

**SUPPLEMENTARY INFORMATION**

1. Site Details

Site Name:	Westerham Road Lay-By Verge SW	Site Address:	Westerham Road Lay-By Verge SW, Westerham Road Lay-By Verge, Westerham Road, Westerham, Surrey, TN16 2EU
National Grid Reference:	E542623, N153319		
Site Ref Number:	99517	Site Type: <sup>1</sup>	Macro

2. Pre Application Check List

**Site Selection (for New Sites only)**

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	<b>Yes</b>	<b>No</b>
If no explain why: N/A		
Were industry site databases checked for suitable sites by the operator:	<b>Yes</b>	<b>No</b>
If no explain why: N/A		

**Site Specific Pre-application consultation with local planning authority**

Was there pre-application contact:	Yes
Date of pre-application contact:	31 August 2021
Name of contact:	Chief Planning Officer
Summary of outcome/Main issues raised:  Pre-application consultation was sent to Tandridge District Council via email on the 31 August 2021. It has been decided to proceed with a formal application as it is considered that the best design has been put forward in order to achieve the technical requirements of the site, and due to the technical constraints, that affect the design there is a limited scope to alter the appearance of the site to a significant degree.	

**Community Consultation**

Rating of Site under Traffic Light Model:	Red	Amber	<b>Green</b>
Outline of consultation carried out:  Pre-application consultation letters were sent by email on the 31 August 2021 to the Limpsfield Ward Councillors (Councillors Blackwell and Davies).  A pre-application consultation letter was sent by email on the 31 August 2021 to Limpsfield Parish Council.  A pre-application consultation letter was sent by email on the 31 August 2021 to Surrey County Council Highways.			

<sup>1</sup> Macro or Micro

Summary of outcome/main issues raised (include copies of relevant correspondence):

To date no comments have been received.

### School/College

Location of site in relation to school/college (include name of school/college):

A search of publicly available Department for Education and Ofsted records did not identify any educational facilities in proximity to the site location.

Outline of consultation carried out with school/college (include evidence of consultation):

N/A

Summary of outcome/main issues raised (include copies of main correspondence):

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	<b>No</b>
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	<b>No</b>
Details of response:  There are no airfields within 3 kilometres of the site.		

### Developer's Notice

Copy of Developer's Notice enclosed?	<b>Yes</b>	No
Date served:	8 September 2021	

### 3. Proposed Development

#### The proposed site:

The application site is the grass verge located on the northern side of the A25 Westerham Road, adjacent to the lay-by, between the villages of Limpsfield and Westerham. The immediate area is typical of a rural area with woodland, open countryside and residential land use surrounding the proposed site location. The whole of the surrounding area is designated Greenbelt, an Area of Great Landscape Value and an Area of Outstanding Natural Beauty.

In keeping with this kind of rural roadside environment, there is a variety of street furniture in the locality including lampposts, telegraph poles with overhead cables, street signs and mature trees.



**An aerial view of the application site**



**Application site**

The application site is designated an Area of Great Landscape Value, Green Belt and an Area of Outstanding Natural Beauty.

This application seeks the introduction onto this grass verge of mobile telecommunications infrastructure required to ensure continued provision of mobile services following the loss of an operational site from the network for reasons beyond the operator's control. That infrastructure comprises of a 20 metre high monopole with 6no. antennas and 2no. 600mm externally located dishes. The monopole would be accompanied by 7no. equipment cabinets along with development ancillary thereto.

**Prior approval is not sought for the equipment cabinets as they represent Class A permitted development under Part 16 of schedule 2 of the GPDO.**

Enclose map showing the cell centre and adjoining cells if appropriate:

Network information is provided separately within this application.

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

Description:

20 metre high monopole with 6no. antennas and 2no. 600mm dishes supported at 14.5 metres.

**FOR INFORMATION ONLY**

As detailed on the accompanying plan, 7no. equipment cabinets, permitted by Class A of Part 16, Schedule 2 of the GPDO are to be deployed. These do not form part of the application, but for information, their types and dimensions are as follows:

Overall Height:	20 metres
Height of existing building ( <i>where applicable</i> ):	N/A
<b>Equipment Housing: 1no. Wraparound</b>	
Length:	1.6 metres
Width:	0.75 metres
Height:	1.6 metres
<b>Equipment Housing: 1no. Mk5B Link AC</b>	
Length:	1.2 metres
Width:	0.6 metres
Height:	1.6 metres
<b>Equipment Housing: 1no. EE Wiltshire Mk2</b>	
Length:	2 metres
Width:	0.75 metres
Height:	1.85 metres
<b>Equipment Housing: 2no. BBU Cabinets</b>	
Length:	0.77 metres
Width:	0.7 metres
Height:	1.46 metres
<b>Equipment Housing: 1no. Bowler</b>	
Length:	1.9 metres
Width:	0.66 metres
Height:	1.82 metres
<b>Equipment Housing: 1no. Komodo</b>	
Length:	1.23 metres
Width:	0.4 metres
Height:	1.54 metres
<b>Materials (<i>as applicable</i>):</b>	
Tower/mast etc – type of material and external colour:	Galvanised Steel / Galvanised Suggestions on the colouring of the equipment used on site are welcome and will be considered if Tandridge District Council wishes to do so.
Equipment housing – type of material and external colour:	Steel / Fir Green (RAL 6009) Suggestions on the colouring of the equipment used on site are welcome and will be considered if Tandridge District Council wishes to do so.

Reasons for choice of design, making reference to pre-application responses:
<p>The choice of design is governed by two main factors; the context and visual amenity of the area; and, the technical requirements.</p> <p><b>Technical Objective and Technical Requirements</b></p> <p>The objective of this site is to ensure coverage to the area is replaced and enhanced, and disruption to the wider network is not caused, due to the decommissioning of a nearby telecommunications site at Moor House Sand Pits (99223). One replacement site alone cannot replace the coverage gap which will be left by the decommissioning of the existing site due to the geographical area the quarry is expanding into and so a further telecommunications site to the eastern side of the area is also required, Ballards Grass Verge SW (99223).</p> <p>When a site is decommissioned the obvious impact felt is the loss of coverage that that site provided however, it can also cause greater disruption to the wider network. This is because each site connects to another, that one to another and so on, so if one is decommissioned the impact can reach far further than the immediate consumers. The objective, and need, for a replacement site in this area is henceforth established and justified but will be explained further in Section 3 of this document. Section 4 further below justifies why the proposal site is the best suited for the placement of a telecommunications site.</p>

By way of background information, in designing a radio base station it is necessary to incorporate certain vital elements and to work around a number of technical constraints. There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signal(s), the supporting structure that holds the antennas in the air (or fixes them to a building or structure) and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units).

Other elements necessary for the base station to function are the power source (a meter in a cabinet or a generator on sites where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas, link dishes and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

The antenna height is determined by a specialist network radio engineer using specialist software which factors in the area that coverage is required, the relationship between the selected site location and existing cell sites in the linked network and variances in land levels amongst other things. Panoramic photographs are also taken at a series of increasing heights to determine the minimum at which nearby trees or buildings that could block or weaken signals can be cleared. In this instance, panoramic photographs show the surrounding trees at approximately 14.5 metres and so 20 metres has been calculated as the minimum structure height necessary in order for the dishes and lower set of antennas to clear the surrounding trees clutter in order for the signal not to be blocked. Please note that the panoramic photographs have been included with this planning submission.

