SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Manchester Brunswick South	Site Address:	Footpath of Upper Brook Street, Brunswick, Manchester, M139TX
NGR:	E 384828, N 396810		
Site Ref:	129444_VF	Site Type:[1]	Macro

2. Pre Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	**No**
If no explain why: The LPA does not have an up-to-date mast register and rely on their own on-line planning records which detail all applications. Nevertheless this information has been reviewed where found.		
Was the industry site database checked for suitable sites by the operator:	**Yes**	No
If no explain why: n/a		

PLANNING AND BUILDING CONTROL
18 APR 2013

Annual roll out consultation with LPA

Date of last annual rollout information/submission:	12.10.12
Name of Contact:	j.roscoe@manchester.gov.uk
Summary of outcome/Main issues raised:	General rollout within the authority

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	21.01.13	
Was there pre-application contact:	Yes	No
Date of pre-application contact:	21.03.2013	
Name of contact:	Julie Roscoe	
Summary of outcome/Main issues raised: A pre-application consultation email was sent to the LPA on 21.01.13 introducing a number of existing sites, which are earmarked to be upgraded as part of the new CTIL initiative. This email included the option subject to this application, in which it was said that minimal changes were proposed. To date no comments have been received. A meeting was held with the Local Planning Authority at Manchester City Council on Thursday 21st March 2012 with Richard Birchfield, Community and Planning Specialist for CTIL and the Head of Planning, namely Julie Roscoe. It was highlighted that there would and has been a high volume of upgrade applications submitted to the authority, in which the LPA were generally receptive to proposals and saw no significant issues with upgrade program. General matters of discussion by CTIL related to the changing dynamics of the telecommunications infrastructure industry and the strategic network grid restructuring of existing base station sites in the authority by Vodafone as the regional operator. The LPA highlighted their broad planning procedures for dealing with applications i.e. the alignment and allocation to area planning officers and upcoming committee dates. Nonetheless, the proposal relates to the upgrade of an existing base station which has previously been approved by the LPA. In this regard it is clear that the principle of telecommunication development has been accepted on-site in which when balanced against the minimal changes proposed, it was considered appropriate to progress this application and seek the LPA's formal determination.		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	**Green**	Amber	Red
Outline Consultation carried out: A pre-application consultation email was sent to the ward councillors on 21.01.13 introducing a number of existing sites, which are earmarked to be upgraded as part of the new CTIL initiative. This email included the option subject to this application, in which it was said that minimal changes were proposed.			
Summary of outcome/Main issues raised: To date no comments have been received.			

[1] Macro or Micro

School/College

Location of site in relation to school/college: - Given the proposal relates to an upgrade of an existing streetworks style base station already present in the street scene no consultation was undertaken with any nearby schools or colleges.
Outline of consultation carried out with school/college: - n/a
Summary of outcome/Main issues raised: - n/a

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

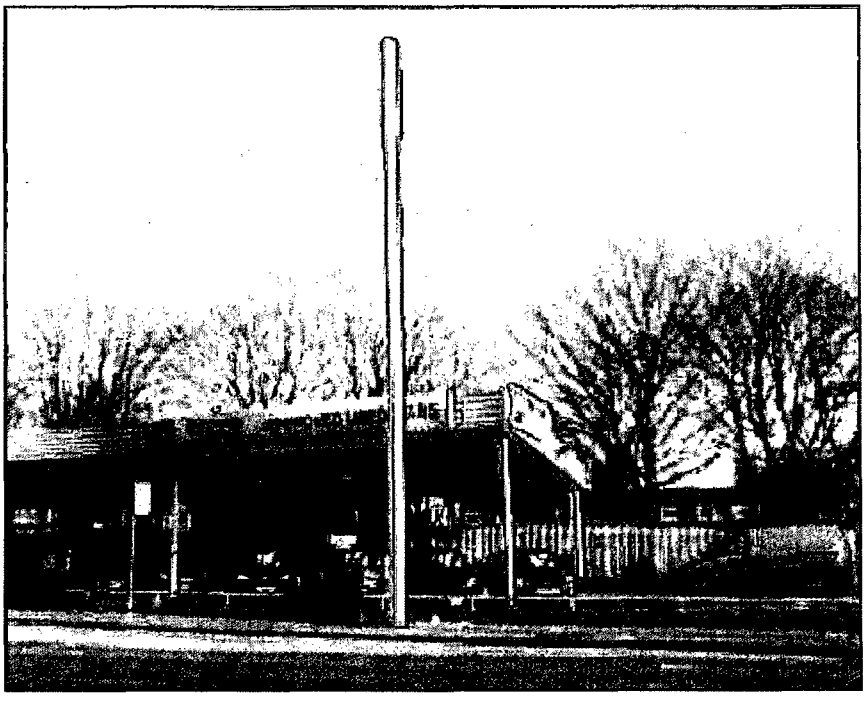
Will the structure be within 3km of an aerodrome or airfield?	Yes	**No**
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	**No**
Details of response: n/a		

Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	No
Date served:	-	08.04.13

3. Proposed Development

The proposed site:
This application relates to an existing telecommunications installation which is found on-site. For reference please see below photograph of the base station in-situ: -



Type of Structure	Jupiter
Description: The installation of a 17.5 metre dual user monopole housing six antennas mounted together at the top of the structure. The main stem of the column is cylindrical and will measure 324mm in diameter in which towards the top it will taper to a 540mm diameter antenna shroud. It is of note that the proposed scheme involves the replacement of the existing 15 metre high structure for that described above. There will also be 2no. additional cabinets, whilst 1no. existing equipment cabinet and 1no. electrical meter pillar shall be retained The dimensions of the proposed equipment cabinets are detailed below.	

Overall Height:		17.5 metres
Equipment Housing:		Vulcan
Length:		1898 mm
Width:		798 mm
Height:		1648mm
Equipment Housing:		BTS 3900AL
Length:		770 mm
Width:		750 mm
Height:		1925 mm
Tower/mast etc – type of material and external colour:	Galvanised steel - painted grey (RAL 7035)	
Equipment housing – type of material and external colour:	Galvanised steel - painted green (RAL 6009)	

Reasons for choice of design:

Vodafone and Telefónica have a common interest in providing coverage from the same site through the use of a single base station. In this instance Vodafone Limited are acting as the lead operator, in which infrastructure provision and coverage will be made for Telefónica UK Limited, commonly known as O2. The choice of design in this latest case has been influenced by the existing base station's siting and appearance, whereby the extent of development has been kept to minimum. It is of note that the existing streetworks style monopole is technically obsolete due to its design limitations and its inability to accommodate the required apparatus, in this next of phase infrastructure consolidation hence it needs replacing.

As part of a sequential approach to site selection an existing base station made available as part of the Cornerstone initiative was identified. However it is of note that the existing streetworks style installation in its current form does not meet the operators technical requirements hence the existing base station requires redevelopment. The aim of this phase of the Cornerstone project is to align the Vodafone and Telefónica networks where best possible. The long term objective of this will be to reduce the total number of base stations nationally as sites will be consolidated for single base stations that work for both operators. The mast design pursued offers a technically preferred solution, in which where possible antennas can be titled and orientated so as to provide cell specific coverage to the demands of the target area. The height pursued will improve the coverage footprint from the site. The latest proposal will enable network restructuring that will aid single grid improvements so that existing base stations elsewhere in the existing respective networks can be removed. Furthermore in progressing a robust structure and equipment designs this will help to address existing and future demands for mobile coverage. It is also of note that the operators require a 2.5 metre high increase in the height of the replacement column due to the height, massing and density of the surrounding trees, which significantly impact upon the installations ability to propagate its signal to the whole of the area targeted.

Technological advances and the Cornerstone agreement has enabled a mast share structure that breaks the barriers of conventional mast share schemes which in the past have typically involved tall heights due to the separation needed between sets of stacked antennas and or large exposed antenna head-frames. Aware that some standard mast designs with separate operator exposed antennas can appear incongruous within a particular street scene, it is highlighted that the antennas would be concealed within a cylindrical shroud which would be integral to the upper most section of the monopole. The overall height of the proposed column at 17.5 metres to top has been kept to its technical minimum given the structure types which are available to the aforementioned operators. The proposed monopole is at a height of 17.5 metre so as not to compromise on the centre line of the existing antennas and to allow for adequate coverage to the target area. Furthermore the dimensions of the structure are the thinnest available so as to be able to support the technically preferred antennas and feeder cables. Taking advantage of the Cornerstone initiative, it is of note that the antennas which function for both operators are closely spaced together so as to keep the profile of the column as thin as possible. In this respect each operators antennas are not distinguishable as separate elements, whereby taking into account the form and appearance of proposed column as a whole, to the naked eye the mast share monopole gives the illusion of a single operator installation. Furthermore it is considered that in opting to connect the site into the national network via an underground link rather than rely on a transmission dish, this has simplified the design and hence reduced the proposal's prominence in the street scene. It is of note that the proposed column in its entirety will be painted grey in which it is considered that this treatment will help assimilate the column into the street scene. The choice of a slim-line streetworks monopole with shrouded antennas is considered to be appropriate as it would minimise the visual impact of the development within the street scene. In light of the above and in choosing this particular monopole design, it is considered that the scheme takes a form which is sympathetic within the context of its immediate street scene.

