

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

1. Site Details

Site Name:	Pigeon House Street Works	Site Address:	Whitefield Drive, Kirkby, Knowsley, L32 4SY
NGR:	E: 339988 N: 398514		
Site Ref Number:	KSY17831	Site Type:	Proposed 5G telecoms installation: H3G Phase 8 20m high street pole c/w wrap-around cabinet 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:	7 th July 2021	
Name of contact:	Email issue to the Local Planning Department.	

Summary of outcome/Main issues raised:

CK Hutchison Networks (UK) Ltd 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 27th August 2020.

School/College

Location of site in relation to school/college:

Having conducted a review of the area, Westvale Community Primary School is approximately 220 metres from our proposed site.

Outline of consultation carried out with school/college:

Westvale Community Primary School were issued a copy of the pre-application enquiry – site detail sheet.

Summary of outcome/Main issues raised:

To the best of our knowledge no communication was received from Westvale Community Primary School.

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?

N/A

No

Details of response:

N/A

Developer's Notice

Copy of Developer's Notice enclosed?

Yes

Date served:

21st July 2021

3. Proposed Development

The proposed site:

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.

The technical details of this proposal are illustrated within application design drawings as attached.

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.

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.

Figure 1 - Site Photograph's



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 Knowsley Local Plan Core Strategy 2016.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2019) (NPPF)

The new National Planning Policy Framework came into force in July 2018 replacing the guidance published in March 2012. The guidance has subsequently been updated in February 2019. The 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."

For **decision-taking** (paragraph 11) this means:

"c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Further to this, paragraph 38 states that "*Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.*"

The proposed development will enable the provision of enhanced mobile communications services to the surrounding area from a single monopole, providing improved services for 4G and 5G technologies, bringing about substantial public benefit both socially as well as the allowing for certain businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, particularly important in the current climate, and the creation of the 'virtual office', thus reducing the need to travel and contributing to the sustainability agenda.

Government advice in recent years has been to promote and encourage communications services. Within his presentation to Parliament in July 2015 of the Government report "Fixing the Foundations: Creating a more prosperous nation" the Chancellor of the Exchequer reiterated the importance of a high-speed digital communication infrastructure. *"7.1 Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home."*

By reducing regulatory red tape and barriers to investment, the government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published in March, of near-universal 4G and ultrafast broadband coverage."

The NPPF (2019) 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)"*

Leading on from this, paragraph 112 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"*.

It should be noted that paragraph 116 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 proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory

Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, Telecommunications Policy have been saved within the Knowsley Local Plan Core Strategy January 2016 as follow:

"POLICY ENV8: TELECOMMUNICATIONS DEVELOPMENTS

1. Proposals for new telecommunications masts and associated antennae and buildings will not be permitted unless the applicant has demonstrated that the following criteria would be satisfied:

a) Where the proposal is for a free standing mast, the need for the development could not, for technical reasons, be met in a more environmentally acceptable manner by:

- Sharing an existing mast or site,
- Erecting antennae on an existing building or other structure;

b) The development would not, by reason of its scale, siting or design, have an unacceptable impact on the character or appearance of the surrounding area, or the amenity of nearby residents.

2. New telecommunications development will not be permitted within environmentally sensitive areas, such as Conservation Areas, residential areas or the Green Belt, unless the applicant has demonstrated that there are no other suitable alternative sites outside such areas and that appropriate steps have been taken to minimize any visual impact through careful siting, design and screening.

3. Applications for development by telecommunications code system operators must be accompanied by:

a) Evidence that the proposal would comply with all relevant ICNIRP14 Standards (or future guidance which may supersede the current guidelines), taking into account any cumulative emissions from other nearby telecommunications equipment;

b) Evidence of how the proposal fits into the wider network, regionally and nationally.

c) Where the telecommunication development would be on or near a school or college site, evidence that the governing body of the relevant school or college has been consulted. "

The policy has been complied with in that:

1 a Detail has been provided explaining the need for a new mast and the reasons why existing structures or buildings cannot be utilized.

1 b The design and location of the mast is such that impact on the surrounding area has been minimized.

2. The site is not within a designated area.

3. The required information is included within this application.

The site has been sited and designed to minimize its screening within the local streetscene, the support pole and cabinets are proposed to be colored grey to minimize impact, is considered they would assimilate successfully into its surroundings

The proposed development would not appear out of place. There are a number of other vertical features along Coplehouse Lane. The minimal impact of the development would be outweighed by the benefits of the proposal.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy, the proposal is sympathetically designed, it minimises the number of

installations and has a high quality of design. It would significantly enhance the provision of local community facilities and services and would protect amenity.

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 yellow outline) and existing CK Hutchison Networks (UK) Ltd 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 wraparound 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:
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. In accordance with the requirement set within National Planning Policy Framework (February 2019) guidelines; the proposed 'Streetworks' design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture.

4. Technical Information

ICNIRP Declaration attached 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.	Yes	
--	-----	--

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 to be 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 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.

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

Discounted Options

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.

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”.

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

Discounted Options:

Site	NGR	Discounted Reason
D1 –Whitefield Drive	E 340057 N 398361	Pavement not wide enough to house SW. Location also on a residential street.
D2 – Whitefield Drive	E 340181 N 398268	Pavement not wide enough to house SW. Location also on a residential street.
D3 – Eastfield Walk	E 340065 N 398197	Pavement not wide enough to house SW. Location also on a residential street.
D4 – Ingoe Lane	E 339910 N 398383	Pavement not wide enough to house SW. Location also on a residential street.
D5 – Fernhurst Road	E 340238 N 398448	Pavement not wide enough to house SW. Location also on a residential street.
D6 – Oatlands Road	E 340022 N 398542	Pavement not wide enough to house SW. Potential visibility splay issue.



7. Additional Relevant Information

Background to the Proposal

CK Hutchison Networks (UK) Ltd 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 10th November 2020 (Appeal Reference: APP/A5840/W/20/3254830).

Conclusion

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

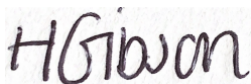
Taking into account the site-specific factors and technical constraints, available options and planning constraints, it is considered that the proposed street pole clearly represents the optimum environmental solution to extend coverage to the target Community.

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)	Hannah Gibson BSc (Hons)	Telephone:	07428 015034
Operator:	CK Hutchison Networks (UK) Ltd	Fax no:	N/A
Address:	Dot Surveying, The Bonds (Suite 31), 2 Anderson Place, Edinburgh EH6 5NP	Email Address:	h.gibson@dotsurveying.co.uk
Signed:		Date:	21 st July 2021
Position:	Planner	Company:	Dot Surveying Ltd
		(on behalf of above operator)	