

SUPPLEMENTARY INFORMATION FORM

1. Site details

Site Name	Bigdale Drive SW	Site Address:	Bigdale Drive, Liverpool, Merseyside, L33 6XQ
NGR	E341991 N399036		
MBNL Cell ID	KSY079	Site Type: ¹	Macro

2. Pre-Application Check List

Site Selection

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 There is no up-to-date mast register		
Were industry site databases checked for suitable sites by the operator:	<u>Yes</u>	No
If no explain why:		

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation	16/04/2020
Was there pre-application contact	Yes
Date of pre-application contact	20/04/2020
Name of contact	Joanne Bide
Summary of outcome/Main issues raised: We sent a pre-application consultation email to the LPA on the 16/04/2020. It included a map showing the proposed site as well as an elevation drawing of a 20 metre streetworks mast and 2no equipment cabinets. The LPA emailed us to say they charge for pre-application advice. When balancing the fees of the LPA for pre-application advice, together with those incurred for a formal planning application, the applicant have chosen not to take them up on this.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green
Outline of consultation carried out Pre-application consultation emails were sent to the Ward Councillors, MP and Highways Authority. It included a map showing the proposed site as well as an elevation drawing of a 20 metre streetworks mast and 2 no equipment cabinets.	

¹ Macro or Micro

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Summary of outcome/main issues raised
The Highways Authority responded to our consultation requesting more detailed plans.
To date we have received no further comments from those consulted.

School/College

Location of site in relation to school/college
St Marie's Catholic Primary School is approximately 250 metres from the application site.

Outline of consultation carried out with school/college
A pre-application consultation email was sent to the aforementioned. It included a map showing the location of the proposed site as well as an elevation drawing of a proposed 20 metre streetworks mast.

Summary of outcome/main issues raised
To date we have received no comments from those consulted.

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 (only required for an application for prior approval)

Copy of Developer's Notice enclosed?	<u>Yes</u>	No
18/5/21		

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3. Proposed Development

The proposed site:

For reference only please see below a photograph of the application site: -



Enclose map showing the cell centre and adjoining cells:

Coverage plots can be provided upon request

Type of Structure (*e.g. tower, mast, etc*):

the installation of a 18 metre phase 8 pole with wrap around cabinet built around the base, 4no. new equipment cabinets and ancillary development thereto.

Overall Height: 18 metres

Equipment Housing: 1no. APM5930

Depth: 600 mm

Width: 600 mm

Height: 1200 mm

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Equipment Housing:	1no BOWLER
Depth:	600 mm
Width:	1900 mm
Height:	1752 mm
Equipment Housing:	1no. LINK AC
Depth:	500 mm
Width:	600 mm
Height:	1585 mm
Equipment Housing:	1no. Wrap around
Depth:	1800 mm
Width:	750 mm
Height:	1600 mm
Materials (as applicable)	
Tower/mast etc – type of material and external colour:	Light Grey RAL7035
Equipment housing – type of material and external colour:	Light Grey RAL7035

Reasons for choice of Design
The design of the new pole is at a height of 18 metres so as not to compromise on the full length of each set of the stacked antennas. The antenna heights take into account the extent of nearby built and natural obstacles that they need to clear. Also, the antenna heights cater for the character of the wider area and the site's relationship with neighbouring base stations in the EE and 3 networks. The lowest possible height has been progressed here to present the optimum angle of projection that will allow the antennas to see the target audience as much as possible and so enable a reliable signal to propagate. Within the scope of designs that are available to the applicant, it is emphasised that the width of the pole, the number of antennas, the spacing between each antenna and the size of the mast's head frame have all been kept to a minimum. The dimensions of the proposed pole are the thinnest available to the operators, in which it needs to support the weight and dimensions of all the required antennas. Also, the girth of the steel pole allows for structural wind loading and enough space for the feeder cables to run through the structure up to the antenna at the top. With regards the choice of design the proposed pole will be steel which is deemed appropriate within the street scene. For transparency the proposed new equipment cabinets are shown on the drawings and have been included in the description of development. The proposed equipment cabinets are less than 2.5 metres³ each, in which seen on their own merits they do not usually require a formal application as they are permitted development. The extent of ground-based development has been kept to a minimum when balanced against the technical requirements of this site-specific base station. They support multiple technologies for both EE and H3G and incorporate a power source. The sizes of the cabinets are justified as each needs to be large enough inside to ensure a satisfactory airflow around the equipment. This allows adequate cooling and in turn minimises the noise generated. Plus given their outdoor location, they have been designed to be

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weatherproof. The proposed equipment cabinets will be Light Grey which is considered a suitable colour in the street scene.

