

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

1. Site Details

Site Name:	Lower Mortlake Road street works	Site Address:	Lower Mortlake Road, close to the junction with Sheendale Road, Richmond Surrey TW9 2JR
NGR:	E: 518679 N: 175507		
Site Ref Number:	RUT14752	Site Type:	Proposed 5G telecoms installation: H3G Phase 8 15m high street pole c/w wrap-around cabinet and 3 further equipment cabinets with ancillary works.

2. Pre-Application Check List

Site Selection

Was the London Borough of Richmond upon Thames 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 London Borough of Richmond upon Thames

Written offer of pre-application consultation:	N/a	
Was there pre-application contact:		Yes
Date of pre-application contact:	15 th December 2020	
Name of contact:	<p>planning@richmond.gov.uk</p> <p>Email issue to Richmond Council planning and ward members.</p>	

Summary of outcome/Main issues raised:

H3G (Three) 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.

Following the submission of an e-mail to the council's planning department to the best of my knowledge and in respect of the proposed scheme itself, no formal feedback has been received from the planning department. 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).

The proposed solution to improve 5G coverage in this area is a new 15m high Phase 8 street pole c/w wrap-around cabinet and 3 associated equipment cabinets – to be coloured fir green RAL-6009 - has been proposed which is considered most appropriate to support responsible development upon the area of pavement off Lower Mortlake Road, close to the junction with Sheendale Road, Richmond.

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 – existing paved footpath with trees and other street furniture and lampposts in the proximity, as situated out with a conservation area or other such restrictive designation.

It is considered that the design, positioned upon the adopted highway (paved footpath) with trees and other street furniture off Lower Mortlake Road accords with Local Authority's critical role in delivering the UK Government's Digital connectivity vision and provides a basis for the London Borough of Richmond upon Thames Council to support the request for plans to speed up digital infrastructure rollout set out by Ministers on the 27th of August 2020.

School/College

Location of site in relation to school/college:

A review of available mapping – google maps – shows that there are no schools close to or within the locality of the proposed new mast.

Outline of consultation carried out with school/college:

N/A.

Summary of outcome/Main issues raised:

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:	13th January 2021	

3. Proposed Development

The proposed site:

H3G (Three) 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 proposed solution here, as per the enclosed application for Prior Notification, is for a new **15m** high H3G Phase 8 street pole installation c/w a wrap-around cabinet and 3no. additional equipment cabinets located – to be coloured green - on an area of existing footpath, off Lower Mortlake Road close to the junction with Sheendale Road (NGR E: 518679 N: 175507).

The technical details of this proposal are illustrated within application design drawings RUT14752_Planning_REV_C.

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. (Refer to Figure 4).

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 **15** metres, c/w wrap-around cabinet along with 3no. additional equipment cabinets, positioned on an area of existing pavement with trees and other street furniture outside the 'Kwik Fit' commercial unit is considered to be the most appropriate site following a search undertaken within the area.

The equipment orientation has been very carefully set on the area of pavement with trees and other vertical elements to help assimilate into the immediate surrounding area.

The application site is therefore considered the single most appropriate location to support service delivery through a new **15-metre** street pole, with 3no equipment cabinets typical of control boxes commonly found upon the adopted highway. Note, the pole and cabinets are proposed in a non-reflective fir green colour (RAL-6009), however can be painted to the requirements of the **London Borough of Richmond upon Thames Council**.

Figure 1 - Site Photograph's



Figure 2 – Extract from Google Street view (view looking west) from **Lower Mortlake Road**

Proposed location of a new mast shown with blue arrow – please note that we consider that a **15m mast in this location – to be coloured green as well as the cabinets will assimilate** into the immediate street scene given the presence of trees and lampposts in the immediate vicinity



Figure 3 – Extract from Google Street view (view looking east) from Lower Mortlake Road

Proposed location of a new mast shown with blue arrow – please note that we consider that a **15m mast in this location given the** presence of trees and lampposts, will assimilate well into the immediate street scene and not be detrimental.



The proposed site option is considered the best available compromise between extending 5G service across the target 'coverage hole' with the selected street works pole height and associated antenna and ground-based cabinets restricted to the absolute minimum of **15mtrs**, which is capable of providing the required essential coverage.

