

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	The Downsway	Site Address:	Land at The Downsway Sutton SM2 5RL
National Grid Reference:	E526382, N162995		
Site Ref Number:	CTIL_307907_00	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	<u>No</u>
If no explain why: No LPA register specific to mobile phone masts was found however, the LPA's planning records were examined accordingly.		
Were industry site databases checked for suitable sites by the operator:	<u>Yes</u>	No
If no explain why:		

Site Specific Pre-application consultation with local planning authority


Was there pre-application contact:	<u>Yes</u>
Date of pre-application contact:	22/01/2024
Name of contact:	N/A

¹ Macro or Micro

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Summary of outcome/Main issues raised:

Pre-application correspondence including a set of plans detailing the proposal was emailed to the LPA on 22 January 2024. In an email dated 22 January 2024, the LPA provided details of their pre-application consultation service. Considering the relevant pre-application consultation fee relating to small scale development and when balanced against the fee for the planning application, it was decided to progress the application and seek the LPA's formal determination.

Annual area wide information to planning authority

Has annual area wide information been provided?	NO
If no explain why:	
Summary issues raised:	
<p>Cornerstone's commercial relationship with Vodafone has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means they no longer have visibility of Vodafone's full update plans. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance.</p> <p>Cornerstone aims to engage and work with the planning department at the earliest opportunity from when they are instructed to deliver new infrastructure within a Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss wider rollout plans. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans, then please advise. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.</p>	

Community Consultation


Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:			
<p>The site and proposed works were assessed against the traffic light model prior to consultations being undertaken. An amber rating was assigned.</p> <p>Pre-application consultation correspondence was issued by email on 22 January 2024 to Belmont Ward Councillors, Cllrs Neil Garratt, David Hicks and Jane Pascoe, to the MP Paul Scully, to the Sutton Federation of Tenants and Residents Associations (SFTRA) and to Sutton Council Highways Department.</p>			

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The occupiers of nearby properties in The Downsway, The Gallop, Devonshire Road and The Highway were notified of the proposal by post. A total of 32 properties were contacted.

Summary of outcome/main issues raised (include copies of relevant correspondence):

10 responses were received from residents which included 7 objections and 3 responses requesting additional information.

The issues of concern raised include the following:

- Inappropriate location
- Scale of 20m mast will be overwhelming for the adjacent residential properties and an eyesore within the South Sutton Farm Estate designated an Area of Special Local Character
- Potential health, safety, and environmental impacts associated with the construction and operation of such a structure
- Impact on property values
- Impact on visual amenity
- The height and size of the mast and adjoining boxes are unsightly in an area of tree lined avenues that form part of the green belt
- Impact on wildlife given the location in the Sutton farm estate area of special local character
- There is a mast on the opposite corner in the grounds of the local Tennis Club
- Proposal would impede the vision of people leaving the tennis club car park
- It is an area of local historic interest
- Site you have selected is within the Sutton Farm ASLC (area of special local character) and a very high mast is totally out of character in this attractive tree-lined small park area
- Impact on highway safety due to reduced sight lines
- Noise pollution


The proposed location has been carefully selected following a thorough review of the area and considering several factors, not least the aesthetics of the site and planning considerations but other parameters that are explained in detail in part 5 of this report. The proposed site balances coverage requirements and environmental considerations with a host of other aspects. The proposal at this location would benefit from tree derived screening keeping the impact on the area to a minimum whilst significantly improving mobile connectivity to the benefit of the local community both socially and economically.

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The street scene has items of street furniture which includes lamp posts, bins, and street signage. Tall mature trees line the highway along several roads and are a prominent feature in the area. All these features albeit shorter than the proposed street furniture style must provide a context in which the installation will be viewed.

The scale of the equipment proposed is the least necessary for the efficient operation of the base station. The proposed location has been specifically selected to take advantage of the mature trees in the area which would provide a degree of visual mitigation for the installation reducing its visibility in street views and overall impact on the area. Views would be limited to the local area. Long views would be restricted by the dense tree cover in the area.

The design of the installation has been considered taking into consideration the resultant visual impact on the area and technical requirements. The proposal is specifically designed to fit into the street scene with minimum visual impact. The simple design of the installation comprising of a slender street furniture pole with cabinets like those commonly found in the street scene, painted green would allow the installation to assimilate with its surrounds with limited impact. It is considered the visual impact of the proposal would not be significant and when balanced against the benefits of this essential digital infrastructure and lack of suitable alternative sites in the area, would be within acceptable limits.

The proposed site is in an Area of Special Local Character (ASLC). As noted above the visual impact of the installation would be moderate given the screening that would be afforded by surrounding trees and the modest scale of the proposed development. Therefore, the impact on the character and appearance of the area would not be significantly detrimental. The proposal respects local context and would not impact those elements which contribute to the ASLC's special character and appearance.

The proposed site is not in a Green Belt.

The proposed site is a grass verge at a roadside location. The proposal would not have any impact on wildlife.

There is reasonable separation distance between the proposed site and nearby houses. Most of the nearby properties would not have direct views of the installation. In very few cases where the installation would be visible, views would be restricted by the intervening trees. Therefore, it is considered the impact on residential amenity would be limited.


The proposed site is setback from the highway. The proposal would not impact highway safety.

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The noise from the cabinets would be at low levels and would not be heard from nearby properties.

The proposed site is required to improve 4G service provision and to provide new 5G coverage to this area on the Vodafone network. Whilst the nearby mast in the grounds of the Sutton Tennis and Squash Club nearby is operated by Vodafone, this facility cannot be upgraded to support 5G technology. The existing structure does not have the capacity to accommodate the additional 5G equipment required to address the technical requirement. Therefore, it needs to be replaced with a bulkier and wider structure with the structural capacity to accommodate the required antennas incorporating the necessary antenna separation distances. The existing building, however, does not have the structural capability to support the bulk and weight of the additional 5G apparatus required as well as the existing technologies. Consequently, a replacement site is needed to deliver new 5G coverage in this area. The proposed site would replace the existing installation at the Sutton Tennis & Squash Club.

In relation to health and safety, an ICNIRP declaration statement is provided with the application which certifies that the proposed site shall be operated to be in full compliance with the requirements of the radio frequency (RF) guideline limits of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) for public exposure and UK legislation.

School/College

Location of site in relation to school/college (include name of school/college):

No schools were identified nearby.