Technical Information

	<u>Yes</u>	No
International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)* International Commission on Non-Ionizing Radiation Protection 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 or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, EE (UK) Ltd and H3G (UK) Limited operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of EE (UK) Ltd and H3G (UK) Limited's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		

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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, capacity

Mobile Broadband Network Ltd (MBNL) is a joint venture owned by EE (UK) Ltd, formerly Everything Everywhere and H3G (UK) Ltd, commonly known as Three. MBNL undertakes the management and network deployment of telecommunications sites on behalf of both EE and Three.

Mobile telecommunications networks are now ubiquitous throughout the UK. It is an expectation that an individual can connect and use their mobile phone whenever and wherever they so require. With the advent of new technology, further advances are proposed, and Central Government has seen mobile connectivity in particular 5G, to be at the forefront of economic development. The expectations are that future technology will support government policy regarding digital inclusion; improvements in health and social care; assisting in local economic growth; advancing the development of Smart Cities and supporting innovative uses throughout the transport sector for both personal and public travel.

At the beginning of March 2017, the Department of Culture, Media and Sport (DCMS) issued an updated UK Digital Strategy with the goal of ensuring that the UK delivers a world-leading digital economy that works for everyone. The DCMS also sees new technology and improved connectivity and coverage as key to the future growth, both socially and economically, of the UK. In conjunction with the new Electronic Communications Code (2018), the DCMS wishes to make it easier for operators to deploy base station and share their equipment with other operators in order to help increase coverage and capacity. At the heart of the new legislation and one of the Government's key aims is to deliver on the public benefit of having access to a choice of high-quality electronic communications services, hence the proposed new installation will provide the area with EE and Three signals, including most notably new 5G technology.

The proposed new mast has been sited and designed in order to provide 5G coverage and to support the existing mobile network. At present it is paramount that digital connectivity is supported and maintained throughout the UK. In particular, there has been a massive shift in user demand from city centres and places of work to residential areas and suburbs, hence this requires an improvement in coverage and capacity throughout the whole network. The current proposal therefore provides such additional capacity to the network whilst still bringing 5G to the area.

The proposed development is within the limits set out in Part 16 for permitted development with prior approval. The location enables the whole of the surrounding area to benefit from 5G network coverage and has been designed to be future proofed, thus enabling other technologies to be deployed depending upon the demand required.

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As the shift in demand is expected for the foreseeable future and as Central Government considers digital communications to be a critical national infrastructure, the development intends to support customers, residents and businesses by ensuring as little disruption as possible. The existing site will therefore be retained so that all existing users may benefit at this difficult time. In addition, EE provide coverage for the Emergency Services and in order to dedicate the 4G network for that use, the intention is to support all users during the current climate and to maintain all current services without the removal of any existing equipment.

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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)

Option	Type	Address	NGR	Reason for Discount
A	Existing Streetworks	Bigdale Drive, Liverpool L33 6XQ	341986, 399038	This existing mast was considered however, it is not a shareable structure in its current form and cannot accommodate any further equipment. It would require significant redevelopment and a completely new mast of substantial width and height; therefore redevelopment would be visually intrusive within the street scene, compromise pedestrian movements and impact on highway safety.
B	Existing Streetworks	Minstead Avenue, Liverpool L33 6XS	342058, 398982	This existing mast was considered however, it is not a shareable structure in its current form and cannot accommodate any further operators. It would require significant redevelopment and a completely new mast of substantial width and height; therefore redevelopment would be visually intrusive within the street scene, compromise pedestrian movements and impact on highway safety.
C	Existing Streetworks	Minstead Avenue, Liverpool L33 6XS	342058, 398992	This existing mast was considered however, it is not a shareable structure in its current form and cannot accommodate any further operators. It would require significant redevelopment and a completely new mast of substantial width and height; therefore redevelopment would be visually intrusive within the street scene, compromise pedestrian movements and impact on highway safety.

