

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

1. Site Details

Site Name:	Mosquito Way, Street Works	Site Address:	Small part of existing large, grassed area located off Mosquito Way, Salisbury Village, Hatfield Hertfordshire AL10 9AZ
NGR:	E: 521193 N: 208890		
Site Ref Number:	WEH21079	Site Type:	Proposed 5G telecoms installation: H3G Phase 9 15m high street pole and 3no 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:	26 May 2022
Name of contact: planning@welhat.gov.uk	Email issue to the Local Planning Department, Ward Councillors and, where applicable, educational establishments.

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 27th August 2020.

School/College

Location of site in relation to school/college: Having reviewed available mapping we note that How Dell School and the University of Hertfordshire are located within 300m of the site identified.
Outline of consultation carried out with school/college: A copy of the pre-application site detail sheet and emails were issued to these establishments.
Summary of outcome/Main issues raised: To the best of our knowledge no response or comments have been received.

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

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

Developer's Notice

Copy of Developer's Notice enclosed?	Yes
Date served:	10th June 2022

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. WEH21079_WEH139_86024_AL0792_GA_REV_A 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



- The above image is courtesy of google streetview to show the proposed mast in context

Proposed location of a new mast shown above will assimilate well into the immediate street scene and not be detrimental. We have identified a site which has lampposts and trees within the immediate vicinity, and which is not directly overlooked by residential properties. We therefore consider that this to be an appropriate site for the installation of modern 5G telecommunications infrastructure.

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 'Development Plan' for this site is formed of:

The current planning policies are set out in the statutory development plan. This includes:

- saved policies of the Welwyn Hatfield District Plan (adopted 2005)
- the Hertfordshire Waste Local Plan (adopted 2012-2014)
- and the Hertfordshire Minerals Local Plan (adopted 2007).

Of relevance to any application for prior approval for telecommunications development is



Telecommunications development can often be controversial, usually because of appearance and health issues.

Networks and operators

Each mobile telecommunications operator needs its own network of radio base stations to provide a service. Coverage areas known as 'cells' can vary in diameter from under 1km to 20-30km.

The base station comprises a number of antennas, microwave dishes and equipment cabins, which enable mobile phones to connect to each other and to the BT exchange. The antennas and dishes can either be placed on freestanding masts or on buildings. Some of the smallest base stations are built into street furniture or are disguised as burglar alarms fixed to walls.

Where base stations are located

Central government no longer keeps a register of base stations nationwide and recommends checking mast locations with your operator.

The council seeks to ensure that:

- all phone operators comply with all Local and Central Government policies and guidelines
- full and proper consultation is carried out with all parties
- development is designed sensitively so as to minimize the visual impact
- radiation levels are kept as low as possible and in any case, below the ICNIRP.

Planning requirements

Not all developments require planning permission. Government legislation permits a variety of installations to be installed without permission from the council.

Examples include:

- Smaller masts or installations on buildings, an application for prior approval is required.
- Larger installations, such as masts over 15m tall, or for development in a Conservation Area, a full planning application is required.

The consultation procedure is similar in each case. It involves letters to local residents and usually a site notice. This gives concerned parties an opportunity to express their views to the council. A decision is usually made within eight weeks of the application date.

The council has to consider applications in accordance with the criteria within the development plan (Welwyn Hatfield District Plan 2005, policy R21) and central government policy (mainly contained in section 5 of [National Planning Policy Framework](#)).

Central government has also published a [code of best practice](#) on mobile phone network development.

Telecommunications in Welwyn Hatfield

Welwyn Hatfield's development has resulted in a number of constraints, which affect all forms of development. These include conservation areas, listed buildings, the green belt and the density of residential development.

For these reasons, great care has to be taken in the choice of location for masts and antennas. This has to be balanced against the increasing demand for mobile services and the government's desire to provide the technology to meet that demand.