The dishes will be placed at 14.5 metres high on the monopole where they can have clear connection to the core network – ensuring that seamless connection between the cells can be made above the tree line and any other obstructions. The antennas for this site are integrated into the upper section of the pole and will supply 2G, 3G, 4G and 5G connection for the area. An explanation into what exactly this means and the benefits provided will be given in Section 3 of this document.

7no. equipment cabinets are required to house the radio equipment.

#### Visual Amenity

The location of the site was heavily constrained by technical issues, as will be detailed in subsequent sections. The proposed site location is the grass verge on the northern side of the A25 Westerham Road within a rural area. The understanding of the rural context and character of the proposal site has led to the design choice of a slimline monopole kept to the minimum height technically required.

A monopole is best suited to these rural roadside settings because it is successful at blending in with the characteristics of these types of areas and appears much like other street furniture such as lamp poles, only taller. Although other options, such as industrial style monopoles or lattice towers, would be likely to have greater technical achievements, the slimline monopole was chosen by the applicant as it is considered more appropriate for this setting.

The antennas on the monopole are integrated into the pole itself, allowing for a slimline, linear and discrete look. Because of this, the monopole appears as one unified and simple modern pole, rather than having various antennas protruding from a bulky headframe, which arguably would appear more out of place and have a more significant visual impact upon the area. Again, the proposed monopole is an appropriate choice for rural roadside settings.

Given the location of this site within a grass verge surrounded by mature trees, it is proposed to colour the cabinets fir green to aid their assimilation into the grass verge and surrounding area. It is proposed that the monopole remain grey in order to reduce the capacity of the equipment to draw the eye when viewed against the sky. If an alternative colour would be preferred by the Council suggestions are welcome and will be considered.

It is acknowledged that the development would be visible from public views, however, due to the curvature of Westerham Road and the intervening mature trees these views would be limited and in particular the views from surrounding residential properties, none of which directly overlook the application site, would

also be limited, and so the proposal would preserve the particular significance of the surrounding Greenbelt, Area of Great Landscape Value and the Area of Outstanding Beauty and their settings. It should be noted at this stage that as the proposal constitutes permitted development and is subject to prior approval from the local authority the criteria for assessing the proposal is in relation to siting and appearance only and not the principle of the development.

It is for the design choices listed within this section that the proposed development is of good and sensitive design and will not cause visual harm or unacceptably alter the visual amenity of the area. The design of this proposal will allow the development to blend in with the scenery and other street furniture and vertical elements, rather than incongruously stand out.

Due consideration has been given to the process and this proposal put forward is the best available option – it both achieves the technical requirements and does not bring unacceptable harm to the character of the area. The guidance given by the Government on the balance Local Authorities must take between these two factors – technical achievements of telecommunications developments and visual harm – will be clarified in section 4 of this document under ‘Policy’.

Technical Information

<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)</p> <p>International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.</p> <p>When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, EE and Three operate their networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p> <p>As part of EE and Three's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>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.</p> <p>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.</p>	<p><b>Yes</b></p>	
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### 3. Technical Justification

#### Reason(s) why site required e.g. coverage, upgrade, capacity

The proposed site is required as a replacement rather than an additional base station within the area. EE and H3G (known as the operator Three) have a radio base station located at Moor House Sand Pits which the operators are having to vacate due to expansion of the quarry. Therefore, replacement base station locations are required in order to ensure continued provision of network services within this cell area.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV and downloads. The base stations are connected to each other and by cables or wireless technology to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. There are several variables that determine the size and shape of each cell.

Because base stations are low powered radio transmitters they each have a limited range, meaning that they generally need to be located close to the area requiring coverage. If one moves too far away from that area then it is likely that some areas will remain without the services they previously enjoyed.

When an existing site is lost from the network it leaves a very specific “gap” in coverage within the established network pattern which needs to be filled. The consequence of not doing so is that users of the network find that the services they previously had access to are either limited or removed.

High quality communications infrastructure is essential for sustainable economic growth and that high speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.

The UK Government recognises the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public’s overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

The Digital Infrastructure Minister, Matt Warman, in his keynote Speech at the Connected Britain Conference 2020 referred to the internet as the “*fourth utility*” and went on to state that “*for countless people across the country, having fast and reliable broadband and a good mobile connection is as essential and vital to our daily lives as gas, water and electricity*”. He went on to acknowledge the importance of connectivity during the Covid pandemic, “*The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown – and is now more important than ever as we head into recovery*” and also recognised that “*changes such as increased working from home will stay with us for the foreseeable future*”.

The Planning Inspectorate too has in recent years continually recognised the importance of this issue and cited it in appeal decisions that have overturned the decisions of local authorities across the UK where there has been a failure to apply due weight to the value of connectivity to social and economic prosperity in the assessment of applications made for telecommunications development, even in protected or sensitive areas. As an example, in October 2018 the decision of Winchester City Council to refuse prior approval for the installation of a 17.5m high monopole and associated equipment housing, required to replace an established site being lost from Vodafone’s network, was overturned by the Planning Inspectorate (CTIL and Vodafone Vs Winchester City Council, appeal reference APP/L1765/W/18/31975). Within the decision notice, the Inspector stated that:

*“I attach significant weight to the public benefit arising from the continuation of local service provision.....Having regard to all relevant considerations.. my findings are that the proposal’s public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area”.*

A similar circumstance exists in this case, with the application proposal required to prevent the loss of services on two networks, a matter certainly in the public interest.

In March 2020, the decision of Birmingham City Council to refuse planning permission for the replacement of a 12.5-metre-high monopole with a 20-metre-high monopole was overturned by the Planning Inspectorate (EE Ltd and H3G UK Ltd Vs Birmingham City Council, appeal reference APP/P4605/W/19/3241791). Within the decision notice, the Inspector stated that:

*“The proposed upgrade would contribute to delivering a modern, advanced, high quality and reliable communications infrastructure... It follows that the upgraded mast would support economic growth and the local community by enabling fast and reliable communication to take place, for example by helping people gain employment, access services, support their health and well-being, whilst also assisting new technologies.*

*In this case, the proposed development would result in harm to the visual amenity of the area, with particular regard to the proposal’s scale and siting... However, I conclude that this harm would, on balance, be outweighed by the economic and social benefits that would stem from the proposed upgrade which would not be realised whilst reducing the height of the mast”.*

It is considered that when the balancing method advocated in the NPPF is applied to the proposal, where the need and significant public benefit of ensuring continuous network coverage is provided, especially given the current global pandemic, is balanced against the appearance and level of associated visual impact of the proposed site, that the application proposal is positively in favour and is considered wholly appropriate.

In recent years, there has been an increasing number of telecommunications appeal decisions which have been overturned by the Planning Inspectorate.

To emphasise this point, the following rooftop scheme which was originally refused by the relevant Local Planning Authority, but subsequently overturned by the Planning Inspectorate, is detailed below.

