

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

1. Site Details

Site Name:	Percy Park Rugby Club	Site Address:	Percy Park Rugby Club, Preston Avenue, North Shields, Tyne and Wear, NE30 2BE
NGR:	E: 435611 N: 569396		
Site Ref Number:	96507	Site Type:	Macro NTQ Replacement

2. Check List

**Site Selection**

Was North Tyneside 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 LPA – North Tyneside Council**

Written offer of pre-application consultation:	4 <sup>th</sup> May 2023	
Was there pre-application contact:		No
Date of pre-application contact:	N/A	
Name of contact	The Director of Planning – via Email.	

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.

EE and 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.

Please note an approval was received for application 23/00985/TELGDO which granted approval for the following "Proposed +25m High Monopole Which Includes 6 No. Antennas, 4 No. 600, 4 No. Equipment Cabinets and Associated Ancillary Works." We have since reduced the height of our proposal from 25m to 20m and believe our proposal at Percy Park Rugby Club to deploy a replacement mast nearby to the existing rooftop site that is being removed, possess the least visually intrusive location possible. We would urge North Tyneside Council to approve our application to facilitate continued connectivity for the North Shields area.

### Ten Commitments Consultation

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. Further consultation has also been carried out with the local Tynemouth Ward Councillors (Councillor Lewis Bartoli, Sarah Day and Chris Johnston).	
The site has been given an AMBER rating under the Traffic Light Model 'TLR'.	

### School/College

Location of site in relation to school/college:
King Edwards Primary School is in close proximity to the proposed site.
Outline of consultation carried out with school/college:
Kind Edward Primary School has received a letter of consultation that was sent prior to the submission of the application.
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:	13 <sup>th</sup> November 2023

### 3. Proposed Development

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) on their current installation.

The current rooftop telecommunications equipment is being replaced with a monopole installation to facilitate continued connectivity. The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. H3G and EE have a network sharing agreement and thus these installations are fully compliant with the NPPF. It is key to consider that the ESN (Emergency Services Network) also share on EE masts and thus this installation will also be compatible for ESN.

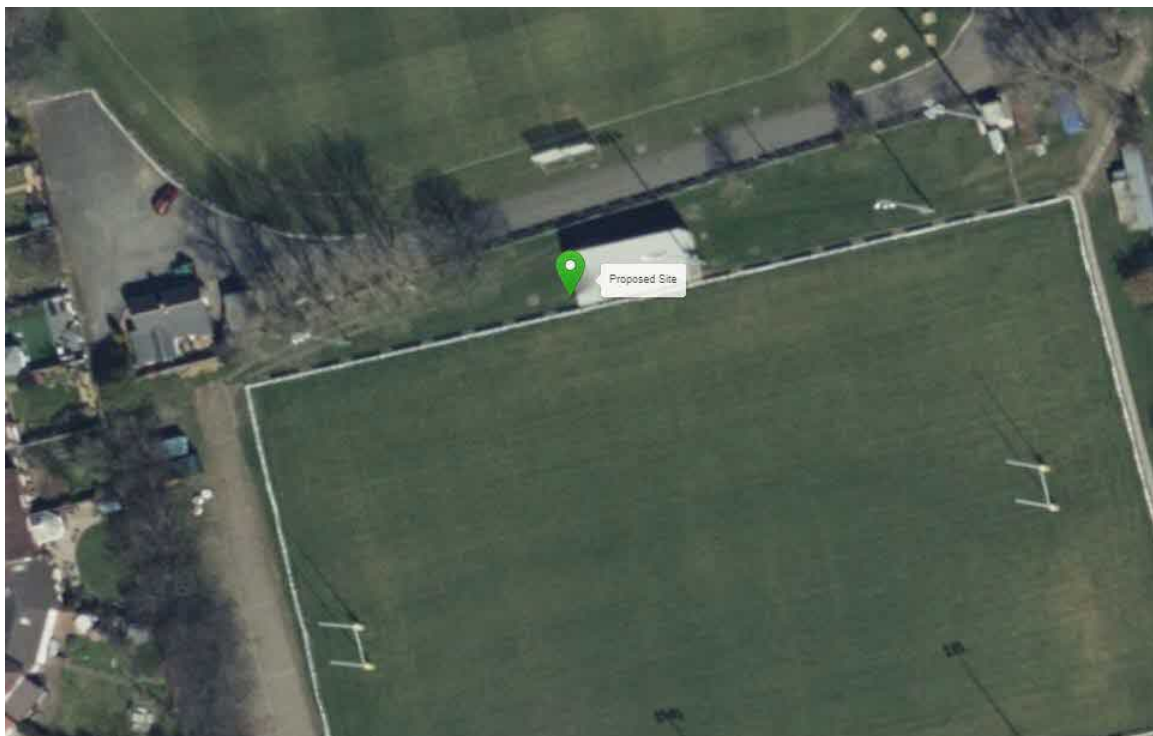
The proposed NTQ (Notice to Quit) can be seen below in Figure 1. The existing rooftop installation is located at Tynemouth College, which has been issued an NTQ (Notice To Quit) due to the condition of the building. The school was closed down in 2020 because of the deteriorating condition of the building structure and rooftops. The poor condition of the building has resulted in the chimney, which the antennas were attached to, being bought down.