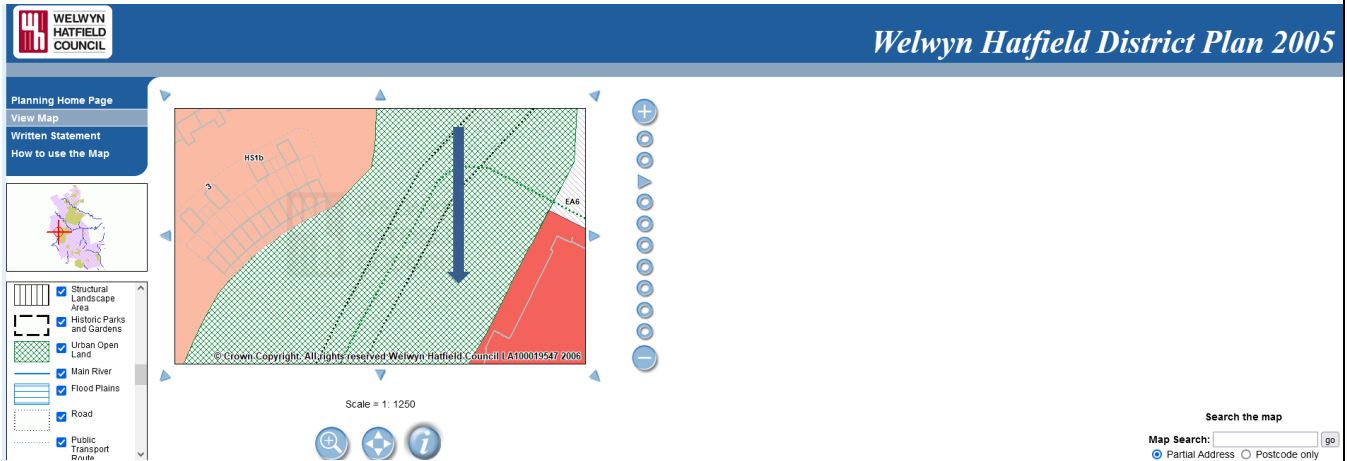
The council encourages pre-application discussions with the operators to ensure that all options are explored. This should enable applications in unsuitable locations to be discouraged early on. Discussions continue when an application is submitted, often in an effort to minimize the visual impact of the proposed installation.

Operators are encouraged to place antennas on existing masts or buildings, to reduce their visual impact. Where this is not possible, a new mast may be the only option. The council will ensure that this is sensitively designed and that use is made of existing or new screening, such as trees, fences or buildings.

Great care is taken when choosing locations for masts and antennas. It must be balanced against an increasing demand for mobile telephone services and the government's desire to provide the technology to meet that demand.

Having undertaken a review of the available planning policy maps, as per the extract below, we note that the site is not subject to constraints such as conservation area or listed buildings or tree preservation orders etc.

Whilst we note that the proposed site is located within an area of Urban Open Land, the footprint of the proposed telecoms installation is only very small and therefore it will not have any significant or demonstrate impact upon the area.



- Extract taken from the Welwyn Hatfield District Plan Interactive map 2005

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 2 below:

Figure 2 - Coverage Map: Plan showing the required area to be covered with a white tab showing the preferred location from a coverage perspective within a yellow rectangle.