In May 2019, the decision of the Royal Borough of Kingston-upon-Thames Council to refuse planning permission for the replacement of a 2no flagpole antennas with 3no antennas on the new raised roof level was overturned by the Planning Inspectorate (EE Ltd and H3G UK Ltd Vs the Royal Borough of Kingston-upon-Thames Council, appeal reference APP/Z5630/W/19/3221200). The appeal site, 145-155 Ewell Road, is situated within the Oakhill Conservation Area, and within the setting of locally listed buildings. Despite this, within the decision notice, the Inspector stated that, in reference to the proposed antennas:

*“Their visual impact is consequently quite localised to the immediate vicinity of the appeal site, but where they are visible, they are prominent. When seen in this visual context and commercial urban setting and atop a modern building which is itself different from the wider character and appearance of the area, I am satisfied that the antennas would not appear out of place”.*

*“The antennas are located on a building adjacent to and close to locally listed buildings. While the full height of the antennas can be seen alongside these buildings, their position on the roof top of an already contrasting and considerably taller, modern building limits their impact on the setting of these buildings whose visual interest is largely experienced at street level.*

*I therefore conclude that the development does not harm the character and appearance of the area or the significance of the CA or the settings of locally listed buildings nearby. As such the character, appearance and significance of the CA would be preserved”.*

Ofcom’s Communications Market Report 2018 provides a figure of 92 million active mobile subscribers in the UK at the end of 2017. It details that 78% of adults now use a smartphone and that 76% of mobile users are using their devices for web and data access. Figures within the report also confirm that users are spending an increasing amount of timer per day using their mobile phone. 68% of participant in the Touchpoints research reported that they “could not live without” their mobile phone (rising to 78% among

25-34s). Whilst not included within the research figures, anecdotal evidence suggests that this number is greater still amongst those aged under 18. All of which points towards the nations increasing dependency on mobile services and connectivity.

As recognised by the London Assembly's Regeneration Committee within its "*Digital Connectivity in London*" report, published June 2017, digital connectivity is now widely regarded as the "*fourth utility, an everyday necessity alongside water, gas and electricity*" and also noted that "*mobile broadband is, and will continue to be, an essential complement of fixed broadband*". It is no longer a luxury, but a service essential to modern life.

The loss of services on two major networks at a time when reliance on connectivity services is a fundamental part of every day is simply unacceptable. The site within the grounds of Moor House Sand Pits was originally built in 2003. This means that the villages of Limpsfield and Westerham and the surrounding area would regress 18 years when it comes to connectivity when the existing site is removed, which is not acceptable when connectivity is more important than ever and would be contrary to both national and local planning policy

As introduced above in Section 3 of this document, the objective of this site is to ensure coverage to the area is replaced, and disruption to the wider network is not caused, due to the decommissioning of a nearby telecommunications site (Moor House Sand Pits).

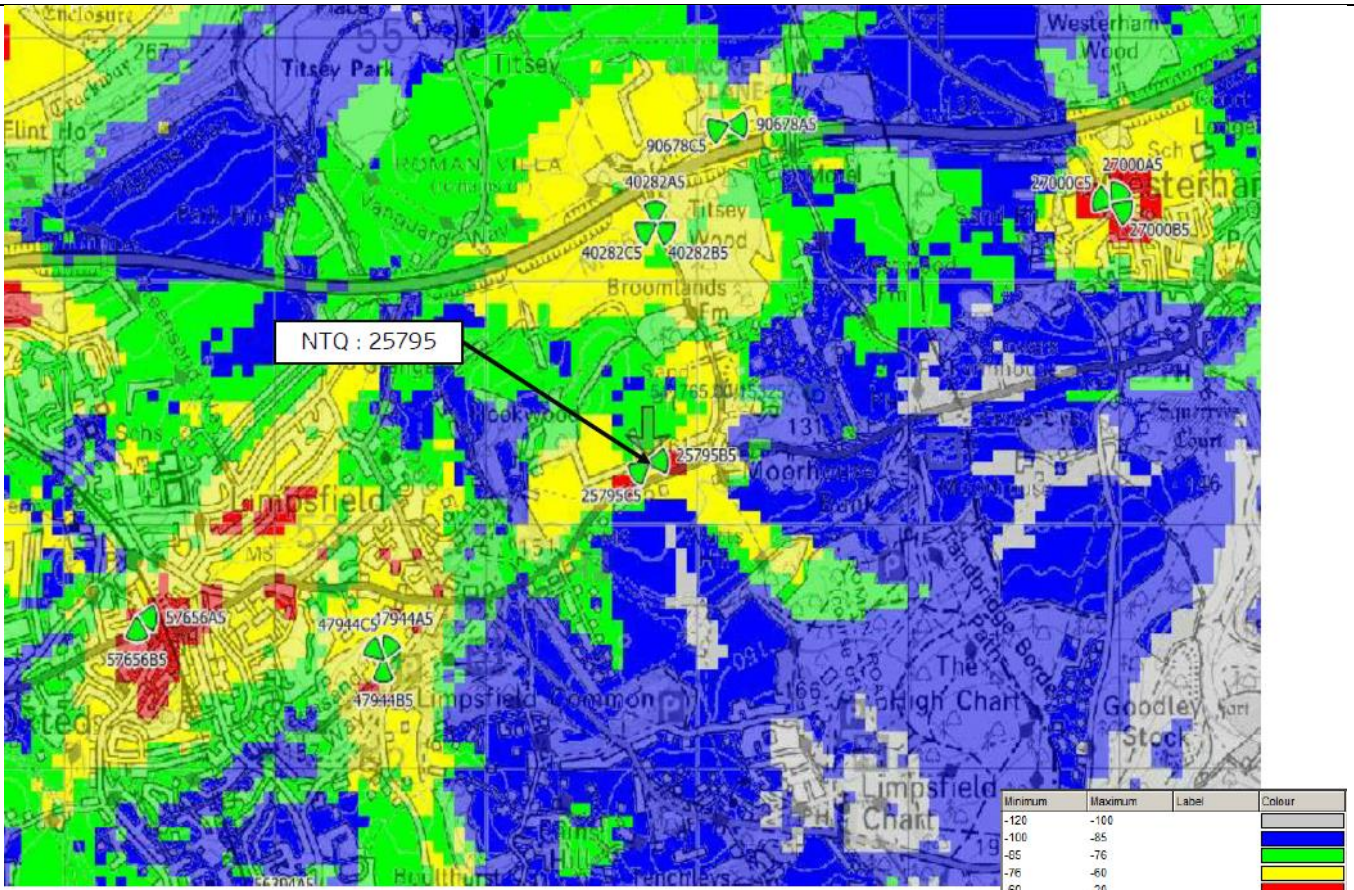
The installation of this proposal will enable 2G, 3G and 4G.

2G was the second generation of cell phone transmission, it introduced data services for mobile, starting with SMS text messages.