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D	Rooftop	The Peacock, Bigdale Drive, Liverpool L33 6XJ	342022, 399042	This building was considered, however was determined to be too low to host a sensitively designed base station. When taking into account the roof shape, overall building height, as well as its surrounding context, a rooftop proposal of significant height would be required to meet the operator's technical requirements. It is considered that such a proposal would be out of keeping with the host building.
E	Rooftop	William Hill, Quarryside Drive, Liverpool L33 6XN	342050, 399033	This building was considered, however was determined to be too low to host a sensitively designed base station. When taking into account the roof shape, overall building height, as well as its surrounding context, a rooftop proposal of significant height would be required to meet the operator's technical requirements. It is considered that such a proposal would be out of keeping with the host building.
F	Rooftop	Northwood Chapel, 8 Quarry Dale, Northwood, Liverpool L33 8XU	341963, 399016	This building was considered, however was determined to be too low to host a sensitively designed base station. When taking into account the roof shape, overall building height, as well as its surrounding context, a rooftop proposal of significant height would be required to meet the operator's technical requirements. It is considered that such a proposal would be out of keeping with the host building.
G	Rooftop	Quarry Green Flats, Quarry Green, Liverpool L33 8XZ	341823, 399175	This building was initially considered; however it was found to be too tall as a rooftop proposal here would create interference and cell dominance with neighbouring base stations in the wider network.

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Additional relevant information:

Permitted Development subject to GPDO Prior Approval

It is a material planning consideration that weight should be given to the submission type and the current planning mechanisms relevant to telecommunication infrastructure. As set out in The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 2) Order 2016 in the case of a new ground-based mast, up to 20 metres in height on highways-controlled land requires a Prior Approval determination.

It should be remembered that in determining this application for Prior Approval it is a lighter-touch process that is much less prescriptive than those relating to full planning applications, as the principle of the development has already been established. In this respect it should be recognised that the siting and appearance of streetworks style base stations are commonplace throughout the UK, have been already been accepted in the immediate locality of the application site and elsewhere in the authority.

It is appreciated that the Council may have ongoing difficulties in progressing applications due to the current covid-19 restrictions, we would urge the LPA to try and progress this application as a 'Priority Submission' within the 56 day timeframe due to its critical national importance communications have at this time.

Planning Appraisal

The main material planning considerations in the determination of this application should focus on the scheme's siting and appearance and so its effect upon the character and appearance of the area. In this respect the case should be assessed as to whether any harm caused by reason of the new mast's siting and appearance is outweighed by firstly the potential availability of alternative sites elsewhere that if they exist are realistic options within the scope of this requirement and so whether they are less harmful. Also, in making a balanced assessment, it must be considered as to whether the appearance of the proposal, has been minimised so far as practicable within the constraints of the designs that are available to MBNL. Design criteria includes the mast's height and so the technical factors that have influenced its form and aesthetics must be appreciated.

As advocated in NPPF, Chapter 10 – Supporting high quality communications, February 2019, a sequential approach to site selection has been taken in this case. NPPF makes it clear that the number of masts, and the sites for such installations, should be kept to a minimum.

Before deciding to pursue a completely new base station development, EE and Three will always look at upgrading their own existing sites in their wider networks, where possible to fulfil the coverage requirements in a specific area. In this region the existing base stations in the surrounding networks are being upgraded where possible to

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accommodate the latest technologies and capacity. At a localised level the existing sites in the immediate consolidated networks neighbouring the Bigdale Road site have also been optimised to their full potential. Given their established whereabouts in the respective networks and the evolving demands of customers, this has resulted in a defined area where coverage and capacity is needed for EE and Three. In this regard, it has been found that there are no other neighbouring base stations elsewhere in the wider networks that can compensate for the cell specific requirements in this part of Liverpool. Therefore, when this technical requirement has arisen here and 5G is being rolled out, it has been the operators first point of focus to upgrade their own existing base stations as these already technically fit into their established networks.

This approach is consistent with the needs of consumers and the efficient operation of the specific networks when providing coverage and capacity for future expansion. Indeed, it has been embedded within telecommunications planning policy as far back as PPG8 from the early 1990s that there should always be an expectation to use existing masts, wherever practicable and co-locate nearby to avoid the unnecessary proliferation of such development. In accordance with the operator's licence obligations, NPPF and the Code of Best Practice on Mobile Phone Network Development, MBNL have reviewed existing telecommunications provision operated by EE and Three in the intended target area. An existing EE and Three base station has been identified in which taking advantage of the MBNL agreement a sequential approach to site selection has been taken.