It is of note that the proposed equipment cabinets are small for a telecommunications development (less than $2.5m^3$) and will be located alongside the new monopole. The proposed equipment cabinets have an appearance similar to existing cabinets found in a street scene. The proposed ground based development will be painted green hence helping it to blend into its environment and reducing its prominence within its immediate environment. In this respect it is considered that the design of the ancillary development will not have a detrimental impact upon the visual amenity of the area.

4. Technical Information

ICNIRP Declaration attached ICNIRP 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**	No

Frequency:	1800 & 2100 MHz
Modulation characteristics[2]	GSM & UMTS
Power output (expressed in EIRP in dBW per carrier) In order to minimise interference within its own network and with other radio networks, Vodafone 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 Vodafone'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.	Maximum 32 dBW
Height of antenna to top (metres above ground level)	17.4 metres

5. Technical Justification

Reason(s) why site required e.g. coverage, upgrade, capacity
A retained base station site is required in this location in order to maintain existing network coverage and capacity, as well as catering for future networks demands for both Vodafone and Telefónica, commonly known as O2 to this area of Manchester. Vodafone and Telefónica are both Electronic Communications Code Systems Operators licensed under the terms the Communications Act 2003 to provide mobile personal communications networks in the UK. In order to improve the level of service it provides for their customers in line with its licence requirements, both companies are constantly developing their networks, as well as refining and modernising their equipment. Given the dynamic nature of technological advances in telecommunications products, coupled with the demands on operators from subscribers to provide new and better quality services, this dictates a continual reinvestment programme in the infrastructure behind the use of mobile devices. Operators are currently involved in developing sites to provide coverage to areas which have not benefited from access to the full services they offer and to areas of their existing network where increased capacity or improved service quality is required. Many more people now use mobile devices for personal and business purposes and to a large proportion of the UK population; the use of a mobile phone is now considered an essential part of people's everyday lives both at work and in their leisure time. These customers legitimately demand and expect to have adequate signal coverage and capacity for their mobile devices throughout the country. Mobile phones are now intrinsic to our personal and professional lives and with that people expect they will be able to use their devices when and wherever they need them. However it remains the case in some areas and at particular times of the day, capacity on mobile networks may not keep up with demand, creating network congestion, poor download speeds and service disconnections. Combating these technical deficiencies are at the forefront of the origins of a new search cell instruction and the need to upgrade exiting base station sites in an operator's network.

[2] The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase modulation
The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation

The ownership and use of mobile devices has changed dramatically since its mass market conception in which the introduction of pre-pay mobile tariffs in the late 1990s led to rapid growth in mobile phone take-up. This resulted in fierce competition between operator providers which lead to falling prices, meaning mobile phones and usage are a lot more affordable to the general consumer market. As the cost of a handsets and bundle packages has fallen this has coincided with the decline in the use of fixed line calls, whereby according to the independent regulator and competition authority, Ofcom, in 2006 household mobile take-up passed that of fixed lines for the first time. Indeed the Mobile Operators Association have said that *"the volume of calls from mobile phones exceeded the volume of calls from fixed phones in 2011, comprising 52% of total voice calls"*

Mobiles are now ubiquitous to most peoples lives in which according to the MOA there are now 81.6 million subscriptions in the UK. With regards the basic functionality of mobile phones the MOA suggest that mobile consumers in the UK sent over 150 billion texts in 2011 with the average person believed to send 50 texts a week. Although the main functionality of mobile phones to support voice calls and messaging remains at its core, in recent years the emergence of smart phones and high-spec wireless devices has put added pressures on operators networks as customers demand reliable data streaming and coverage capacity. In this regard the increased ownership of smart phones is driving significant increases in the number of people accessing the internet on mobile phone networks, creating the emergence and growth of the 'pocket internet'. Indeed the MOA highlight that the average time spent using mobile data services was 2.1 hours a month in 2011, while the volume of data consumed more than doubled in the 18 months to January 2012. Accordingly as data volumes over mobile networks has increased this demand has put significant strain on operators existing networks infrastructure and thus the need for more base stations. Ofcom have reported that over a quarter of the population in the UK said they have a smart phone, more than double the number two years ago, in which 23% of adults are reported to access internet content and or send emails from their mobile phones. In this respect many consumers have commented that typical mobile speeds and usage caps are insufficient for the use of data-hungry mobile devices seeking to download music, video content and applications. Indeed internet-based communications services such as social networking sites and instant messaging has put added pressure on mobile phone networks as the growth in the average time spent online can be attributed to the use of the internet becoming more mainstream and accessible via mobile devices.