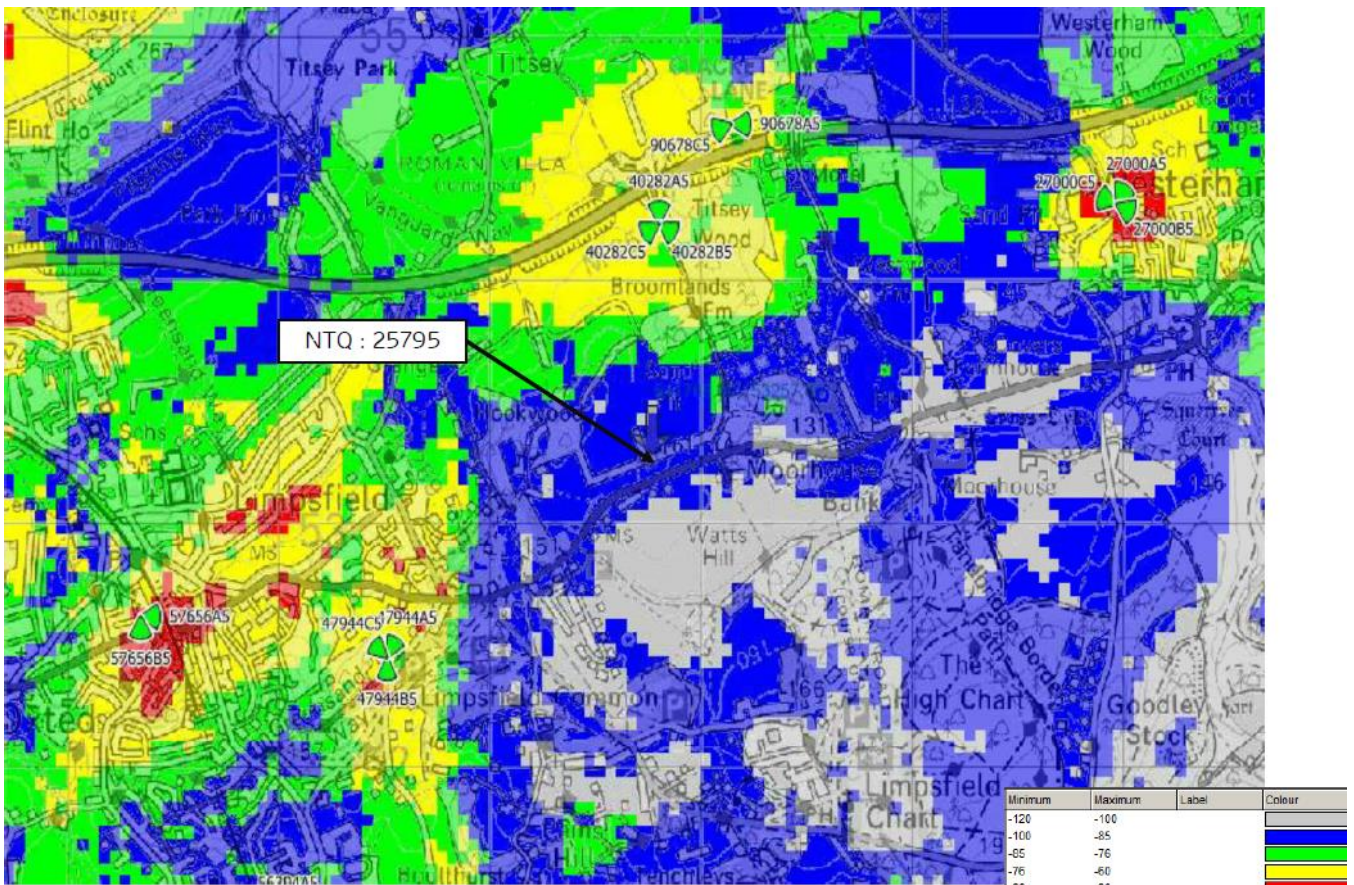
3G was an extension to this and enabled the use of data. The main technological difference that distinguishes it from 2G technology is the use of packet switching rather than circuit switching for data transmission. Increased data rate to a minimum of 2 Mbit/s for stationary or walking users, and 384 Kbit/s in a moving vehicle.

Similarly, 4G was another extension and enabled an increased speed in connection. It Supports a minimum data rate of 1 Gbit/s for stationary and 100 Mbit/s for mobile operation. In simple terms the benefit to users is that 4G that supports mixed data, voice, video and messaging traffic at significantly faster speeds than 3G. This results in ultra-fast internet browsing, video streaming, gaming, e-mail and downloads. In simple terms 3G allows for data transmission as well as text services as mobile phones, computers and other portable electronic devices access the internet wirelessly. EE will become the Emergency Services Network Provider and their 4G network will be utilised for this purpose. During the current climate it is even more essential to maintain all current services for not only current users but for the emergency services also.

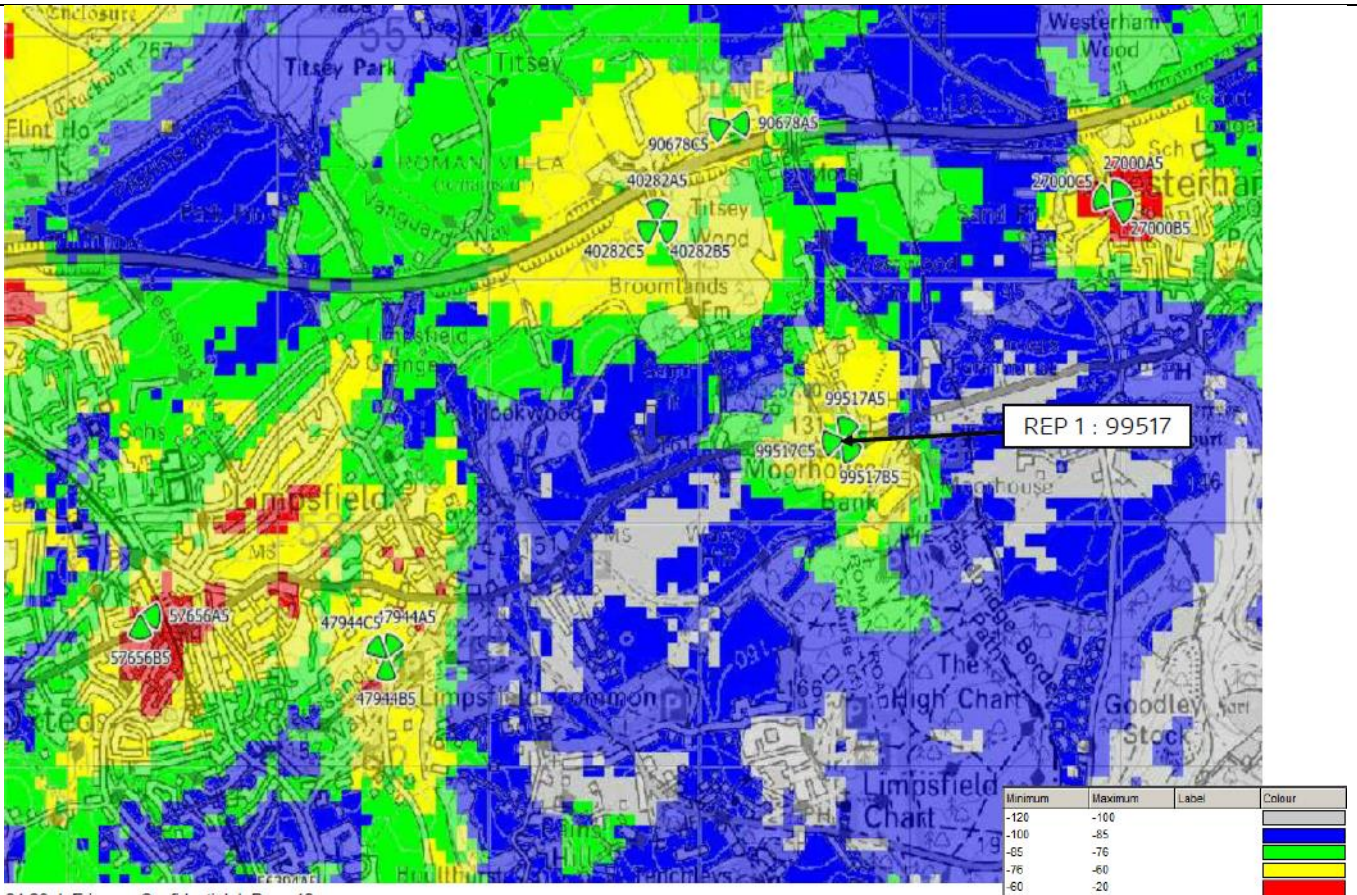
Images 1 through 3 below show the 3G outdoor coverage with the existing site (Moor House Sand Pits), without the existing site and with the proposed replacement site for Three. Images 4 through 6 below show the 4G indoor coverage with the existing site (Moor House Sand Pits), without the existing site and with the proposed replacement site for EE. As evident, 3 and EE will lose 3G outdoor and 4G indoor coverage when the existing site is decommissioned. The proposal site would go some way to replacing the lost coverage for 3G outdoor and 4G indoor and it would contribute to increasing the geographical area and capacity for which coverage can be provided where services currently do not reach.