As noted in section 5 - Site Selection Process of this industry standard template, which derives from the Code of Best Practice then ordinarily "alternative sites considered and not chosen are not generally required for s/alterations to existing sites including redevelopment of an existing site to facilitate an ." This is because alternative sites would have been considered by the operator and determining planning body when this now existing base station was first conceived and established on-site. In approving it then, a formal planning assessment has judged the site of the existing mast to be an appropriate location for telecommunication development within this area. Nevertheless, to minimise coverage downtime during construction it is noted that the new installation is not a direct on the exact same spot as the now existing mast, therefore the applicant have considered alternative sites that need to be within reasonable close proximity of the existing site. In doing so the applicant considers that there are no suitable alternative locations that would be far superior in their planning merits than that of the site progressed in this application. Therefore, in terms of "siting" criteria it is concluded that the location of the new mast is justified.

To support the site position yet further it should be appreciated that given the land use character and road layout of the wider target area, the applicant have naturally gravitated towards co-locating as near to as possible the existing EE and Three mast that will in time be removed.

It is acknowledged that there are residential properties in the immediate vicinity, such as the need to provide coverage and capacity to the customers in this part of Liverpool. Nevertheless, it is felt that the identified position, height and design, when catering for any foreseen impact upon the wider residential amenity, balanced against those

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houses found closest would be minimal. The nearest houses are found to the rear, however it is considered that activity on Bigdale Drive itself, the extent of boundary treatments and the distance of separation would not undermine their visual amenity when seeking out the installations presence.

From the wider area it is apparent that only the top section of the new pole would be visible above the immediate built and natural environment and so against the skyline. Therefore, when taking into account the angle of perspective, coupled with the foreground and background screening which would break up any view of the new monopole in its entirety, the siting of the proposal would not significantly undermine the amenity of those residents in the far wider area.

Furthermore this section of Bigdale Drive is the main commercial zone in the area, in which the monopole would be read in the context of linear street furniture, including lighting columns and telegraph poles. Also, the proposed new equipment cabinets will be seen in the street scene setting that contains a range of other street furniture paraphernalia including road signage, utility cabinets and railings.

In light of the above assessment, it is considered that the siting of the proposed scheme on Bigdale Drive is justified and is the least sensitive location. It is the closest site that can found to the existing mast and so it would meet EE's and Three's technical requirements, whilst minimising any resultant environmental impact so far as practicable.

Moving on, the fundamental principles applied by MBNL is always to minimise the contrast between the appearance of the site-specific proposal in its relationship with its environment, when balanced against the various reasons that have brought them to progress this particular position and new design. Irrespective of the installation's use as a telecommunications base station, the introduction of a new item of street furniture on Bigdale Drive will always be, to some degree, a noticeable addition to regular passers-by and residents found closest when seeking out its presence. However, it should be recognised that visibility does not automatically equate to an overwhelming adverse harm occurring. Furthermore, there is no right to a view, in which planning controls should not seek to safeguard for the continuing benefit of an individual, except where the view from a particular location is a valued public asset. Therefore, just because the streetworks style base station will be seen and is different to another existing item of street furniture that people have become accustomed to, then this should not automatically equate to the appearance of the mast being unacceptable. A balanced assessment should be made when considering all material planning considerations, most notably there should be an appreciation of what is achievable within the scope of telecommunication infrastructure that has ultimately influenced the scheme's siting and appearance.

With regards the appearance of the new base station's, then it should be appreciated that the technical requirements of telecommunication operators like EE and Three are well documented. As previously discussed, the appearance of the base station is justified when considering the structure designs that are available in fulfilling all the technologies that EE and Three operate on, added to their new 5G rollout. Ground-

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based masts may not always be reflective of the older masts, installations deployed by other operators nor the immediate street furniture structures. These other structures are intended to serve a completely different purpose and in fact it would be extremely unrealistic to expect that a ground-based mast could replicate exactly the height, profile and aesthetics of something else intended to serve a different purpose. Simply put it would not present a viable solution that would meet the operator's technical requirements nor vice-versa would a telecommunications scheme suit another function apart from that which it was intended to do. It is established in planning policy, guidance and at appeals, that it is the technical requirements of the operators and the antennas used that dictate the height and design of their installations. Therefore, it must be recognised that given its very nature and their technical ability, antennas need to be sited at height above the immediate built and natural clutter. This means the new mast may well be taller than existing linear features and nearfield obstacles in order to provide the necessary coverage and capacity to the intended area of Liverpool.