Figure 1 - An image illustrating the proposed location for the telecoms installation.



There are no other viable alternative options other than the installation of a telecommunication site in a different location. The proposed location of the telecommunications installation can be seen in Figure 2.

Figure 2 - An image to show the land of the proposed telecommunication equipment.



The proposed telecommunications base station is located within the north site of Percy Park Rugby Clubs grounds. The siting of the proposal has been driven by the requirements to deploy a replacement mast nearby to the existing rooftop site that is being removed, whilst also being in the least visually intrusive location possible. The rugby grounds has been proposed as it will keep the deployment nearby to its users within North Shields, ensuring that the application can fulfil its operational requirements, whilst also being away from sensitive receptors. The positioning to the north of the rugby field and away from residential areas helps to minimise the risk of the equipment becoming visually intrusive. The proposed site will also be in close proximity to multiple tall and vertical monopole flood lights that are around the rugby pitch. The existing street furniture has been utilised to encourage the assimilation of the proposed equipment, working to reduce the visual appearance of the equipment as it will help conceal it within the surrounding area.

In keeping with the National Planning Framework (NPPF) guidelines of using high quality communications infrastructure the proposed design has been selected to minimise its visual impact upon the immediate and wider locale.

The presence of the existing column sets a clear precedent for telecommunications development in this location and indicates that the principle of this proposal is acceptable in terms of siting. 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.

As previously stated, MBNL have been issued with an NTQ (Notice to Quit) for an existing telecommunications site. This submission is purely to replace an existing nearby telecommunications installation that is being removed.

The technical details of this proposal are illustrated within the enclosed application design drawings: 1716744\_96507\_NTY097\_NE1188\_M001 A. The proposed equipment is considered unlikely to have any material impact on the local area as this is a site situated out with the proximity to residential properties. Ultimately, without the proposed site it will result in a severe loss of mobile connectivity in the North Shields area.

The very nature of 5G and the network services it provides, means the equipment and apertures are quite different to the previous and existing, service requirements. In particular, the design of the apertures, and the separation required from other items of associated equipment.

### **Policy Analysis:**

#### **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. The site is an existing telecommunications site.

North Tyneside 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 **DM7.11** states:

The Council supports the development and extension of telecommunications services.

Proposals for new homes or employment development will be encouraged to consider and make provision for high-speed broadband connectivity. Specific proposals for telecommunications development (including radio masts), equipment and installations will be permitted if:

- a. When proposing a new mast, evidence should demonstrate that no reasonable possibilities exist of erecting apparatus on existing buildings, masts or other structures.
- b. The siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity and respect the character or appearance of the surrounding area.
- c. When sited on a building, the apparatus and associated structures are sited and designed in order to seek to minimise impact to the external appearance of the host building.
- d. The development would not have an unacceptable adverse impact on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. When considering applications for telecommunications development, the Council will have regard to the operational requirements of telecommunications networks.
- e. There are no more satisfactory alternative sites for telecommunications available.
- f. There is a justifiable need for a new site.
- g. Proposals subject to government guidelines on non-ionising radiation protection are accompanied by an International Commission on Non-Ionizing Radiation Protection certificate.