Outline of consultation carried out with school/college (include evidence of consultation):

N/A


Summary of outcome/main issues raised (include copies of main correspondence):

N/A

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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?	Yes	<u>No</u>
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	<u>No</u>
Details of response: N/A		


Developer's Notice

Copy of Developer's Notice enclosed?	<u>Yes</u>	No
Date served:	07 February 2024	

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3. Proposed Development

The proposed site:

The proposed site is a grass verge on a landscaped area on the southern side of The Downsway at the junction with The Highway. Lamp posts and tall mature trees are a common feature of the street scene. Other items of street furniture i.e. street signage, bins, bollards and a flagpole style mast are evident in the area. The proposed installation would be viewed in the context of these vertical features. The surrounding area predominately consists of residential properties. The site is not in a conservation area or near listed buildings.




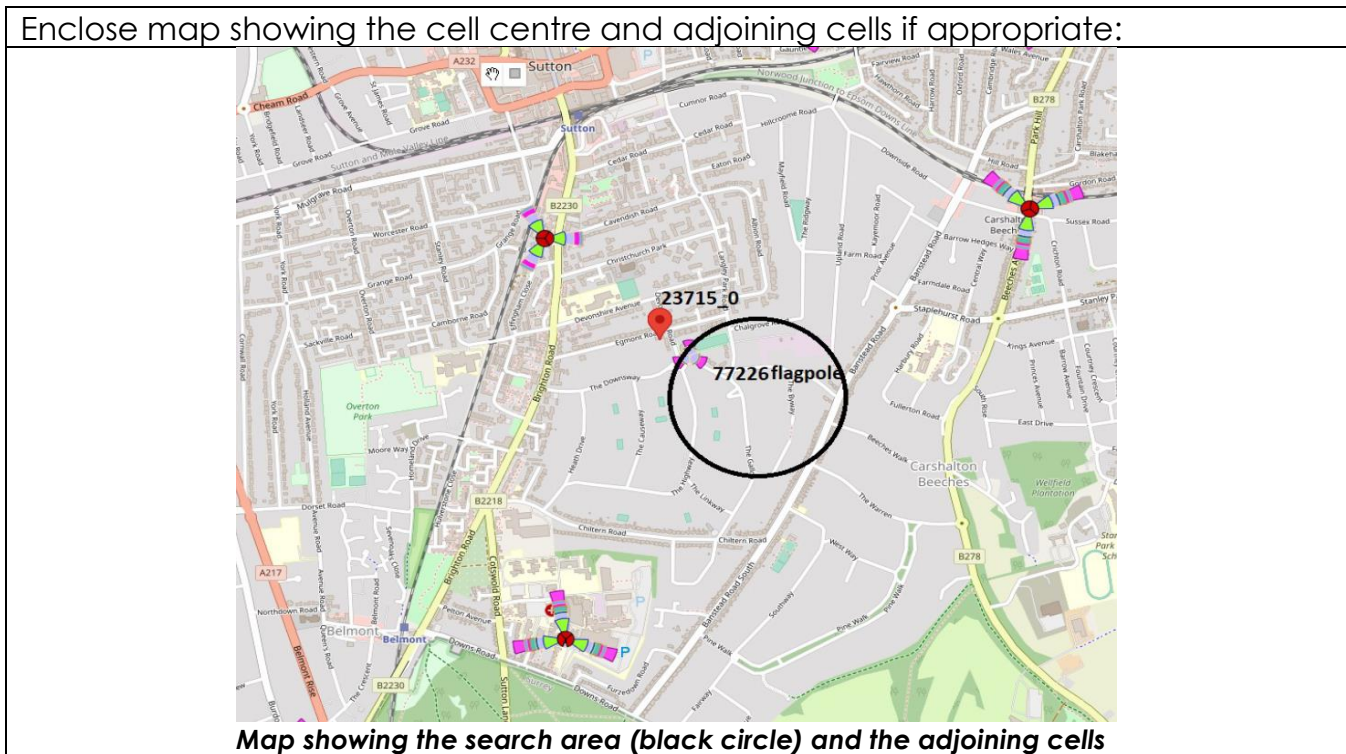
Proposed site viewed from the junction of The Downsway and Devonshire Rd

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Type of Structure (e.g. tower, mast, etc):	
Description:	
The proposal comprises the installation of a 20m high monopole supporting 6no. antennas, 1no. 300mm dish along with 2no. equipment cabinets, 1no. meter cabinet and development ancillary thereto.	
Overall Height:	20 metres
Height of existing building (where applicable):	N/A
Equipment Housing:	
Length:	1.900 metres
Width:	0.600 metres
Height:	1.722 metres
Equipment Housing:	
Length:	0.823 metres
Width:	0.600 metres
Height:	1.722 metres
Equipment Housing:	
Length:	0.655 metres
Width:	0.264 metres
Height:	1.015 metres

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<i>Materials (as applicable):</i>	
Tower/mast etc – type of material and external colour:	Galvanised steel painted green
Equipment housing – type of material and external colour:	Galvanised steel painted green

