

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

1. Site Details

Site Name:	Barton Lane street works	Site Address:	Barton Lane, Headington, Oxford, Oxfordshire, OX3 9JW
NGR:	E: 454723 N: 207636		
Site Ref Number:	OXD20183	Site Type:	Proposed 5G telecoms installation: H3G Phase 8 high street pole c/w wrap-around cabinet and; and 3 further additional equipment cabinets.

2. Pre-Application Check List

**Site Selection**

Was the Council's 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 Local Planning Authority**

Written offer of pre-application consultation:	N/a	
Was there pre-application contact:		Yes
Date of pre-application contact:	29/4/2022	
Name of contact:	Email issue to the Local Planning Department.	



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 facilitating the increased need and demand for 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.

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.

**Ten Commitments Consultation**

Rating of Site under Traffic Light Model: **Amber**

Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss development proposals and identify site specific issues.

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 amended, as well as the objectives of the National Planning Policy Framework (February 2019).

It is our opinion that the proposed design presents a better ‘fit’ within the local community and immediate street scape, offering a reduced visual impact upon an area of adopted highway identified, as situated out with a conservation area or other such restrictive designation.

It is considered that the design and siting, accords with Local Authority’s critical role in delivering the UK Government’s Digital connectivity vision and provides a basis for the local planning authority to support the request for plans to speed up digital infrastructure rollout set out by Ministers on the 27<sup>th</sup> August 2020.

**School/College**

Location of site in relation to school/college:

None noted within 200m’s

Outline of consultation carried out with school/college:



N/A
Summary of outcome/Main issues raised:
N/A

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

Will the structure be within 3km of an aerodrome or airfield?		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:	6/5/2021	

**3. Proposed Development**

<p>The proposed site:</p> <p>CK Hutchison Networks (UK) are in the process of supporting the UK Government's Digital connectivity objective and providing a critical role in building the UK's fastest mobile network to provide improved coverage and capacity, most notably in relation to 5G services.</p> <p>The technical details of this proposal are illustrated within application design drawings as attached.</p> <p>The very nature of installing new 5G mast infrastructure within such an urban setting requires a highly considered balance between the need to extend practical coverage reach with that of increasing risk of visual amenity intrusion. In this location, existing mast sites are not capable of supporting additional equipment compliment to extend coverage reach across the target area and prospective 'in-fill' mast sites are extremely limited.</p> <p>There is an acute need for a new base station to provide effective service coverage and in this case, the height of the proposed street pole is the minimum required to bring the benefits of 5G to this area.</p> <p><b>Figure 1 - Site Photograph's</b></p>
--





Proposed location of a new mast shown above will assimilate well into the immediate street scene and not be detrimental.

The proposed site option 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 minimum height 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 located 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)

The relevant Local Plan against which the application will be determined, is



## 2.22 Telecommunications

2.22.1 Some telecommunication development may take place as permitted development. Telecommunication operators wishing to carry out development under the General Permitted Development Order (GPDO) are advised to carry out discussions with the City Council before doing so. Pre-application discussions with the City Council should also take place when prior approval or a full planning application is to be submitted. When seeking planning permission or prior approval, telecommunication operators are required to provide clear evidence that they have fully investigated options for using existing buildings, site sharing and alternative sites. When seeking permission for new sites for telecommunication development, applicants must demonstrate that they have made provision for future demands and site sharing.

**28** *The Local Plan should be read as a whole. Proposals will be judged against all relevant policies.*



2.22.2 Where planning permission is required, the City Council will take account of technical constraints on locating such equipment, the operational requirements, and the legal obligations of telecommunications operators. However, this must be balanced against the need to avoid, as far as possible, the use of unsightly equipment. The planning system should provide for such development, including new forms of broadcasting. The City Council recognises the importance of always ensuring the best outcome in environmental terms, particularly when considering the suitability of mast and site sharing. In addition, developers should minimise any visual impact through careful siting and sensitive use of materials, colour and design of telecommunication equipment. They should also look for ways to disguise or camouflage proposed facilities. Visual impact is of particular concern in listed buildings, conservation areas, green belt, and areas of safeguarded land.

2.22.3 There is significant public concern about health considerations in relation to telecommunication development. The siting of telecommunications equipment raises environmental concerns regarding health and noise issues. However, scientific research on the health implications of telecommunications development is currently inconclusive. Health considerations and public concern can in principle be a material consideration in determining applications for planning permission and prior approval.

2.22.4 Developers can reduce concerns over the health impact of telecommunications development by submitting information on this matter alongside proposals for new equipment. This should be in the form of a Health and Radiation Impact Analysis (HRIA) which provides details on the expected microwave and other radiation from the proposed equipment and how this relates to the EU ICNIRP guidelines. The City Council will issue further information on the content of an HRIA, from time to time, as a Supplementary Planning Document.