The proposed installation would not be visual detrimental to the surrounding area and would not result in demonstrable harm to the character of the area, but are necessary to ensure improved delivery of service, would respect and continue to maintain the character of the area, would continue to be suitably distant from potentially sensitive users, and so would accord with the principles of the policies.

It fully accords with the requirements of the NPPF.

Central Government attaches great importance to the design of the built environment and outlines this within 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. Although it is accepted that there will be an intensification in the amount of equipment it is felt that such a minor increase would not detract from the character of the area in which the proposal sits.

The proposed site is an established telecommunication installation. This submission is purely to replace an existing nearby telecommunications installation that is being removed.

Type of Structure	
Description:  The installation of a 20m H3G/EE Valmont Climable Monopole, 6No Apertures, 4No 0.6m Dishes, 4No Cabinets on Concrete base, Ancillary Equipment, and a 2.4m mesh high panel fence with double gates.	
Overall Height:	20m
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:	Steel - galvanised
Equipment housing - type of material and external colour:	Steel - RAL 7035 - Grey

Reasons for choice of design:
<p>The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. EE Ltd is the new operating company which used to be T Mobile and Orange.</p> <p>In keeping with the National Planning Policy Framework (NPPF). guidelines of using “high quality communications infrastructure”, the proposed design has been selected to minimise visual impact upon the street scene.</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 apertures , access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the apertures 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	
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## 5. Technical Justification

### Reason(s) why site required

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.

The site is required to provide enhanced coverage for EE Ltd, ESN and H3G LTE.

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

### Discounted Options

In accordance with the sequential approach outlined in the National Planning Policy Framework (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.

This sequential approach is outlined below:

- 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”.*

**D1 – Greenfield - North Shields RFC, Monks Wood, Preston, North Shields, North Tyneside, North of Tyne, England, NE30 2UB, NGR: E: 434834, N: 569735** – this option was explored for a greenfield site, however it was discounted from a radio perspective as it would only provide coverage to the north section of the search area. It would require an additional mast in another location to provide the target area with the desired level of coverage.

**D2 – Rooftop - Tynemouth Swimming Pool, Beach Road, Preston, North Shields, North Tyneside, North of Tyne, England, NE29 9PX, NGR: E: 434984, N: 569861** – this rooftop was discounted as the building has a low elevation which would not allow for a rooftop site to fulfil operational requirements.