The equipment cabinets are located at the base of the new pole and (unless the site is located in Article 2 (3) land), such installations are deemed Permitted Development without Prior Approval and therefore do not form part of the proposal from a planning consideration perspective as set out in the undernoted planning analysis:

Planning Policy Relevant to the Development Site:

Development Plan Policy: National Planning Policy Framework (February 2019)

The relevant Local Plan against which the application will be determined, is The Richmond Local Plan was adopted in July 2018. This document replaced the Council's previous policies within the Core Strategy and Development Management Plan. The policies that are of relevance to any application for a new mast here are: -

Policy LP 1 – Local Character and Design Quality Policy LP 33 – Telecommunications

Policy LP 33

Telecommunications

The Council will promote the enhanced connectivity of the borough through supporting infrastructure for high speed broadband and telecommunications.

Applications for telecommunications development (including for prior approval under Part 16 of the General Permitted Development Order, or any other such future Order) will be considered in accordance with national policy and guidance and the following:

1. The applicant will need to submit evidence to demonstrate that all options for sharing of existing equipment, including with other operators, and erecting masts on existing tall buildings or structures, have been fully explored before considering the erection of new structures or facilities.
2. Visual impacts of telecommunications proposals should be minimised, in line with policies on Local Character and Design, particularly on roof tops.
3. The applicant has demonstrated that the development will operate within the International Commission on Non-Ionizing Radiation Protection Guidelines for public exposure.

8.6.1 National policy sets out guidance on the provision of high quality communications infrastructure, which is essential for sustainable economic growth. Modern telecommunications systems are an essential component in today's economy. It is recognised that there are parts of the borough which have poor mobile phone reception as well as broadband coverage, such as Ham and Petersham. High speed broadband technology will also enhance the provision of local community facilities and services. Therefore, the Council supports telecommunications infrastructure and high speed broadband that ensures the continued economic and social success of the borough, particularly as businesses and local communities rely on access to modern technology. This policy seeks to ensure that new telecommunications infrastructure is sited appropriately and that the number of sites used is minimised where possible.

8.6.2 It is important to keep the number of masts and sites to a minimum as an over-concentration of equipment and installations can have harmful impacts on the borough's unique and distinctive character. Therefore, there is an expectation that existing masts, buildings and other structures are used wherever possible, which includes sharing facilities with other operators, unless the need for a new site has been justified and accepted by the Council. Where new sites or structures are required, equipment should be sympathetically designed and camouflaged where possible. In addition, the Council supports the removal of redundant telecommunications infrastructure.

We have sought to comply with this within our application.

In this instance, a new **15mtr** high H3G Phase 8 street pole c/w a wrap-around cabinet with associated 3no. equipment cabinets (colour fir green RAL-6009) are to be positioned upon the adopted public highway; on an area of footpath, off Lower Mortlake Road outside the 'Kwik Fit' unit close to other existing street works and street furniture with trees in the vicinity, to reduce visual impact in a residential setting that is out with a conservation area or other such restrictive designation. The proposed site location is not considered to pose an undue onerous material consideration and favourable determination is invited.

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 pink dot RUT14752) and existing H3G (Three) UK sites are illustrated within Figure 4 below:

Figure 4 - Coverage Map: Proposed installation must be located close to reference to RUT14752 – pink dot below.



Type of Structure	
Description: Proposed Phase 8 Monopole c/w wrapround Cabinet at base.	
Overall Height:	15m AGL
Height of existing building	N/a
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Tower/mast etc. - type of material and external colour:	Phase 8 Monopole, colour Fir green RAL-6009
Equipment housing - type of material and external colour:	Profile steel cladding, colour Fir green RAL - 6009

Reasons for choice of design:
<p>The proposed installation is an H3G LTE (Three) 15m high Phase 8 Monopole c/w wrap-around cabinet and 3 no. additional equipment cabinets which will support the UK Government Digital connectivity vision and provide a basis for support from the London Borough of Richmond upon Thames Council 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.</p> <p>The COVID-19 pandemic has highlighted the need for improved connectivity and in particular 5G and the benefits it brings to communities such as working from home.</p> <p>In accordance with the requirement set within National Planning Policy Framework (February 2019) guidelines; the proposed 'Streetworks' design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture.</p>

4. Technical Information

ICNIRP Declaration attached		
<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	

5. Technical Justification

Reason(s) why site required

The National Planning Policy Framework (NPPF) clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this, the Applicant considers it to be important to explain the positive technical justification for the site and how the facility fits into the overall network.