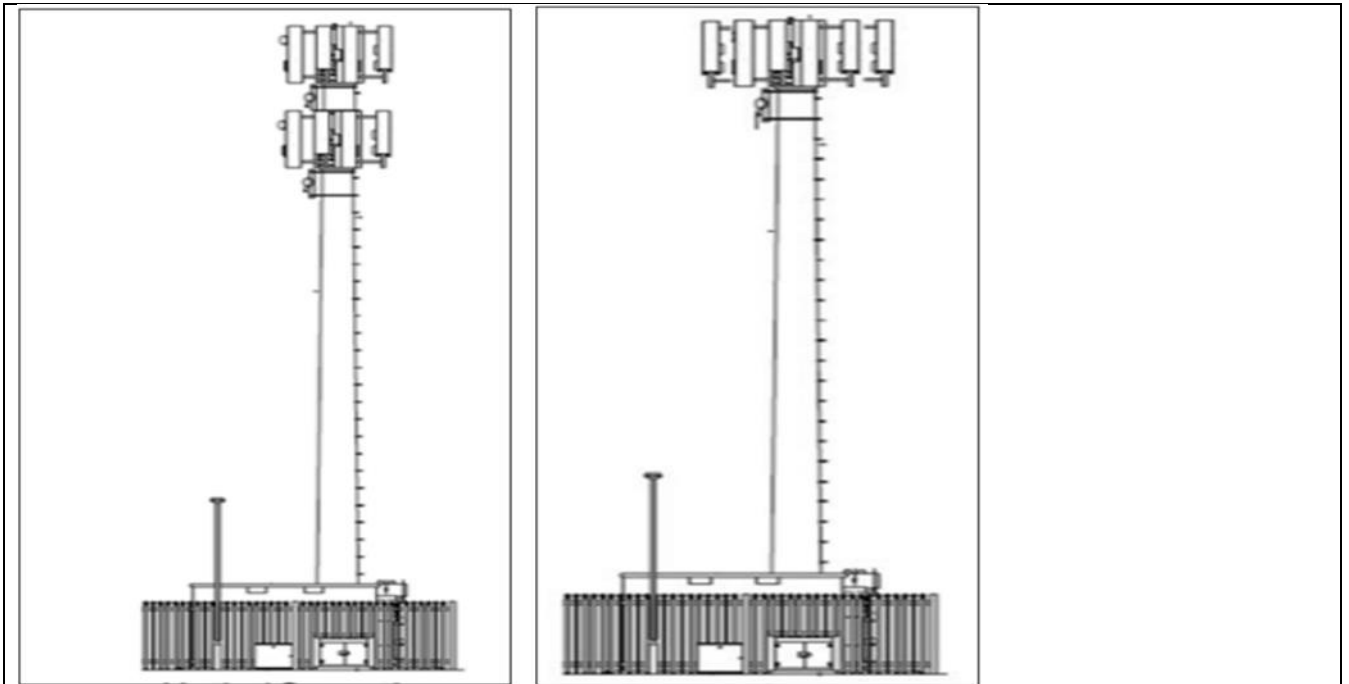
<p>Reasons for choice of design, making reference to pre-application responses:</p> <p>The installation of telecommunications infrastructure requires a balanced approach considering the technical needs and constraints of the proposed site and the potential impact of the development in amenity terms. The proposed design has been determined considering the site location and surrounding context, the technical requirements of the site and impact on visual amenity.</p> <p>By way of background information, it is useful to highlight that the design of the base station has three main elements. These include the cabinets which contain the equipment used to generate the radio signal, the supporting structure that holds the antennas in the air and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements critical to the operation of the base station, are the dishes which connect the site to the rest of the network, the power source, the feeder cables that link the equipment housing to the antennas and other support structures such as foundations and fixings, often referred to in general terms as “development ancillary to” the base station.</p> <p>Efforts have been made to minimise the visual effect of the development by ensuring the design is of a high standard and is the least visually intrusive. The number and scale of the proposed equipment is the least required for the efficient operation of the site. The slim and unfussy design of the support structure has been chosen to take account of the location along a highway. The monopole proposed is the most appropriate and least visually impactful design compatible with this roadside location available to the Applicant. The monopole has a compact profile with a stacked antenna arrangement at the top designed to achieve a slender appearance. The proposed design is also the slimmest solution available to the Applicant with the structural capacity to support the required apparatus. Although other industrial style monopoles like those shown in the images below are technically superior, these designs are not considered appropriate for roadside locations as they are evidently more visually intrusive and cannot be safely accommodated along the roadside due to their large scale.</p>

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Examples of alternative support structures

Another design element to consider critical to the base station is the height of the support structure. The height of the monopole is crucial to allow the antennas to unrestrictedly emit the radio signal to the target area. Therefore, specific antenna orientations and heights, determined by radio planners must be achieved. Surrounding features such as trees and buildings referred to as “clutter” that could potentially block the radio signal must be cleared for all antennas (including the bottom stack of antennas in this case) to provide clear lines of sight for signals. This allows the mast to function effectively and to deliver the maximum coverage to the intended area which in turn means fewer mast sites are required in any given area. As noted previously, 5G antennas are more susceptible to the shadowing effect of surrounding clutter therefore their placement is even more critical to delivering this technology. The panoramic photographs attached to the application show the dense tree cover in the area which the antennas need to over sail to function effectively. These photographs further demonstrate the need for the proposed height which is the minimum necessary to attain the required coverage levels. Furthermore, all UK mobile phone base stations are designed to comply with the stringent International Commission on Non-Ionizing Radiation Protection (ICNIRP) general public exposure guidelines recommended by the UK government and the European Union and formally backed by the World Health Organisation. The proposed monopole needs to achieve a specific height to comply with ICNIRP guidelines. The above factors have influenced the height of the proposed monopole.

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The proposed dish measuring 300mm is the least size required to link the installation to the operator's network. The dish is positioned at the lowest height necessary to achieve the line of sight needed to connect to the rest of the network.

The cabinets are similar in form to roadside cabinets commonly found in the street throughout the UK. It should be recognised that seen on their own merit as single development, the cabinets do not normally require a formal determination of the Council and are permitted development.

The proposed monopole and cabinets would be painted green to allow installation to assimilate with its surrounds.

In summary, the proposed street furniture style design is considered appropriate for this roadside location with other vertical elements. It is considered the design strikes a good balance between minimising visual impact and meeting the technical need.

Health and Safety - including ICNIRP compliance

The proposal complies fully with ICNIRP guidelines and declaration of compliance is provided with the application.

4. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

Reason(s) why site required e.g. coverage, upgrade, capacity


Vodafone currently has an existing mast camouflaged as a flagpole on the roof of the club building at the Sutton Tennis and Squash Club, 19 Devonshire Rd, Sutton SM2 5HH currently providing coverage to this area. This pole mounted design does not have the capacity to accommodate any additional equipment and a replacement mast of greater bulk and height (necessary to accommodate all the required apparatus for 5G) cannot be structurally supported by the building due to its small scale. To this end, a replacement site is required to deliver 5G coverage to this area.

The proposed site is required to improve 4G service provision and to provide new 5G coverage in this area on the Vodafone network.

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The benefits of reliable mobile connectivity and 5G provision are widely recognised. The government recognises the importance of advanced communications infrastructure, such as the proposed development, as a key driver of economic growth. It considers digital connectivity as an essential service that should be readily accessible to everyone. In the latest report by the Department for Science, Innovation and Technology “UK Wireless Infrastructure Strategy” April 2023, in the foreword the Secretary of State states that *“Connectivity has brought benefits for British households and British business, boosting growth, productivity, and opportunity for all. And change shows no sign of stopping. In fact, we find ourselves on the brink of a new revolution which promises to transform the world once more.”* She further states that *“5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone 5G will drive growth in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. 5G can improve our public services, too, in everything from education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis.”* *“This is an incredible opportunity; widespread adoption of 5G could see £159bn in productivity benefits by 2035. And it is exactly the kind of opportunity which the Department for Science, Innovation and Technology was created to seize. It is my personal mission as the Department’s first Secretary of State to put Britain right at the forefront of scientific and technological progress. By bringing together world-class research and a dynamic business ecosystem, we can harness enterprise and innovation to grow the economy, driving forward the delivery of one of the Prime Minister’s five priorities.”*