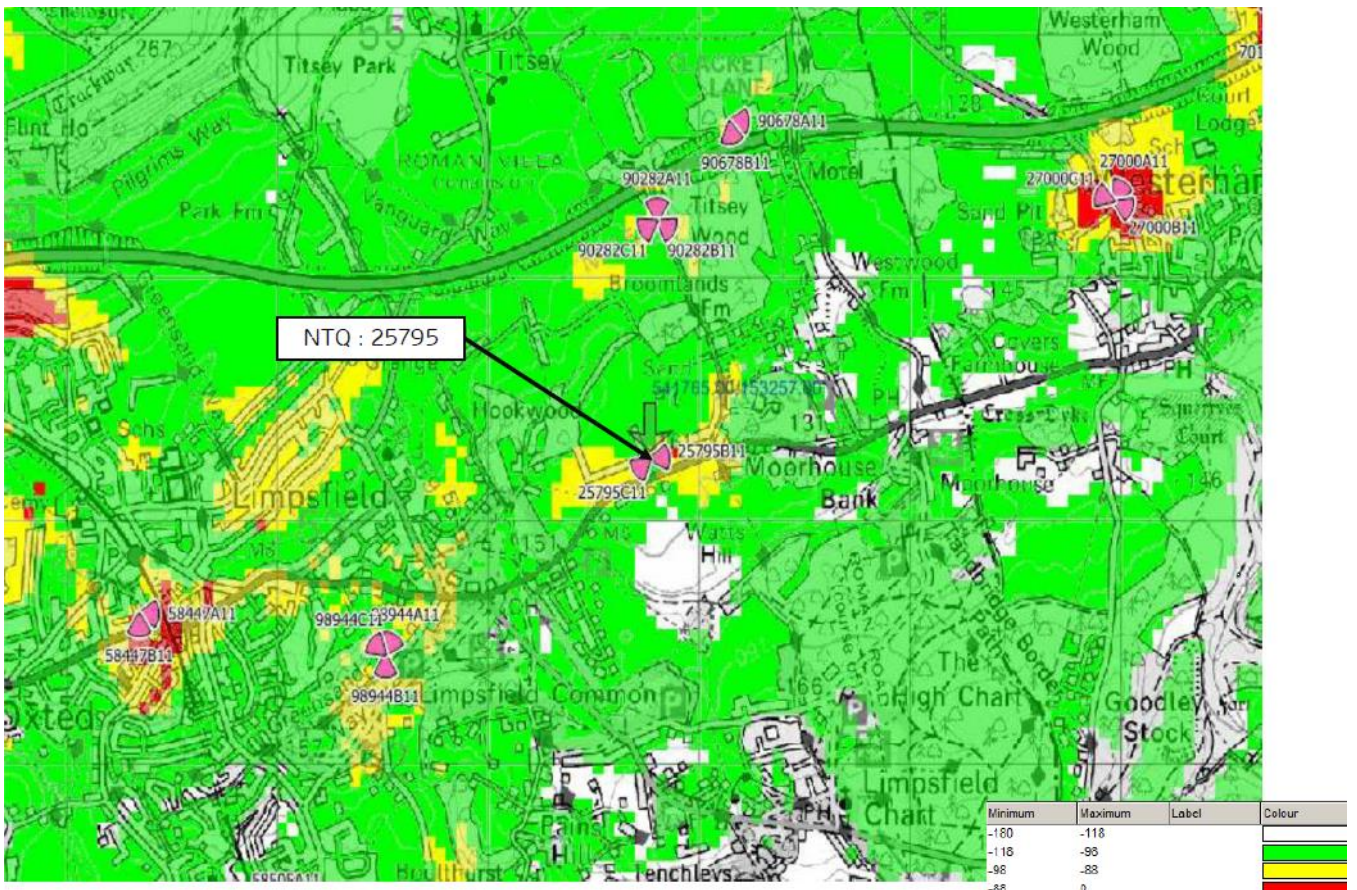
1. 3G outdoor coverage with the existing site for Three