Indeed the MOA reports that *"Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion. There are now over 81.6 million mobile subscriptions in the UK. Over 5.1 million people now access mobile broadband services via a laptop and dongle, and 39 per cent of UK adults use their mobile phone for internet access."* Ofcom have noted that many households now have a variety of means of telecommunications available at their finger tips from their use of satellite systems, fixed line telephones, broadband and mobile phones. However there has been a growth in the proportion of mobile-only homes as network providers increase the amount of minutes that are bundled within mobile contract line rental and market dongle support, meaning that it is not always necessary to have a landline in order to be able to access the internet. Furthermore it was said by the MOA that at the end of 2011 the Mobile Operators Association report that 15% of adults live in a home that has a mobile phone but no landline. In-building coverage and capacity is a key objective of the operators infrastructure rollout and upgrade, however given the very nature of mobile devices which can be taken and used wherever they are needed, this has resulted in the need for high threshold levels of 3G coverage to provide this indoor service to its customers. Also in light of the use of smart phones, SIM card enabled tablets as well as mobile supported satellite navigation systems, this means that in car and outdoor signal strengths need to provide adequate and reliable coverage for the use of hand portable devices. According to YouGov, satisfaction among mobile users with 'staying connected' has seen the steepest declines of all network-related attributes, with 20% of mobile broadband rating their experience as poor in July 2009, compared to 9% in June 2008.

In light of the above it is emphasised that the only reason an operator seeks to place a base station anywhere is to improve the service to its customers. NPPF confirms that local planning authorities should not question the need for a proposed telecommunications development. Indeed it would not be financially viable for operators to develop their existing networks further and invest time and monies into any particular case, if there was no demand for the mobile phone service it seeks to provide. Irrespective of the above to many the correlation between their own personal mobile phone usage as opposed to the wider customer needs and demands in a particular area are unrelated matters. Given peoples expectations that their mobile devices will function 24-7, when and wherever they need them, it should not be taken for granted that there is a robust telecommunication infrastructure behind their use. New base stations are required as each cell can only support a finite number of users at any one time. If there is a high customer demand in a cell then greater capacity is required. Therefore a base stations contribution within the operator's network should be seen as an important economic driver and material planning consideration.

Further detail regarding the general operation of the Vodafone and Telefónica networks can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the local planning authority in understanding any technical constraints on the

location of the proposed development.

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

In accordance with the operators licence obligations, NPPF and the Code of Best Practice on Mobile Phone Network Development, Cornerstone has reviewed existing telecommunications provision operated by Vodafone and Telefónica in the intended target area. An existing base station has been identified in which taking advantage of their Cornerstone agreement a sequential approach to site selection has been taken. Nonetheless it should be appreciated deriving from the origins of the now existing base station, alterative sites would have been considered.

General Background

Vodafone and Telefónica, commonly known as O2 have recently announced their plan to jointly operate and manage a single network grid in the UK. This groundbreaking initiative strengthens the network infrastructure partnership between the two companies, previously rolled out as part of 'Cornerstone' as it moves beyond simple mast sharing.

Due to the dramatic rise in the use of mobile data, the industry has had to consider new operating models that are efficient at delivering 3G and 4G services to a much larger percentage of the UK's population. Both companies will pool their basic network infrastructure, while running two, independent, nationwide networks. By doing this, they will both reach far more of the country far faster than they could achieve on their own. This single network grid will automatically increase each operator's footprint by 40%, adding competition and choice for customers in areas that previously only had one operator's coverage available. Each operator will keep ownership and control of its network spectrum. This means each will have responsibility for the management and maintenance of the grid in one half of the UK. Vodafone will be responsible for those sites in the West including Wales, whilst Telefónica will manage and maintain the network in the East, including Scotland and Northern Ireland.