The report sets a bold ambition for the UK to have nationwide coverage of standalone 5G to all populated areas by 2030. *“Given the substantial potential that 5G offers for businesses and public service delivery, we are setting out a bold vision for the next generation of our national networks to galvanise investment across our economy. We want to move beyond the basic 5G that is being deployed now over 4G networks to build higher quality, standalone 5G networks that do not rely on older infrastructure. We also want to extend 5G coverage well beyond cities and towns to all populated areas of the UK, including rural villages and communities.”*


In the same report, in the forward by the minister of State, she states that *“delivering world-class digital infrastructure to all Britons is a fundamental mission of this government - and our efforts to build it the modern equivalent in scale and ambition to the Victorians’ construction of the railways. Our plan is for every corner of our country to get lightning fast connectivity, not only to give people real choices about where to live and work today but so they will not be left out of future technological revolutions because of poor infrastructure.”* *“Although it is impossible accurately to*

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predict when large scale demand for 5G and other forms of advanced wireless connectivity will emerge and how widespread that will be, mobile data provided over public mobile networks has grown 40% per year on average over the last decade and we expect to see continued growth in data traffic over the next decade. Ofcom's Mobile Market Review suggests data growth could range from a 25% increase per year to 2030 to 55% increase per year to 2030."

The growth of mobile usage and increase in demand for mobile data is further highlighted in Ofcom's report "Mobile networks and spectrum - Meeting future demand for mobile data (9 February 2022)." According to this report "In recent years we have seen an average 40% year-on-year growth in demand for mobile services provided over public mobile networks. This growth has been driven by the development of new applications and enabled by evolving technologies and consequent changes in consumer behaviour" (paragraph 2.6). The demand for mobile data is expected to "continue to grow as we rely on it ever more to carry out daily activities like shopping, gaming, banking and watching movies. Demand is likely to be stimulated further as new and more sophisticated applications are developed, and by the development of machine-to-machine and machine-to-device applications" (paragraph 2.7).

In paragraph 1.1 of "Ofcom's future approach to mobile markets and spectrum" report, it is stated that "We expect demand for mobile data to continue to grow as greater use is made of data-hungry services and as new technologies enable new uses." "Network quality is likely to be of growing importance to customers" (paragraph 1.2). Reliable and advanced infrastructure like the proposed development is required to support the increasing demand on the networks and to support the latest 5G technology required to deliver advanced mobile capabilities.

Below are examples of practical applications of 5G connectivity in everyday life which further emphasizes the importance of this technology.

Education


The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere. 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

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Health

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

Considering the importance of 5G technology and the remarkably high demand for mobile services, it is crucial for mobile operators to provide and maintain a reliable, mobile digital infrastructure network that provides the necessary coverage and capacity to allow reliable mobile connectivity and meet the ever increasing demand for services by users. The proposed essential infrastructure will contribute to meeting this demand and it will maintain and improve access to the very latest technologies for residents, businesses and visitors in this area.


The above reports emphasise the importance of advanced digital infrastructure such as the proposed development and support the expansion of 5G technology which can handle ever larger data requirements and significantly improve network efficiency. The proposal which supports 5G technology is precisely the type of high-speed digital infrastructure the government is seeking to promote to achieve its ambition of delivering world-class digital infrastructure to the whole of the UK, essential for sustainable economic growth.

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5. Site Selection Process

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

The location of any base station is critical to addressing the technical requirement in any area. Site selection is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location. Several factors are considered when considering sites for a base station such as the relationship between the location of the proposed site and existing sites within the network due to the unique and specific gap in coverage that must be filled to ensure the site fits into the established cellular pattern especially when seeking to replicate coverage from an existing site like in this case as many locations will not be able to fit precisely in the identified coverage hole. For example, in this case, siting too far from the existing rooftop installation at Sutton Tennis club would affect the existing cellular pattern which may create coverage holes in the network resulting in dropped calls, poor coverage, poor handovers, poor call set up and 'Not Spots'. This would consequently create the need for additional mast sites whilst failing to address the current technical requirement. It is therefore important that the new site is located close to the existing rooftop installation to retain the existing cellular pattern for operational efficiency eliminating the need for additional infill sites and to achieve a reliable advanced network capable of delivering the latest 5G technology necessary to improve mobile connectivity for customers in this area.


Other factors to consider in the site selection process are whether the site offers the flexibility to achieve the necessary antenna orientations and heights required to effectively provide coverage to the desired areas; the presence of natural or manmade features (referred to as clutter) at, or near to, the location that might affect the efficiency of the antennas; planning considerations (consideration to what can be feasibly achieved with a design that will be visually appropriate), the ability for the site to be built and maintained (sufficient space, avoiding underground services, ensuring ICNIRP requirements are met, visibility splays, getting power to the site just to name a few), the topography of the area (for example, siting on a hill where coverage is required in a dip can be prohibitive).

Furthermore, because mobile base stations are relatively low powered devices, they only cover a limited geographical area (referred to as a cell) and therefore they need to be sited in the identified area of need or coverage deficiency ideally within the defined search area to effectively address the technical requirement. They also need to be sited close to where people wish to use their mobile phones, where people live and work to ensure good connectivity. In heavily built-up areas, for example, a small

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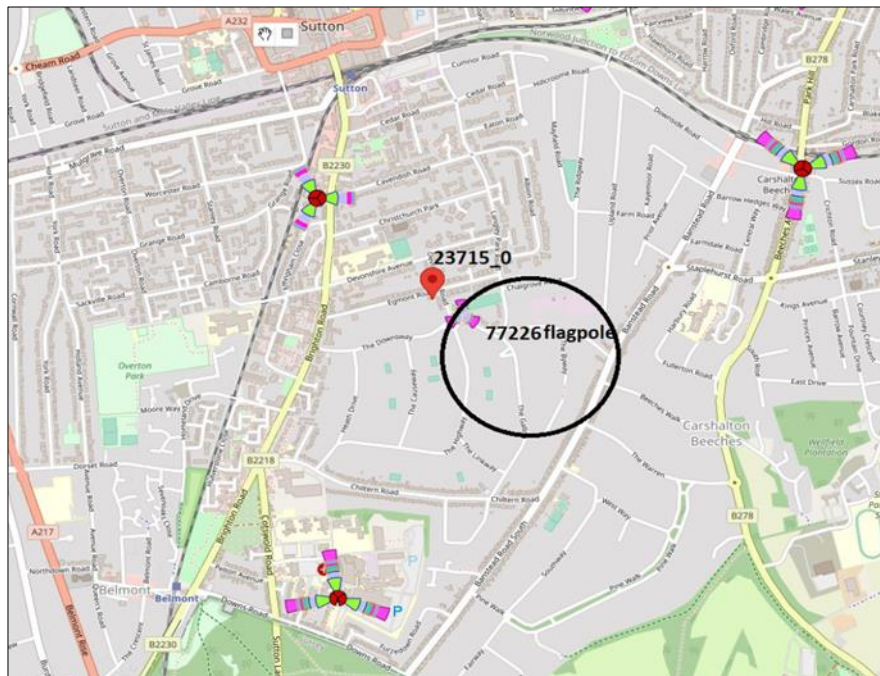
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base station might cover only a few hundred metres. Again, by placing sites in areas where they are needed, the overall number of sites in any given area is minimised as fewer sites are required to provide infill coverage.