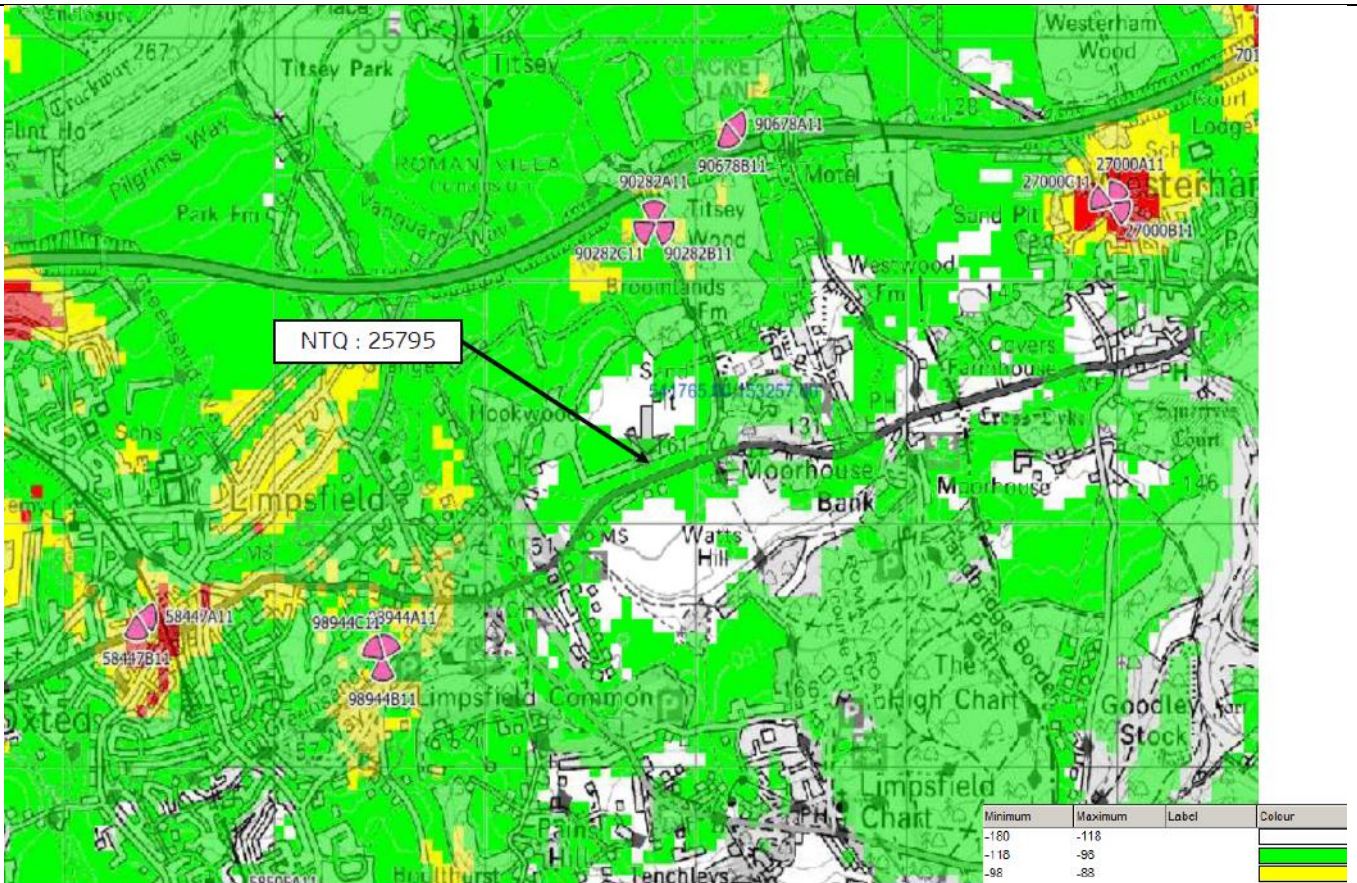
2. 3G outdoor coverage without the existing site for Three



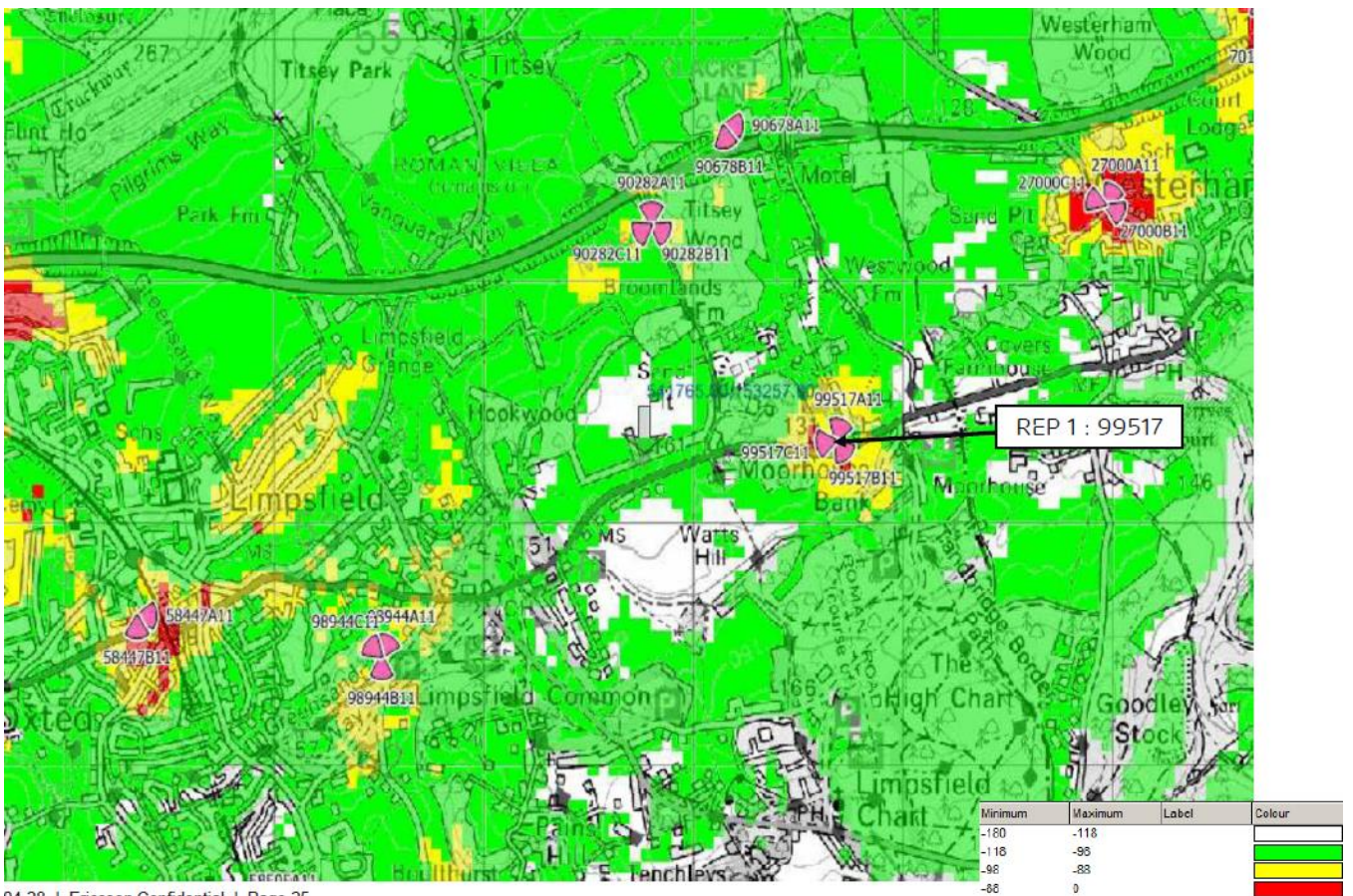
3. 3G outdoor coverage with the application site for Three



4. 4G indoor coverage with the existing site for EE



5. 4G indoor coverage without the existing site for EE



6. 4G indoor coverage with the proposed site for EE

As evident from the future coverage shown within the coverage plots for EE and 3, the proposed application would go some way to successfully achieve the technical requirements and objectives. Please note that full coverage plots for EE and 3 have been submitted with this application which also show how the application site will provide enhanced and extended coverage to Limpsfield, Westerham and the wider area.

