent) | Damian Hosker BA(Hons) MA MRTPI | Telephone: | 07771 527 070 |
| Operator: | EE and H3G LTE | Fax no: | N/A |
| Address: | WHP Telecoms  Helena House  Troy Mills  Troy Road  Leeds  LS18 5GN | Email Address: | [d.hosker@whptelecoms.com](mailto:d.hosker@whptelecoms.com) |
|  |  |  |  |
| Signed: |  | Date: | 9th April 2021 |
| Position: | Principal Planner | Company:  (on behalf of above operator) | WHP |