A comprehensive review of the area has been undertaken to identify possible siting options. Potential alternatives to the proposed site have been assessed considering the factors identified above. The aim of site identification is to find the most technically efficient site, which has the minimum impact on visual amenity and the environment.

The map below shows the search area (marked with a black circle) in which the replacement site needs to be located to maintain the existing coverage pattern and to address the coverage requirement identified in this area.



Map showing the search area (black circle)


Mast or Site sharing

Cornerstone makes every effort to use existing mast sites where possible to keep the overall environmental impact of the deployment of this infrastructure to a minimum. The search area was examined for existing mast sites upon which the required apparatus could be installed however, no suitable existing masts or sites were found in the area to replace the existing telecoms site at the Sutton Tennis and Squash Club on Devonshire Road. As previously noted, the existing facility at the Tennis Club cannot be upgraded. There is no comparable solution that can accommodate the existing

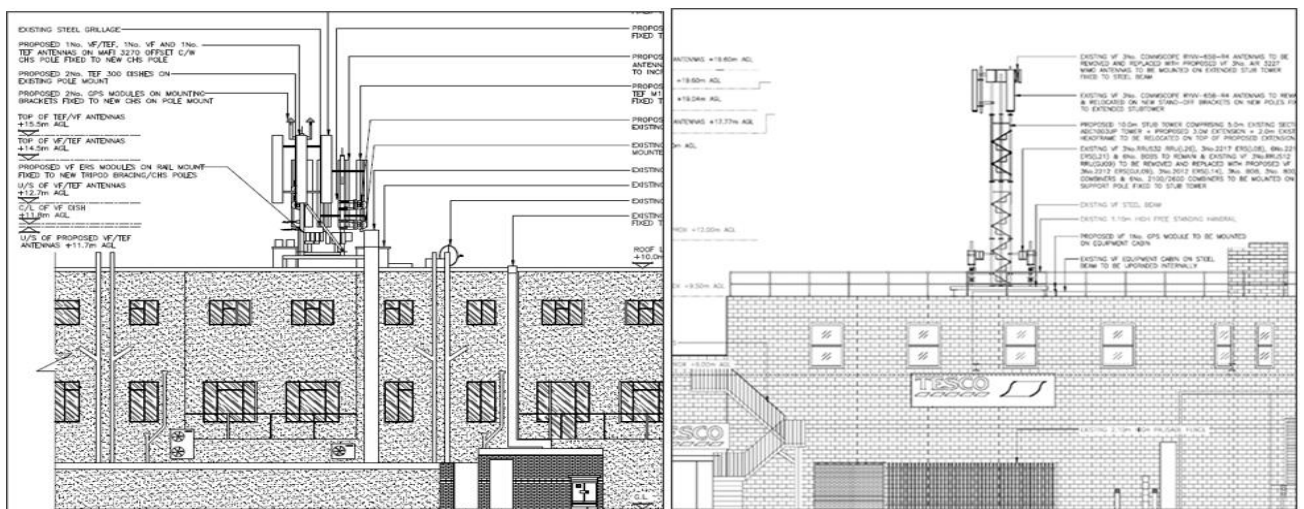
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technologies plus the new 5G antennas within the same pole mounted design. As previously explained, the site would require significant redevelopment. A tower of substantial height and width or a bulkier pole mounted installation like the structures shown in the images below would be required to allow the antennas to over sail obstructions in the surrounding area to provide a clear line of sight to deliver the required coverage to the target area. The rooftop/building would not be able to structurally support a structure of this scale and weight due to the small scale of the building. Additionally, these structures would be significantly prominent in the street scene.



5G compatible rooftop design solutions


No suitable buildings or structures are available in the search area that can be utilised for the installation. The search area is dominated by residential properties with barely any commercial properties. The buildings are generally low in height. None have been identified that offer sufficient height to deliver the required 5G coverage levels to the intended area. As no viable options could be found in the search area that would enable the required apparatus to be sited upon existing telecommunications facilities, buildings or structures, a ground based mast is proposed at a roadside location that is separated from houses and takes advantage of screening from existing trees to mitigate visual impact.

The proposed site balances the coverage requirements with a host of other technical aspects as noted above, including planning considerations. It is considered the most viable option available in the area that would achieve the technical objective with minimum impact on the area.