With regards appearance, the height of the new mast is justified as it has a number of stacked sets of new antennas that will be used by both operators and will provide multiple technologies, including the latest 5G signals. The overall height has been kept to its absolute technical minimum as this is so as not to compromise on the centre line of all the antennas when considering the extent of surrounding obstacles that need to be cleared. Also, the mast's height to top takes into account the extent of the target area and its topography in relation to neighbouring sites in the wider EE and Three networks. The lowest technically possible height has been progressed here so as to present the optimum angle of projection that allows the antennas to see the target audience as much as possible beyond the immediate obstacles. In this respect the height of the new mast, 18m to top will enable a reliable signal to propagate across the target area and so fulfil the operators technical requirements.

Taking this further, it should be recognised that should a stacked antenna height be any lower, then this would have a direct impact on the proposed base station performance as its signals would be blocked by the immediate obstacles. To do so the base station would not be technically viable and it would result in the need for yet another new base station in the locality. In this respect the height of the new mast at 20 metres presents the optimum technical solution and negates the unnecessary need for additional base stations to serve the target audience, that can be fulfilled by one new base station on Bigdale Drive. Thus, in progressing the application site and overall height of 18 metres minimises the impact on the character and appearance of this area of Liverpool as it prevents the proliferation of telecommunication development.

Another material planning consideration that should not be overlooked is the scheme on Bigdale Drive has inbuilt sustainable qualities as it is a mast share solution for EE and Three. In this respect to the untrained eye, its design gives the illusion of a lone operator base station. Indeed, this shared solution safeguards the character of the area, its street scenes and minimises the introduction of unnecessary street furniture. It negates the need for the two operators to build independent sites to meet their Ofcom licence commitments. This should be given material weight as this approach

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complies with NPPF regarding mast sharing and keeping the number of base station sites to a minimum.

With regards the relevant policy context, as set out in NPPF there should be a presumption in favour of sustainable development and so granting permission. In this respect in all planning determinations consideration should be given to the three mutually dependant dimensions of economic, social and environmental matters. In making decisions, the determining body should also be mindful of the position set out in NPPF, paragraph 11 that *“d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date”, in so far as “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”.*

Irrespective of whether a local planning policy exists or not, specific to telecommunications development or in relation to a general policy on per-se design taken from the Knowsley Metropolitan Borough Council Development Plan, it is apparent that upmost material weight should be given to NPPF. Most notably Chapter 10 – Supporting high quality communications and so the contributing factors that connectivity plays in providing public benefits as set out in Chapter 6 - Building a strong, competitive economy. These chapters should be of primary importance in the determination of this case, in which it is evident that proposed scheme on Bigdale Drive is in accordance with NPPF. As alluded to previously the presence of streetworks style base stations of varying heights and designs are now commonplace throughout the UK. Over the years as new spectrums have been released and the need for greater capacity increases, operators will inevitably seek to build their own infrastructure to meet customer expectations and demands for connectivity. In this respect the approach to site selection here is nothing out of the ordinary and accords with NPPF in operating an efficient network and providing reasonable capacity for future expansion. The proposal is a mast share solution and as the existing mast cannot support any further antennas its redevelopment has been discounted and the operators seek to be co-located nearby. Such is the technical requirements to provide coverage and capacity, paragraphs 114 and 116 of NPPF acknowledges that new telecommunications development in certain areas should not be resisted as a matter of course. Similarly, the planning system should not introduce competition between different operators nor should the need be questioned. When considering the case presented then clearly the proposal is acceptable and in accordance with this planning policy stance. In this respect the Government’s position on connectivity and the up-to-date NPPF, tilts the balance in favour of the development so much so that it outweighs the environmental harm that will be created by the new streetworks base station on Bigdale Drive. NPPF contains the most up-to-date planning policies on the matter, however it is considered that where relevant to telecommunications development, the proposal accords with the adopted local planning policies taken from the Knowsley Metropolitan Borough Council Development Plan.

In conclusion, material planning weight should be given to the sequential approach to site selection, the development’s mast share qualities, need and the technical influences the have dictated the proposal’s height and design. Overall, it is evident

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that the new mast will result in a minimal impact in this area of Liverpool. In this respect the Bigdale Drive proposal is in accordance with the relevant local and national planning policies, when taking a balanced assessment. Therefore, it is considered that any harm will be less than substantial and be outweighed by the social and economic benefits.

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18 May 2021

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Mono Consultants Ltd for and on
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