It is worth noting that the plots show only the geographical reach of coverage. Capacity, the volume of call and data traffic that can be handled by any one base station at a given time, does not display on the plots. However, this is a critical network consideration and especially important in high traffic areas with large populations where call & data volumes are higher and cell areas often smaller due to the density of development. Indoor coverage provision is imperative across the UK, arguably more so within commercial and residential areas where connectivity plays a particularly vital role in commerce. Without the installation subject to this application, the vital indoor levels, which allow customers to access services from within buildings, would simply not be achieved. It is particularly vital in this case given the site is in close proximity to the villages of Limpsfield and Westerham.

At a local level, this installation allows for an increase in home working, by providing the opportunity to create a “virtual office”, reducing the need to travel for work as a consequence, which is helpful in supporting the sustainable development agenda in line with Tandridge’s policies (as discussed below).

It is therefore very important for ‘mobile only’ households that live and work and any businesses that operate in this part of the LPA’s area, together with visitors and others who are staying in or travelling through the area, that the necessary indoor RF coverage is provided to enable them to have satisfactory mobile telephone and internet access.

On a wider scale, the proposal would contribute towards the country’s connectivity and digital economy future. Mobile telecommunications are vital for the UK’s economic competitiveness and in promoting social inclusion.

The very high level of mobile phone use and ownership within the UK population is a clear indication of the public’s overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

Ofcom’s 2018 Communications Market Research Report shows that smartphones are owned by four of every five UK consumers and smart TVs are in almost half of all households. Demand for data continues to grow rapidly for UK consumers, with 1.9GB consumed by an average mobile subscription per month in 2017, (up from 1.3 GB the previous year). The report found that more than seven in ten now use their mobile to access the internet, sufficient coverage is obviously vital for this basic utilities service to be provided.

As outlined within this application, our reliance on mobile networks has steadily increased over time, with a significant acceleration of this reliance in 2020, during the two national lockdowns. Statistics provided in the Ofcom Connected Nations 2020 UK Report states that mobile data consumption increased by 42%, when compared to 2019. Additionally, traffic carried in England in June 2020 (during lockdown) exceeded that carried across the whole of the UK (England, Scotland, Wales, Northern Ireland) in February 2020 (prior to lockdown).

There is a clear need for retention of existing services as the way people lead their lives is changing, as our dependence on these mobile networks increases. The Covid-19 pandemic has seen a return to homeworking for a considerable proportion of the Country’s workforce; the conducting of business meetings and attending conferences online; grocery shopping online; people video-calling family members and friends that they cannot physically visit. However, the need for this replacement site is not driven by the Covid-19 global pandemic, but rather our increased dependence on Operator networks that has grown year-on-year.

#### 4. Site Selection Process

There are specific constraints associated with site placement in mobile network planning. It has already been touched upon that radio base stations can each only cover a limited geographical area known as a cell and that cells are designed to overlap to form an unbroken network. Site placement is always critical in network planning and becomes even more so when one is seeking to replace an existing base station already operating within the established cellular pattern. When an existing site is lost it leaves a very specific and unique gap in the network, much like removing a piece from a completed jigsaw would, which needs to be re-filled if users living and working within that area are to be able to continue to use their mobile phones and other wireless devices. This places even greater limitations on the potential siting opportunities as many locations will not enable this specific gap to be adequately filled.

Prior to selecting the proposed site, a comprehensive investigation was undertaken by the applicant's network planners, acquisition and planning agents to find a site specifically capable of replacing that at Moor House Sand Pits. Potential sites are considered in terms of their technical suitability to provide the required level of service, the effect on visual amenity and their ability to be acquired, built and maintained. The aim of site identification is to find the most technically efficient site, which has the minimum impact on visual amenity. Various options might theoretically be suitable in terms of one of these considerations, but not the other. A balance between the two must be achieved.

The area from within which a site will be capable of providing the desired replacement coverage, the "search area", is determined by the network radio planners. In this case that area is located to the east of the existing site at Moor House Sand Pits and it is mainly rural in nature. The area is entirely located within Greenbelt, an Area of Great Landscape Value and an Area of Outstanding Natural Beauty within which the existing site within Moor House Sand Pits is located.

#### Alternative sites considered and not chosen:

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
Streetworks	Moorhouse Sand Pits, Brooklands Lane, Oxted, Surrey, TN16 2EU	E541745, N153200	This option is located within Greenbelt, an Area of Great Landscape Value and an Area of Outstanding Natural Beauty. This was the original replacement for the existing site, however, the land is owned by the owner of the existing site and has confirmed that the land is no longer available due to the quarry expansion.
Streetworks	Broomlands Lane Verge, Oxted, RH8 0SW	E542076, N153279	This option is located within Greenbelt, an Area of Great Landscape Value and an Area of Outstanding Natural Beauty. There is insufficient room within the grass verge to locate the required equipment. Furthermore, it is located too far west to provide the required replacement coverage to the western side of the existing site.
Streetworks	Verge adjacent to Allotments, Westerham Road, Westerham, TN16 2EU	E541452, N152988	This option is located within Greenbelt, an Area of Great Landscape Value and an Area of Outstanding Natural Beauty. This location is more exposed than the application site due to the lack of



			natural screening from mature trees and is therefore deemed an inferior town planning option. Furthermore, it is located too far west to provide the required replacement coverage to the eastern side of the existing site.
Greenfield	Area North of the A25 Westerham Road, TN16 2EU	E542838, N153585	This option is located within Greenbelt, an Area of Great Landscape Value and an Area of Outstanding Natural Beauty. This option is owned by the same owner as Moor House Sand Pits who has confirmed that the land is not available.
Greenfield	Area South of the A25 Westerham Road, TN16 2ES	E543032, N153102	This option is located within Greenbelt, an Area of Great Landscape Value and an Area of Outstanding Natural Beauty. This option is located within an Area of Outstanding Beauty which the application site is not and it is located too far south to provide the required replacement coverage to the western side of the existing site.

If no alternative site options have been investigated, please explain why:

N/A

Additional relevant information (include planning policy and material considerations):

**Environmental Information:**

The application site is not located within an identified protected habitat or protected species area. The proposal will subsequently not have any potential negative impacts on any sensitive habitats or species. Furthermore, a check of the Environment Agency website has confirmed the site is not located within a flood risk zone.

As far as practicable the proposed development has been designed to keep to a minimum the impact on amenity and the design of the development ensures there would be only a limited impact which would not be sufficient to harm visual amenity.

**Siting and Appearance:**

This section should be read in conjunction with the policy assessment below. The proposed site is located on a grass verge on the northern side of the A25 Westerham Road. The specific placement of the site has been chosen as it benefits from adjacent trees and a grass verge along with it. To an extent the siting of the equipment has been dictated by the services and utilities located within the grass verge. Any visual impact when viewed from the public realm would be mitigated by distance and intervening trees as well as the curvature of Westerham Road. Furthermore, other vertical elements within the street scene would mean that the monopole would not represent an incongruous addition and so the character of the surrounding area would be preserved.

It is expected that the monopole would be visible from the public realm, that being said, it has been argued that this visibility would not cause any harmful impact and the design and placement of the

monopole is best suited to blend into the area. It is acknowledged that the structure would be visible but that the harm is less than substantial and would not outweigh the public benefit.