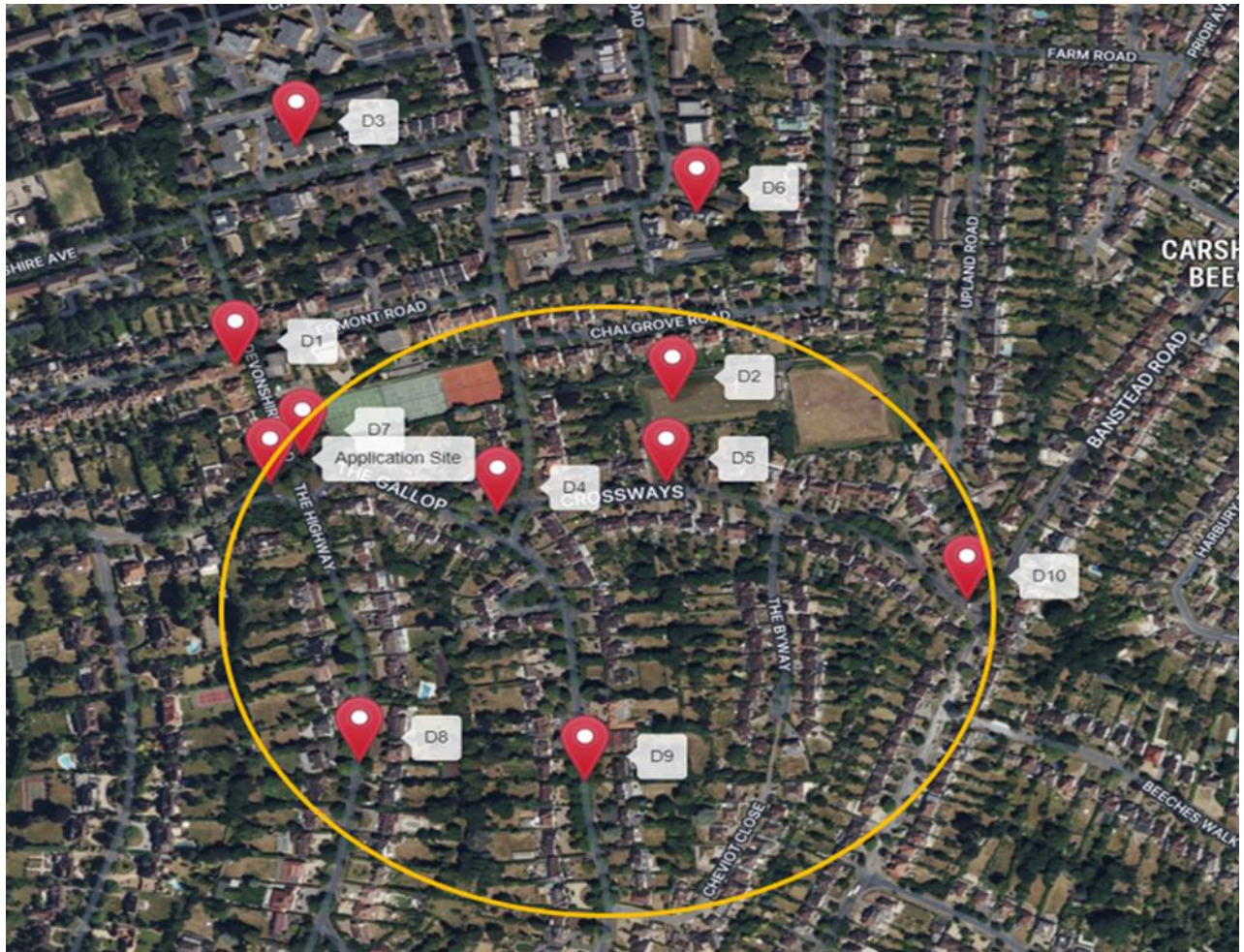
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The map below shows the alternative site options considered (shown by red markers) in the area and subsequently discounted.



Map showing alternative site options discounted.


Below is the list of alternative sites considered in the area with reasons why they were discounted.

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
D1- Streetworks	Street furniture on Devonshire Road, Sutton, SM2 5FX	526355, 163098	A streetworks monopole along Devonshire Road has been discounted as there is insufficient space to accommodate a telecommunications installation

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			due to the narrow nature of the pavement.
D2- Greenfield	Greenfield site on Langley Park Reservoir, Chalgrove Road, Carshalton, Beeches, Sutton, SM2 5JT	526677, 163075	A ground mast was considered on the land around the reservoir. However, this area has limited tree screening. It was determined that a mast here which would be larger and wider than the structure proposed at The Downsway, would have a greater impact on amenities.
D3- Rooftop	Rooftop at 13-28 Lauren Manor, Devonshire Road, London Borough of Sutton, London, SM2 5FX	526395, 163291	This residential complex has been discounted as the blocks are too low to provide the required coverage to the area. In addition, the buildings are located too far north of the search area to provide the optimal coverage to the target area.
D4- Streetworks	Street Furniture on Crossways, Carshalton, Sutton, SM2 5HG	526550, 162974	This site is similar in character to the proposed location in The Downsway. However, this location has less tree cover. Therefore, the installation here would appear more prominent having a greater impact on amenities and the surrounding area.
D5- Streetworks	Street Furniture on Crossways, Carshalton, Sutton, SM2 5LB	526673, 163003	The open nature of this location would result in a more visually intrusive structure than the installation at the proposed location which benefits from better screening from dense tree cover.
D6 - Rooftop	Rooftop at Sutton Heights, 73-99, Albion Road, Carshalton Beeches, London Borough of Sutton, SM2 5TD	526690, 163241	This residential complex has been discounted as the blocks are too low to provide the required coverage to the area. Additionally, the buildings are located far north of the search area to provide the optimal coverage to the target area.

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D7 – Greenfield	Greenfield at Sutton Tennis & Squash Club, 19 Devonshire Rd, Sutton SM2 5HH	526406, 163022	Vodafone currently has an existing mast camouflaged as a flagpole on the roof of the building. The Operators does not have a comparable solution that can accommodate the existing technologies plus the new 5G antennas within the same pole mounted design. The site would require significant redevelopment. A tower of substantial height and bulk would be required to allow the antennas to over sail obstructions in the surrounding area to provide a clear line of sight to deliver the required coverage to the target area. The rooftop/building would not be able to structurally support a structure of this scale and weight due to the small scale of the building. Additionally, a structure of this nature would be significantly prominent in the street scene.
D8 – Streetworks	Street Furniture on The Highways, Carshalton, Sutton, SM2 5QS	526454, 162753	A streetworks monopole within this residential area has been discounted as there is insufficient space to accommodate a telecommunications installation given the narrow pavements. In addition, a streetworks monopole here would benefit from less tree-derived screening and so would have greater impact on visual amenity when compared to the proposed site which benefits from significant tree cover.
D9- Streetworks	Street Furniture on The Gallop, Carshalton, Sutton, SM2 5SA	526620, 162740	A streetworks monopole within this residential area has been discounted as there is insufficient space to accommodate a telecommunications installation

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			given the narrow pavements. In addition, a streetworks monopole here would benefit from less tree-derived screening and so would have greater impact on visual amenity when compared to the proposed site which benefits from significant tree cover.
D10-Streetworks	Street Furniture on the Junction of Crossway and Banstead Road, Calshalton, Sutton	526898, 162905	A streetworks monopole within this residential area has been discounted as it would not provide enough space to accommodate a telecommunications installation given the narrow pavements. Furthermore, a streetworks monopole here would have less tree-derived screening and so would have a greater impact on amenities when compared to the proposed site which benefits from significant tree cover.