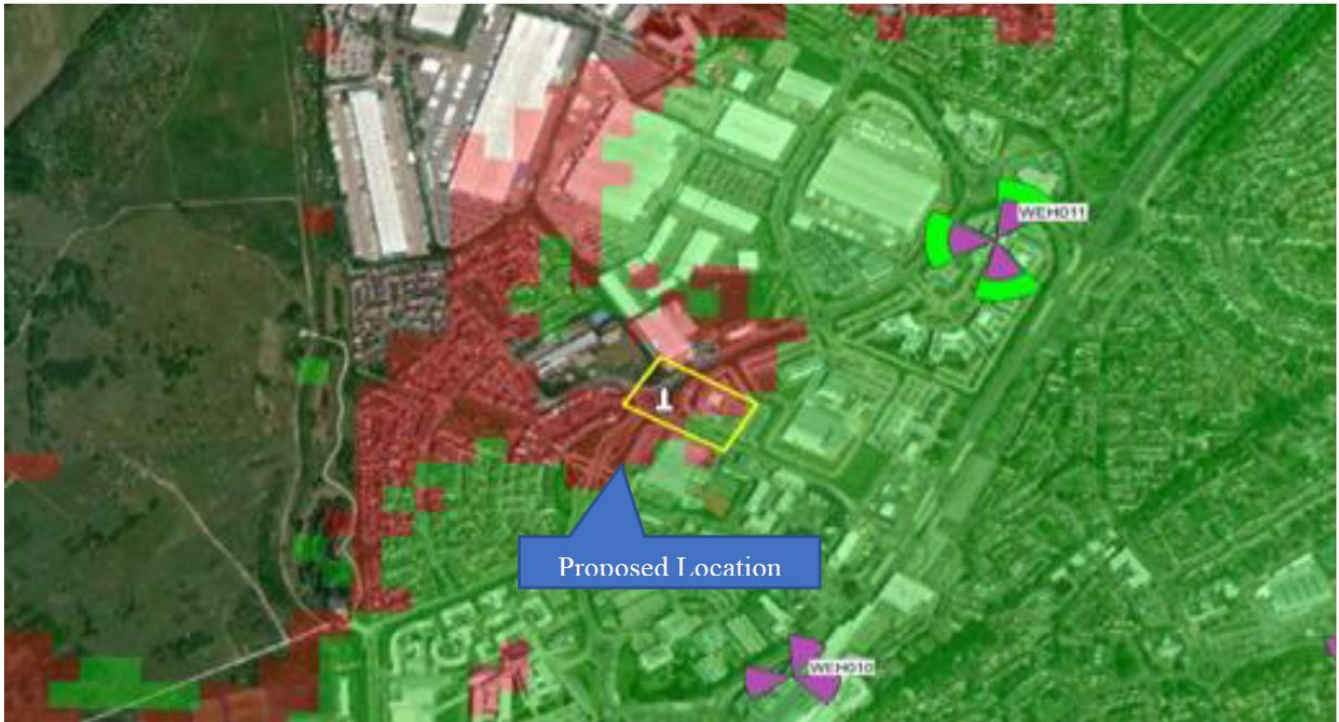


Figure 3 – This shows an illustration of the nominal location identified for a new mast to serve this area, the 100m 'search area' within which the proposed location for a new mast is usually to be and the proposed site eventually identified.



Type of Structure

Description:

Proposed Phase 9 Monopole and associated ancillary equipment cabinets

Overall Height:	See drawings
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Height of existing building	N/A
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Equipment Housing:

Length:	See drawings
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Width:	See drawings
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Height:	See drawings
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Materials

Tower/mast etc. - type of material and external colour:	See drawings
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Equipment housing - type of material and external colour:	See drawings
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Reasons for choice of design:

The proposed installation is an H3G LTE (Three) Phase 9 Monopole 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 'Street Works' design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture.

4. Technical Information

<p>ICNIRP Declaration attached</p> <p>ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). Public compliance is determined by mathematical calculation and implemented by careful location of 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.</p>	Yes	
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5. Technical Justification

<p>Reason(s) why site required</p> <p>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.</p> <p>The site is required to provide new 5G coverage for CK Hutchison Networks (UK) Ltd, 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 100m.</p>

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

<p>Discounted Options</p> <p>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</p>
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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:

As per the ‘Discounted Site plotted’ below, and information with the Pre-application planning enquiry we undertook a detailed survey of the area and for the reasons given herein we subsequently discounted other sites.

Figure 4 – Discounted sites plotted



Site	NGR	Discounted Reason
D1 – Mosquito Way	521266 , 208988	The nominal location has been discounted due to unsuitable pavements
D2 –Dragon Road	521216 , 209011	This option has been discounted due to unsuitable pavements to house the SW.
D3 – Tamblin Way	521324 , 208932	This option has been discounted due to unsuitable pavements and visibility splay issues.
D4 – Dragon Road	521147 , 208997	This option has been discounted due to unsuitable pavements and visibility splay issues.
D5 – Dragon Road	521051 , 208942	This option has been discounted due to unsuitable pavements and visibility splay issues.
D6 - Mosquito Way	521070 , 208887	This option has been discounted due to unsuitable pavements and visibility splay issues.

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.


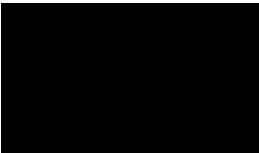
Taking into account the site-specific factors and technical constraints, available options and planning constraints, it is considered that the proposed street pole clearly represents the optimum environmental solution to extend coverage to the target Community.

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

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Signed:		Date:	8 th June 2022
Position:	Planning Manager	Company:	Dot Surveying Ltd
		(On behalf of above operator)	