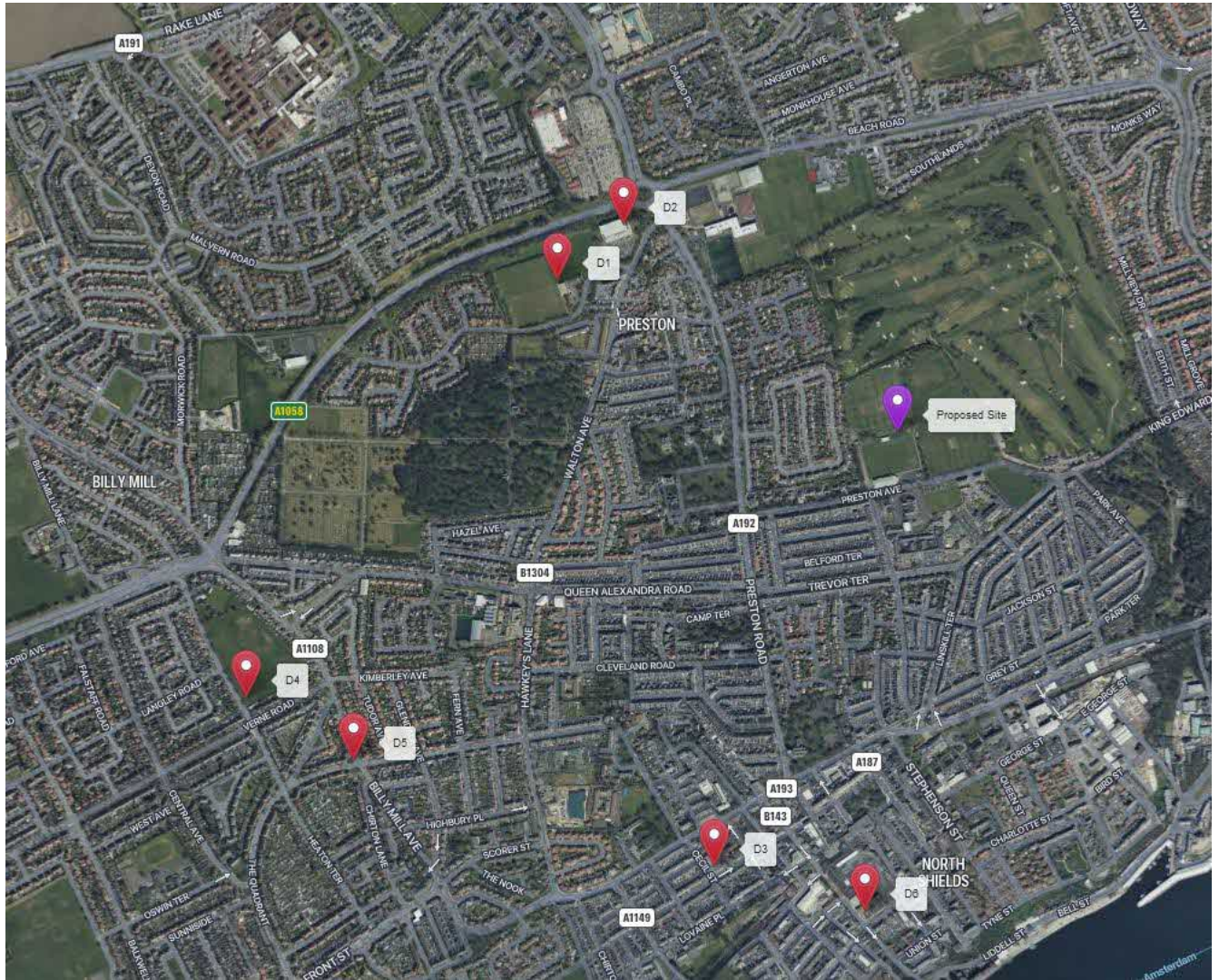
**D3 – Rooftop - Nelson Health Centre, Cecil Street, Chirton, North Shields, North Tyneside, North of Tyne, England, NE29 0DH, NGR: E: 435201, N: 568405** – this rooftop was discounted as it is too south of the target area and surrounded by buildings which are above the proposed building. The rooftop site would be unable to effectively provide coverage to the wider area as the coverage would be blocked by existing structures.

**D4 – Greenfield - Heaton Terrace, Chirton, New York, North Tyneside, North of Tyne, England, NE29 7LR, NGR: E: 434134, N: 568781** – a greenfield deployment at this location was discounted due to the highly residential nature of the surrounding area and lack of screening. The installation of a base station at this location would become visually intrusive to overlooking residential dwellings.

**D5 – Streetworks - 5, Delaval Avenue, Chirton, North Shields, North Tyneside, North of Tyne, England, NE29 7PX, NGR: E: 434379, N: 568642** – a large grass verge was explored for a potential streetworks deployment, however it was discounted from a planning perspective due to the multiple properties that are in close proximity to the options location. The properties would be overlooking the sites location, therefore the equipment would become severely visually intrusive.

**D6 – Rooftop - The Beacon, Bedford Street, Preston, North Shields, North Tyneside, North of Tyne, England, NE29 6QF, NGR: E: 435544, N: 568308** – this rooftop was discounted as it is too south of the target area and surrounded by buildings which are above the proposed building. The rooftop site would be unable to effectively provide coverage to the wider area as the coverage would be blocked by existing structures.

Figure 3 - An image to show the discounted sites.



## 7. Additional Relevant Information

### Background to the Proposal

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:

The NPF 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:

*“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 proposal is put forward for consideration.

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

*“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 compliant 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 Local Plan Policies.

**Contact Details**

Name: (Agent)

[Redacted]

Telephone:

[Redacted]

Operator:

EE Ltd & H3G

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N/A

Address:

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Email Address:

[Redacted]

Signed:

[Redacted]

Date:

13<sup>th</sup> November 2023

Position:

Planner

Company:

Dot Surveying Ltd

(on behalf of  
above operator)