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


Land use planning designations:

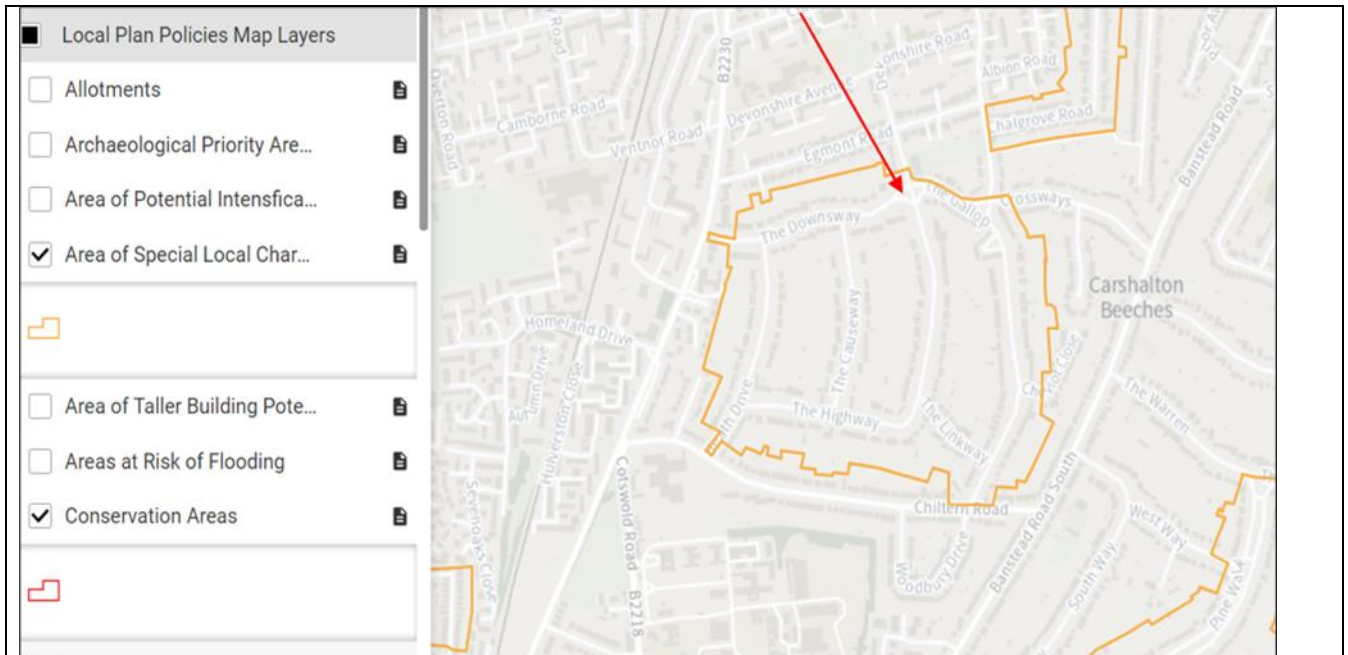
The map extract below taken from the Sutton Local Plan Policies Map confirms the proposed site is in an Area of Special Local Character. It is not in a conservation area. There are no land use designations that would affect permitted development rights.

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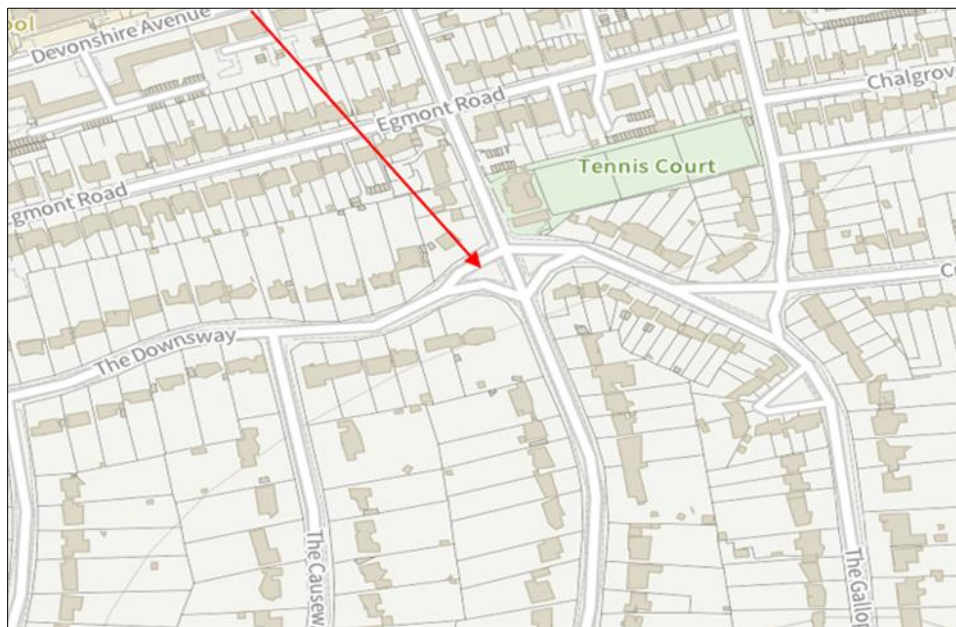
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Proposed site (shown by a red arrow) in relation to landuse designations in the area. Source: Sutton Local Plan Policies Map

The map extract below from Historic England 'Search the List Map Search' shows there are no listed buildings near the subject site.




Proposed site (shown by the red arrow) and the surrounding environment. Source Historic England -Search the List Map Search

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

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PLANNING POLICY

National Planning Policy

National Planning Policy Framework (2023) (NPPF)

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states *"The purpose of the planning system is to contribute to the achievement of sustainable development"*, and in paragraph 10 that *"at the heart of the Framework is a presumption in favour of sustainable development"*. In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

*"a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

The proposed development will significantly improve mobile connectivity benefiting users socially and contributing to economic growth as previously highlighted.

The NPPF directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:


*"b) infrastructure for transport, **telecommunications** (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"*

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Leading on from this, paragraph 118 states that *“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”*.

While supported, the number of base stations is encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 119 states that *“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.”*

The proposed site is needed to provide new 5G coverage, to improve existing services on the Vodafone network. There are no suitable existing telecommunications installations in the area which can be utilised for the installation as explained in part 5. The proposed installation would replace the nearby mast at the Sutton Tennis and Squash club and it would support multi technologies limiting the number of mast sites in this area in line with the above guidance.

It should be noted that paragraph 122 states that *“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.”*

The proposed development has been designed to be fully compliant with the precautionary ICNIRP guidelines.

The proposal is fully compliant with the guidance set out in the National Planning Policy Framework.