Both companies pledge to close the digital divide between rural and urban areas targeting 98% indoor population coverage across 2G and 3G by 2015. That compares with about two-thirds of the country that currently receives indoor 3G coverage from either network today. This agreement will also lay the foundations for two competing 4G networks to deliver the capability for a nationwide 4G service faster than could be achieved independently. The pooling together of the networks could also mean a reduction in the number of sites in the UK from the two operators, so there would be environmental benefits too. They will also be able to build new sites in areas which neither company has been able to reach on its own. From a customer perspective they won't see any change as customers will continue to use each operator's network. This agreement is about consolidating infrastructure assets, clearing the way for innovation and the creation of new services that customers really want

The proposal is considered against the following planning policies: -

Planning Policies

Local Planning Policy

It is recognised that Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that *"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise"* The development plan framework is provided by the Manchester City Council Development Plan, although it is acknowledged that the Local Planning Authority are working towards formulating a Local Development Framework which will in time supersede this document. In the meantime it is considered that the following planning policy is applicable: -

DC17.1 Telecommunications

"Applications for telecommunications developments will normally be approved if the Council can be satisfied that the development has been sited and designed to minimise its impact on residential amenity and in environmentally sensitive areas. Wherever possible, the Council will expect the potential of existing buildings and masts, including the sharing of such facilities, to be fully explored before agreeing to additional separate development."

National Planning Policy

National Planning Policy Framework (2012)

5 - Supporting high quality communications infrastructure

The National Planning Policy Framework (NPPF) set out Central Government's planning policies for England and how these are expected to be applied. It replaces a number of planning documents including Planning Policy Guidance 8 – Telecommunication. NPPF sets out the Central Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Pertinent to telecommunications development section 5 of NPPF sets out the Governments general overview regarding supporting high quality communications infrastructure and is stated as follows: -

"42. Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.

43. In preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.

44. Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. They should ensure that:

- *they have evidence to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*
- *they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and telecommunications services.*

45. Applications for telecommunications development (including for prior approval under Part 24 of the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- *the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college or within a statutory safeguarding zone surrounding an aerodrome or technical site; and*
- *for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission on non-ionising radiation protection guidelines; or*
- *for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self certifies that, when operational, International Commission guidelines will be met.*

46. Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure."

Code of Best Practice on Mobile Phone Network Development (2002)
The Code of Best Practice was published in November 2002 and produced jointly by all Mobile Phone Operators, and representatives of Central and Local Government. It provides clear and practical advice to ensure that delivery of significantly better and more effective communication and consultation between operators, local authorities and local residents.

The limits of permitted development are summarised in the Code of Best Practice on Mobile Phone Network Development in which in paragraph 66 there is particular reference to equipment cabinets less than 2.5 metres in volume.

Paragraph 126 acknowledges the options for design used by an operator will be affected by site conditions, technical constraints, landscape features and capacity requirements. The main options would include mast and or site sharing; and installation on existing buildings and structures.

With regards mast and site sharing it is stated in paragraph 127 that *"it has been a longstanding Government policy objective to encourage telecommunications operators, wherever practicable, to share masts and sites as a*

means of reducing overall mast numbers."

Paragraphs 140 - 145 identify general design principles in which camouflaging or disguising equipment is considered materially appropriate. In reducing the environmental and visual impact of a ground based installation the Code of Best Practice promotes the use of simple and uncomplicated designs.

Concerning the erection of new ground based masts, paragraph 148 provides examples of where the environmental and visual impact of the mast can be greatly reduced. Paragraph 148 states:

- *Placing the mast near similar structures. For example, industrial and commercial premises, road signs and lamp posts;*
- *Using simple and unfussy designs. Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts; and*
- *Appropriate colouring.*

Annex B, paragraph 5 states that *"Radio signals are susceptible to interference and need clear visibility around the site; this means that some locations are not suitable for base station sites. The antennas need to be placed so they can cover the area of the cell and this means that they need to be placed high, often on a building or telecommunications mast. The height required will vary depending on the type of antenna, the area to be covered, surrounding topography and heights of adjacent buildings or trees."*

Annex B, paragraph 6 acknowledges that the number of base station sites depends on the area to be covered and the number of people who want to use the service. A new base station may be required to provide coverage, capacity, improve the quality of service and/or to replace an existing site.