#### **POLICY CP.24 - TELECOMMUNICATIONS**

Planning permission, or prior approval, will only be granted for the installation of external apparatus necessary for the transmission or receipt of telecommunications where it is demonstrated that:

- a. alternative existing sites are unavailable for site sharing, and applicants have fully explored the possibility of erecting antennas on an existing building, or other structure, and have demonstrated the need for the development;
- b. the siting and appearance of the apparatus, including any location or landscape design requirements, have been designed to minimise the impact on amenity;
- c. installations are sited to be as unobtrusive as possible;
- d. applicants who propose to carry out telecommunications development have considered the need to include additional capacity to take account of the growing demands for network development, including that of other operators; and
- e. applicants have submitted a Health and Radiation Impact Analysis (HRIA).

The Adopted Roads Register shows that the proposed location falls within adopted Highway.

The National Planning Policy Framework (NPPF) section of this Supporting Statement goes into detailed analysis of why this site is in compliance 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 (shown as by the red outline) and existing H3G (Three) UK sites are illustrated within Figure 4 below:

**Figure 4** - Coverage Map: Proposed installation must be located close to the area shown below.





Type of Structure	
Description: Proposed Phase 8 Monopole c/w wrapround Cabinet at base.	
Overall Height:	See drawings
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:	See drawings
Equipment housing - type of material and external colour:	See drawings

Reasons for choice of design:
<p>The proposed installation is an H3G LTE (Three) Phase 8 Monopole c/w wrap-around cabinet and 3 no. additional equipment cabinets which will support the UK Government Digital connectivity vision and provide a basis for support from the local planning authority to speed up digital infrastructure rollout set by Ministers on 27 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 as well as enjoying access to social, media and gaming for leisure time activities.</p> <p>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.</p>

#### 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>	Yes	
--	-----	--



--	--	--

5. Technical Justification

Reason(s) why site required
<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 to be 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 this area subject to this application. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 50m.</p>

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

Discounted Options
<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> <ul style="list-style-type: none"> <li>a) Mast and Site Sharing</li> <li>b) Existing Buildings Structures</li> <li>c) Ground Bases Installations</li> </ul> <p>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.</p>

**Discounted Options and National Planning Policy:**

<p>The National Planning Policy Framework (NPPF) is clear that LPAs should not question the need for the installation under Part 116:</p> <p><i>“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”.</i></p> <p>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</p>
--



with associated cabinets is deemed to be the only and most appropriate solution available. The DSA (Designated Search Area) is illustrated herein, together with site locations that were investigated and subsequently discounted.

**Discounted Options:**

Site Reference	Reason why discounted
D1 - North Way	verge at bend in road overlooked by residential properties
D2- Aldebarton Drive	visibility splays issues on the corner of the junction.
D3 - Barton Village Road	verges and pavements not wide enough, and land drops sharply from the nominal so coverage to the south would be compromised.
D4 - Barton Road	verges on north side, overlooked by residential properties



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 local planning authority area and specifically in this instance, to enhance 5G coverage levels in and around the site subject to this application.

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.

### **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 10<sup>th</sup> 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 street pole clearly represents the optimum environmental solution to extend coverage to the target Community.