London Plan 2021


In paragraph 11.1.45, the Mayor recognises the need to invest in high quality digital infrastructure to meet increasing demand as *“business activities and people’s lifestyles become more dependent on faster broadband.”* In paragraph 9.6.1, it is noted that the *“provision of digital infrastructure is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance.”*

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Policy SI 6 'Digital connectivity infrastructure' is specifically aimed at supporting the development of digital infrastructure to ensure London's global competitiveness. It states:

A To ensure London's global competitiveness now and in the future, development proposals should:

- 1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users*
- 2) meet expected demand for mobile connectivity generated by the development*
- 3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation*
- 4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.*

B Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access.

The London Plan generally supports the provision of high quality digital infrastructure such as the proposed development. The economic and social benefits of the proposal resulting from enhanced mobile connectivity and improvements in the overall quality of the network have been previously highlighted. It is this essential advanced digital infrastructure that the Mayor is seeking to promote to ensure London's global competitiveness. The proposal is fully supported by the London Plan.

Development Plan Policy

The Sutton Local Plan 2018 sets out the planning strategy and policies for the borough until 2031. Policy 23 sets out the guidance relating to telecommunications development.


Policy 23: Telecommunications

All telecommunications development should be sited and designed in such a way that it does not adversely affect the appearance of the surrounding area. The council will only grant planning permission of telecommunications equipment where:

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a The siting is not intrusive in the street scene and the design is of a height, scale and appearance which does not unduly detract from the character of the area or unacceptably harms the amenities of occupiers of neighbouring sites unless there is a specific need which outweighs the harm.

The proposed site is a grass verge on the southern side of The Downsway. The proposed site has been specifically selected to take advantage of the dense tree cover in the area which would provide a good level of screening for the installation ensuring it does not appear intrusive in the street scene. The height of the proposed monopole is the minimum required for operational efficiency and the scale of development is modest. The slender appearance of the monopole, the simple form of the cabinets and inconspicuous colour of the apparatus would ensure the installation assimilates with the street scene with minimum impact and does not unduly detract from the character of the area.


The installation would be visible from The Downsway, The Gallop, Devonshire Road, and The Highway. As shown in the photos below taken from google maps, it would be viewed together with other vertical features in the street scene including several tree trunks. The development would be well screened in street views as shown in the photos below particularly when the trees are in leaf. Even in winter months when the trees are bare, visual impacts would be mitigated by the verticality of the trees. The pole would be thin when compared to the trunks and wide canopies of some of the nearby trees. The modest scale of the development together with the significant visual mitigation that would be provided by the trees would ensure the installation does not appear unduly prominent in the street scene. Long views would be limited by the dense tree cover in the area. The visual impact of the development would be moderate.

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West view of the subject site (shown by a red arrow) from The Downsway




East view of the subject site (shown by a red arrow) from The Gallop

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Northeast view of the subject site (shown by a red arrow) from Devonshire Road




Southeast view of the subject site (shown by a red arrow) from The Highway

The nearest residential property is located approximately 28 metres to the north. This property does not have any windows facing directly onto the site as shown in the image below. Generally views from properties to the north of the site would be severely restricted by the existing boundary fence and existing trees. It is not

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considered that the proposal would have a significant impact on the amenities of these properties given the separation distance from the site and screening afforded by the intervening existing boundary wall, bushes, and trees.



**South view of the application site (shown by a red arrow) from The Downsway.
Source: Google Maps**

In summary, the visual impact of the development would be limited and within acceptable limits. The proposal would not appear at odds with the character of the area when viewed in conjunction with the existing vertical features in the street scene. It would not have a detrimental impact on visual and residential amenities considering the modest scale of the development and the level of screening provided by existing mature trees. It is considered that the resultant visual impact which would be moderate would be outweighed by the need to site the proposed apparatus in the proposed location considering the significant public benefits of implementing the advanced digital infrastructure proposed.


b All alternative sites which fulfil the functional requirements of the equipment have been assessed.

No suitable alternative sites have been found in the area that meet the Operator's technical requirements. The site selection process is explained in detailed in part 5 of the report.

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c It has been demonstrated that the use of existing facilities or sharing equipment with other operators has been considered.

It has been explained in part 5 that the use of existing facilities or sharing equipment with other operators has been considered but no suitable sites could be found in the area.

d Consideration has been given to the need to cater for the future growing demand for network development, including that of other operators.

The proposed installation is modern infrastructure compatible with multiple technologies and can be adopted to cater for future technology advancements.

e Every effort has been made to minimise the visual impact of the proposal.

As previously explained in part 3 of this report, every effort has been made to minimise visual impact through siting and design. The siting in an area with trees offers the opportunity to screen the installation reducing its visual effect as demonstrated above. The design merits of the proposal have been explained in part 3 and it is considered the design achieves a good balance between technical considerations and minimising visual impact.

f The applicant has demonstrated that the development will operate within the International Commission on Non-Ionizing Radiation Protection guidelines for public exposure.

The proposal complies fully with ICNIRP guidelines and declaration of compliance is provided with the application.

The proposal is fully compliant with the relevant local plan policy.

Summary and Conclusion

The proposal has been designed and sited to keep the impact on the area to a minimum whilst ensuring that the technical objective is achieved. The impact on visual amenity would be limited considering the modest scale of the development and screening afforded by nearby trees.

The need for the development has been highlighted. The proposed installation would enhance mobile connectivity in this area providing new 5G services. The social and economic benefits of advanced communications infrastructure are widely known, and these have been highlighted in this report.


The proposed site was selected as the most viable option that would sufficiently address the technical requirement with minimum impact on the area. There are no suitable alternative sites in the area with greater technical and planning merit.

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It has been demonstrated that the proposal would have a limited visual impact on the area. It is considered that this would be outweighed by the need to site the proposal in the proposed location considering the lack of viable alternative sites and the public benefits of the development resulting from enhanced mobile connectivity.

The proposal is fully compliant with ICNIRP guidelines and declaration of compliance is provided with the application.

The development complies with the relevant local plan policies and national planning guidance as outlined in this report.


Confirmation that submitted drawings have been checked for accuracy

Name: (Agent)	Fiona Kadama	Telephone:	01932 411011
Company:	Cornerstone		
Company Address:	C/o Agent - Waldon Telecom Rosemount House, Rosemount Avenue, West Byfleet, Surrey, KT14 6LB	Email Address:	fiona.kadama@waldontelecom.com
Signed:	<i>f. kadama</i>	Date:	12/02/2024
Position:	Planner	(on behalf of Cornerstone)	Waldon Telecom Ltd

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