The site is required to provide new 5G coverage for H3G LTE, improving service in and around the **Lower Mortlake Road area of Richmond**. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 50m.

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

Discounted Options

In accordance with the sequential approach outlined in the NPPF, the following search criteria have been adopted. Firstly, consideration is always given to sharing any existing telecommunication structures in the immediate area, secondly; consideration is then given to utilising any suitable existing structures or buildings and thirdly, sites for freestanding ground-based installations are investigated.

This sequential approach is outlined below:

- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPPF, all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Mast Data register is always examined prior to the submission of a planning application.

Discounted Options and National Planning Policy:

The National Planning Policy Framework (NPPF) is clear that LPAs should not question the need for the installation under Part 116:

“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure”.

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

DSA (Designated Search Area) is illustrated in Figure 5, together with site locations that were investigated and subsequently discounted.

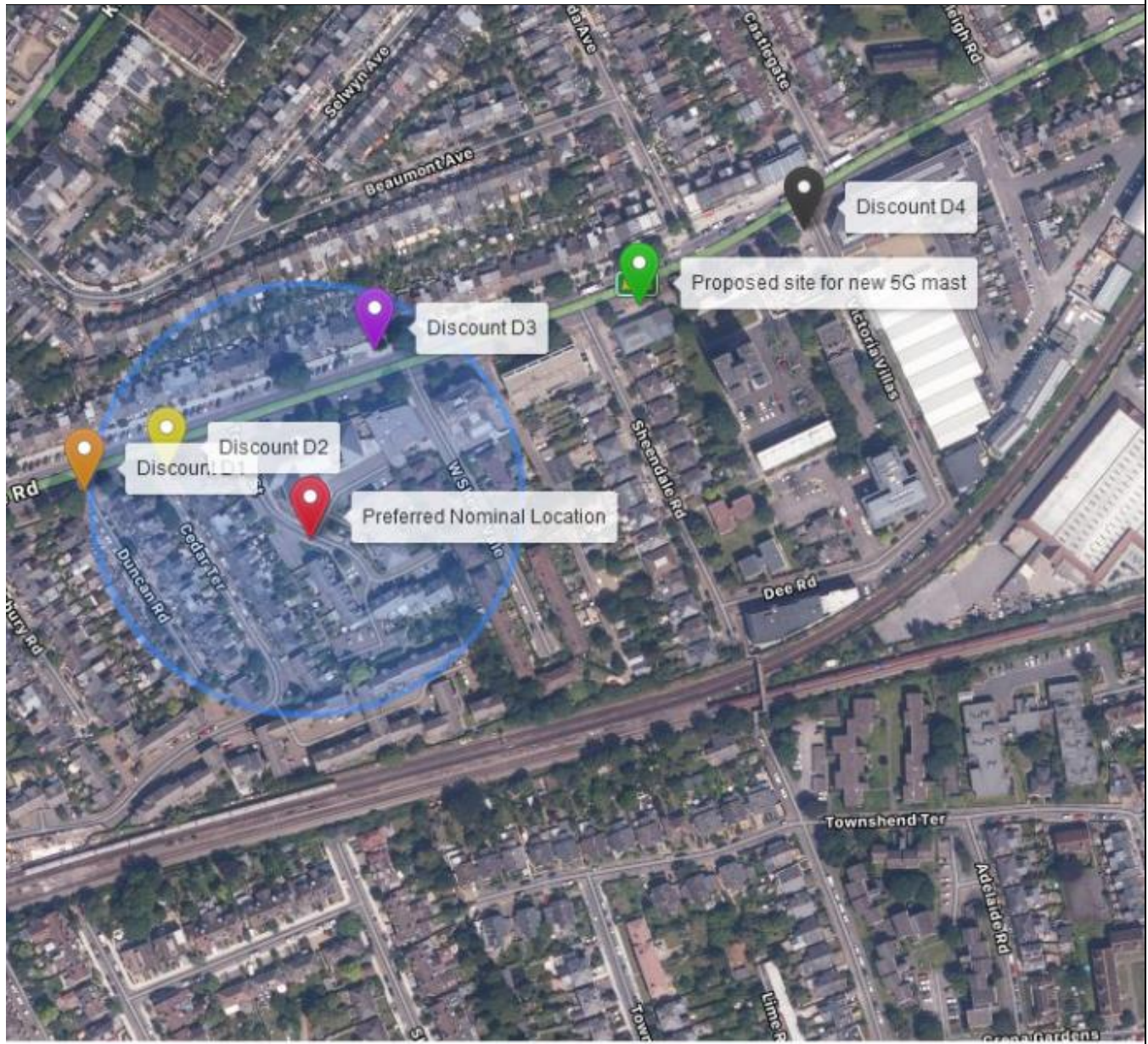
As this mast is a 5G installation, to work it needs to be close to those who will benefit from the technology, and this is why such a small search area is required here. Movements outside this area are likely to require a proliferation of masts to do the same job, and even then, we are likely to have coverage gaps. The DSA was focused along the busy A316 with residential properties lined up along the west side of the road, with more commercial properties towards the west of the road, with gradual size increases in the structures further west. A TfL red route runs along the A316 and part-way down some of the non-residential side roads to the point the commercial properties meet residential housing. The pavements that run along the A316 though wide, many portions are not suitable for placing a site due to the extensive services shown underground, this is especially obvious on the northern side pavement where the smaller shops have residential flats above, with water pipes running from the road into the flats, not leaving 6m of site available. The South side pavement has an issue with a cycle lane taking up half of the width and reducing clearance in a lot of parts. One site has been chosen outside of the Kwik-fit garage beside the bus stop.