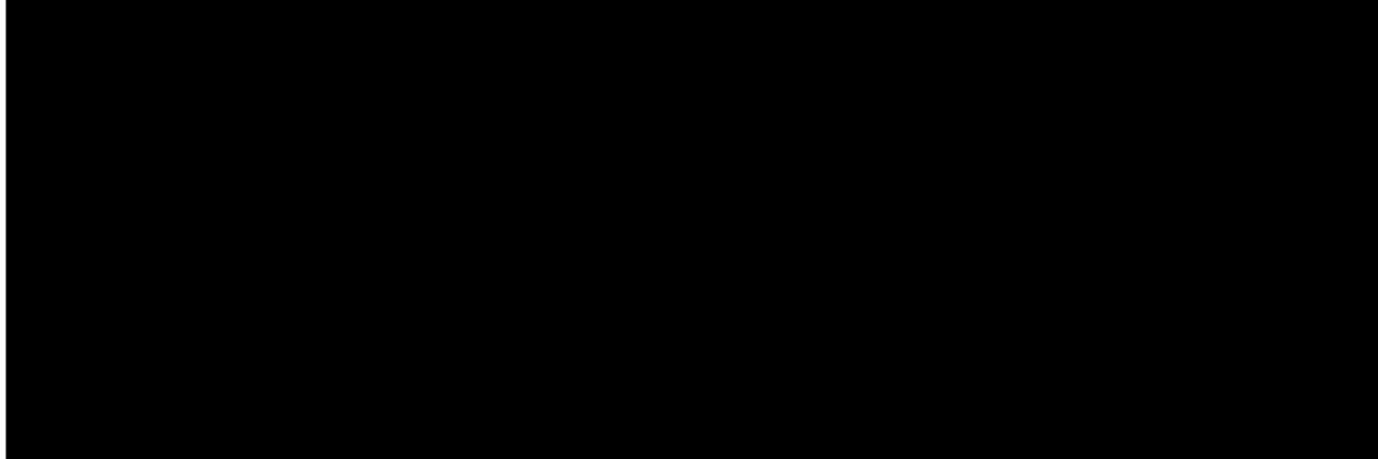
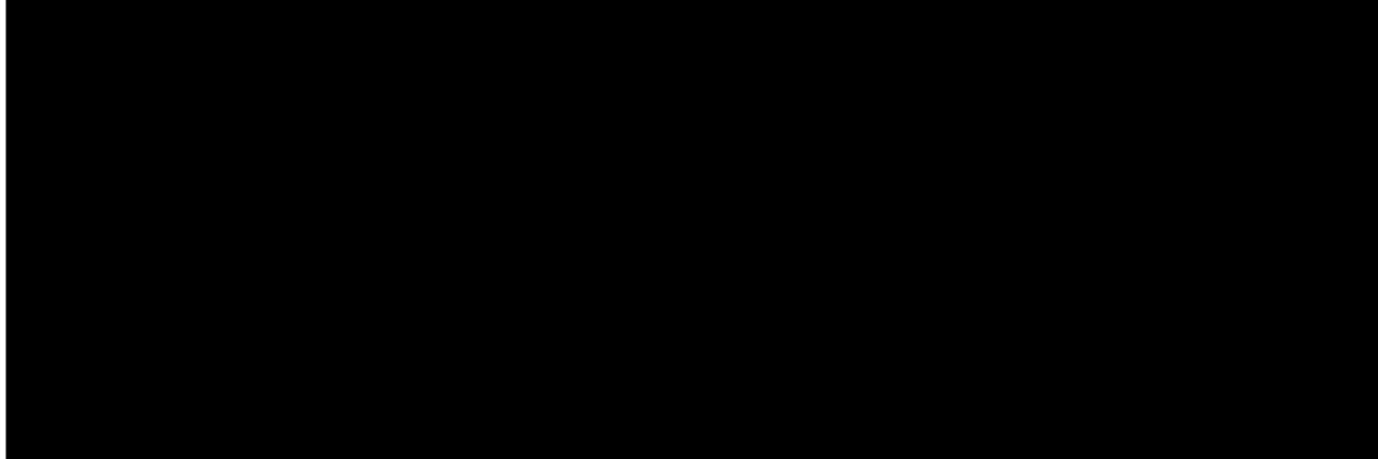
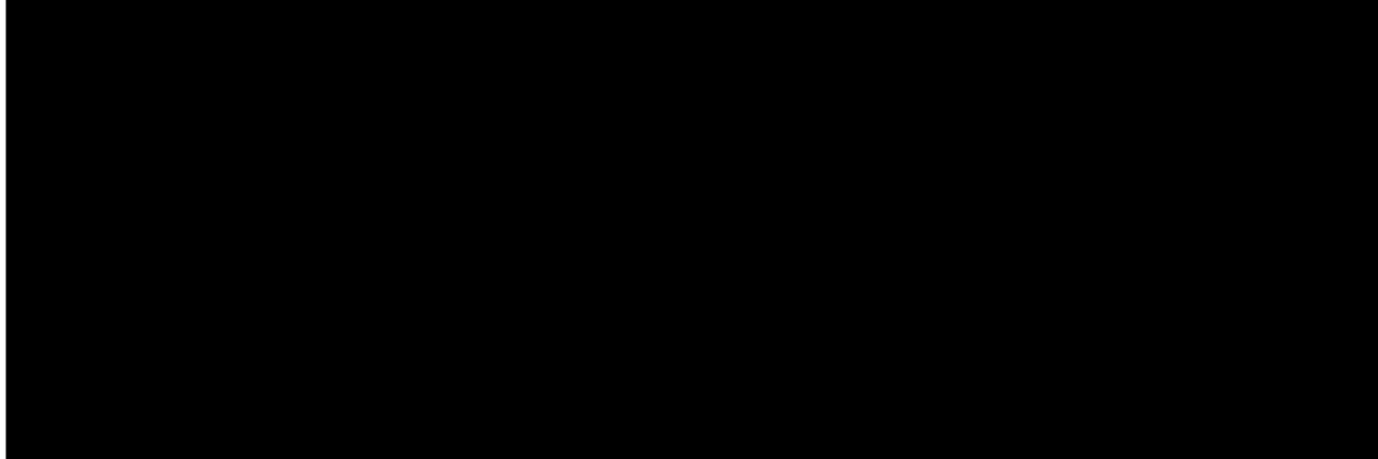



The use of the public highway to accommodate a new telecommunications installation complies with both central government and local planning policy guidance, where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community, while minimising visual impact.

In 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.

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.

### Contact Details

Name: (Agent)	<u>Tom Gallivan</u>	Telephone:	
Operator:	<u>H3G</u>	Fax no:	
Address:	<u>Dot Surveying, The Bonds (Suite 31), 2 Anderson Place, Edinburgh EH6 5NP</u>	Email Address:	
Signed:		Date:	<u>29/4/2022</u>
Position:	<u>Planner</u>	Company:	<u>Dot Surveying</u>
		(On behalf of above operator)	