Planning Assessment

From the outset, it should be appreciated that irrespective of the installation's use as a telecommunications base station, the change in form of an existing tall structure will always be, to some degree, a noticeable alteration to those residents and regular passers by found closest. However it should be recognised that visibility or a development's height and design does not automatically result in an overwhelming adverse harm. Similarly, it should be acknowledged that the presence of the existing telecommunications installation on-site may result in a number of preconceptions regarding the new proposal now subject to this application. In reflection it should be appreciated that these opinions may actually derive from the previous planning history and or the siting and appearance relating to the now existing mast. Irrespective of these viewpoints and what has gone before, it should be acknowledged that the existing base station is now established on-site, in which this provides a good reference point for the latest scheme's siting and appearance.

In light of the above it is considered that the planning assessment of this case should concentrate on whether the proposed changes in terms of its form when compared to the existing development are significant as to outweigh other material planning matters. Indeed it should also be ascertained as to whether there is still a need for the base station and if there have been any notable changes in terms of the development's site specific siting and surroundings. Also the latest proposal subject to this application should be reviewed against the up to date planning policy regarding telecommunications development.

As discussed previously with regards the choice of design when comparing the appearance of the existing installation with the proposed scheme, it is considered that the latest upgrade development will not undermine the visual amenity of the area. In this respect balanced against the other matters as below, it is considered that the latest CTIL proposal is acceptable.

With regards the need for the development it has been highlighted previously that the existing base station requires upgrading to meet the existing and future demands of mobile users. In this respect it's continue presence and operation is essential in providing network coverage for Vodafone and Telefonica.

It should be acknowledged that a sequential approach to site selection has been taken, whereby the proposal seeks to replace an existing ground based installation found at the application site. It should therefore be acknowledged that the proposed column would not add to the existing clutter of street furniture, as the proposal is a direct replacement for that which already exists on-site. Taking into account the residential nature of parts of the wider area, it is considered that this stretch of Upper Brook Street remains an appropriate stretch of adopted highway controlled land to site a streetworks style proposal. The scheme would be positioned on a wide stretch of pavement which allows for unimpeded pedestrian movements. There are commercial properties in the immediate locality and together with the extent of existing street furniture, including being co-located next to another streetworks style base station these are all considered features that would help assimilate its change in form into this particular environment. In light of the above it is considered that the upgrade proposal would not be overly intrusive in the street scene and its visual impact would not outweigh the continued need and future 4G demands to provide coverage.

It is recognised that the above application was determined prior to the adoption of the aforementioned NPPF. Nevertheless it is evident that the planning policy context has not altered significantly since permission was initially granted, in which the key principals of telecommunication development are deep rooted in planning policy. In this regard it is reasonable to presume that the NPPF has derived from PPG8 which was applied in the first instance. Therefore it is considered that there is limited material conflict between the latest adopted planning policies used today when compared to the policy context that has gone before. Taking into account the local planning policies which are applicable it is considered that the proposal accords with the Council development plan.

In light of the above the applicant considers that the proposal strikes a good balance between environmental impact and operational considerations.

Health & Safety

Court cases have confirmed that the public perception of health risks can be a material consideration within the land-use planning system. However the weight to be attached to this issue has to be determined accordingly in each case by the decision maker. It has been generally held, and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been demonstrated that the proposed installation will comply with the ICNIRP guidelines.

It should be recognised that it has been long since established that it is Central Government's stance that the planning system is not the appropriate mechanism for determining health safeguards. It remains Central Government's responsibility to decide what measures are necessary to protect public health. Most notably it is Central Government's view that if a proposed development meets the ICNIRP guidelines for public exposure it should not be necessary for a Local Planning Authority, in processing an application for planning permission or prior approval, to consider further the health aspects and concerns about them.

In this respect the operators believe that it is not necessary to consider health effects further. Vodafone and Telefónica as operators are committed to ensuring that all new installations are ICNIRP compliant therefore it is considered that there is no basis for this case to be refused on health and safety grounds or for reasons relating to public concerns about health and safety. An ICNIRP compliance certificate is attached as part of this submission, as required by NPPF paragraph 45, in which the ICNIRP declaration takes into account the cumulative effect of the emissions from the proposed installation and all radio base stations present, at or co-located near to the proposed installation. Radio frequency emissions from the proposed installation will be may times lower than the ICNIRP reference standard in all publicly accessible areas around the installation. In the light of the above information, it is clear that the weight to be given to such concerns should not be so great as to warrant a refusal of the case on health grounds.

Contact Details

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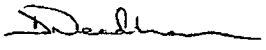
Signed:  Date: 08.04.13