Discounted Options:

As part of the requirement to show other potential sites we looked at but subsequently discounted, please see these below and also a map plotting them.

Site Reference	Reason why discounted
D1 – Lower Mortlake Road, close to junction with Duncan Road	The pavement here has footpath and cycleway with a grassed area and tall trees. This site discounted due to proximity of trees and the possibility of some damage to the tree roots.
D2 – Lower Mortlake Road, close to the junction with Cedar Terrace	The pavement here has footpath and cycleway with a grassed area and tall trees. This site discounted due to proximity of trees and the possibility of some damage to the tree roots. Also, potential issues with visibility of those egressing from Cedar Terrace.
D3 – Lower Mortlake Road, close to No.145 opposite entrance to West Sheen Vale	There is a wider section of footpath here where it may be possible to accommodate a new mast, however discounted due to proximity to residential and also taller building opposite.
D4 – Lower Mortlake Road, close to the junction with Victoria Villas	Proximity to locally listed buildings

Figure 5 - Proposed Site Location: 100m DSA and potential alternative sites for a new mast installation subsequently discounted



7. Additional Relevant Information

Background to the Proposal

H3G 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 London Borough of **Richmond upon Thames Council area and specifically in this instance, to enhance 5G coverage levels in and around the Lower Mortlake Road.**

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.

The proposed scheme has been designed to ensure the fundamental principles of good siting and appearance are adhered to. On this occasion we have chosen a site for the proposed installation on an existing footpath with trees and other vertical elements and street furniture. There are vertical elements within the immediate street scene – some trees and lampposts and therefore the overall impact of the installation on the environment is considered limited when viewed in the context that high-speed mobile connectivity is the lifeblood of a Community.

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 of November 2020 (Appeal Reference: APP/A5840/W/20/3254830).

Conclusion

Government considers that high-speed mobile connectivity is the lifeblood of a Community. H3G (Three) is committed to providing improved network coverage and capacity, most notably in relation to 5G services.

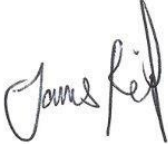
Taking into account the site-specific factors and technical constraints, available options and planning constraints, it is considered that the proposed 15m high street pole clearly represents the optimum environmental solution to extend coverage to the target Community.

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:	13 th January 2021
Position:	Planning Manager	Company:	Dot Surveying
		(on behalf of above operator)	