The monopole itself is slimline and the equipment cabinets would be arranged in a neat row. Both of these factors would prevent clutter and aid the base station to assimilate into the surrounding area and with other street furniture in the locality such as lighting and telegraph poles.

In terms of appearance, it has been detailed in preceding sections that the type of structure proposed was specifically designed to be deployed in these types of roadside rural locations and to blend with standard pieces of street furniture such as lamp columns, security camera poles, sign posts, other telecoms installations and trees. They are now largely accepted as being ordinary elements of street scenes and so have increasingly less capacity to draw the eye.

This view is one that has long been supported by the findings of the Planning Inspectorate. As early as 2005, in overturning the decision of Southampton City Council to refuse consent for a 15m high monopole and associated equipment housing, the Inspector stated:

*“The proposed monopole would be clearly visible rising from the pavement in what is undoubtedly a prominent location. However, it is also a location where vertical structures are an existing and evident feature of the street scene and it must be taken into account that telecommunications masts are becoming commonplace features on roadsides in urban areas such as this one”* (APP/D1780/A/04/1162049 - H3G Vs Southampton City Council).

In the sixteen years since the above appeal was determined, roadside telecommunications infrastructure has become more commonplace still, increasingly so as the dependence on mobile technology has risen. The very high level of mobile phone use and ownership within the UK population, as is referred to in “The Communications Market” report quoted in section 4 of this statement, is a very clear indication of the public’s overwhelming acceptance of the benefits of mobile communications. The amount of infrastructure required to keep up with demand has also increased and in doing so has become more commonplace.

In terms of heritage assets, the NPPF notes the following in paragraph 192 and 193:

*“In determining planning applications, local planning authorities should take account of:*

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness.”*

*“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be.)”*

The applicants recognise the importance of retaining the key features of the surrounding area and due care has been taken to avoid harm to these features and it is submitted that the proposal respects the context of the site and avoids any material or unacceptable harm.

While the applicants do not suggest that the proposed will have no impact, it is considered that when applying the balancing method advocated in the NPPF, the proposal finds itself in favour. It is important to keep the impact of telecommunications development in the area to a minimum and it is considered that the proposal achieves this. The benefits of the proposal however also need to be considered. In this case the public benefit from retained and improved connectivity and wireless communication services.

This has been emphasised by the Planning Inspectorate on a number of appeal cases where, the planning inspectorate has ruled in favour of proposed developments of a similar nature, where this balance was applied. Some recent examples of where this balance was applied by the Planning Inspectorate include appeal cases referenced APP/Q3305/W/18/3206555 and APP/L1765/W/18/3197522. Extracts from these appeal decisions are included below for your convenience:

*“In considering the need for the proposal, Government policy, as set out in the Framework states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. In this respect, I have found that there is a need for the proposal which therefore weighs strongly in its favour. As I have found that the level of harm relating to this second main issue would be low, that identified need would outweigh the harm in this case.”*

*“I conclude on this issue that despite the less than substantial harm that would be caused, the public benefits of the proposal would outweigh that harm.”*

*“9. The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at 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... The Council has commented that service provision would be ‘adequate’ without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision.”*

*“13. Having regard to all relevant considerations, including national planning policy and the potential availability of alternative sites, my findings are that the proposal’s public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area.”*

Whilst each application needs to be assessed on its own merits, the above appeals (along with a growing number of others) indicate a growing trend, based on national policy and guidance, to favour important utilities infrastructure developments in the wider public interest when the potential harm is outweighed by the important and unavoidable public benefits they provide.

The selected siting is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding harm to the surrounding area. Although the structure would be visible, the impact would not be excessive and on balance this proposed location is considered to be the optimum location in terms of siting and design, with the limited harm it may impose on the surrounding area being outweighed by the provision of enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact.

### **Planning Policy Context:**

#### **National Planning Policy Framework (2021) (NPPF)**

The National Planning Policy Framework came into force in July 2021 replacing the guidance originally published in March 2012 and subsequently updated in July 2018 and February 2019. The NPPF sets out the Government’s planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states “*The purpose of the planning system is to contribute to the achievement of sustainable development*”, and in paragraph 10 that “*at the heart of the Framework is a presumption in favour of sustainable development*”. In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

*“a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*

*c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

For decision-taking (paragraph 11) this means:

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

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

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

The application proposal would allow the continued provision of reliable mobile communications services to the Limpsfield and Westerham areas, which brings about substantial public benefits both socially as well as potentially allowing for businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the ‘*virtual office*’, thus reducing the need to travel and contributing to the sustainability agenda. The loss of these services, where a wholly suitable option is available to prevent it by allowing for provision of replacement infrastructure, goes against the aims of the Government as expressed within the NPPF.

The NPPF directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA’s strategic policies must make sufficient provision for:

*“b) infrastructure for transport, **telecommunications** (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)”*

Leading on from this, paragraph 114 states that *“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections”*. Again, the proposal is entirely consistent with the aims expressed within the NPPF.

It should be noted that paragraph 118 states that “*Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure*”. A certificate of compliance with ICNIRP guidelines is included within this application.

Not specifically related to telecommunications development, paragraph 199 of the NPPF is relevant in that it addresses development that might potentially affect a heritage asset, specifically those that would result in “less than substantial harm”.

The NPPF is clear that that harm should be weighed against the public benefits of the proposal. It is stated in section 4 of this statement that the Planning Inspectorate has in recent years continually recognised the importance of connectivity. When applying the balancing exercise encouraged at paragraph 196 of the NPPF the Inspectorate has found in multiple cases that the provision, or prevention of loss to existing services can outweigh less than substantial harm to heritage assets.

In determining one such appeal, brought operator Telefónica (O2) against the decision of the London Borough of Harrow to refuse prior approval for the installation of a 12.5 metre high monopole with shrouded antenna section and accompanied by an equipment cabinet on a roadside verge in the urban area of Harrow-on-the-Hill (appeal reference APP/M5450/W/17/3180345, determined in December 2017), the Inspector concluded that:

*“The proposal would be permitted development and provide public benefits in extending the telecommunications capacity of the area. In applying the balancing test of paragraph 134 of the Framework, I consider that these benefits outweigh the harm that would arise from the proposal’s impact on the character and appearance of the Conservation Area”.*

These findings were echoed by the Inspectorate in determining a further case brought by the same Appellants against the decision of the London Borough of Hillingdon to refuse planning permission for a 15 metre high monopole with shrouded antenna section and associated equipment housing at a roadside location within the urban area of West Drayton (APP/R5510/W/16/3143922, 2016).

The Inspector concluded:

*“The Framework sets out the importance of an advanced high quality communications infrastructure for sustainable growth and makes specific reference to the development of high speed broadband technology. This is reflected in the London Plan and the public benefit arising from the improvement of the telecommunications infrastructure is a material planning consideration that weighs in favour of the proposal.*

*Taking account of all matters I have concluded that the limited harm caused to the significance of the heritage asset (the CA) would be outweighed by the public benefit that would arise from improving the communications infrastructure”.*

In both cases cited the developments were new base station installations proposed within Conservation Areas and it was determined that they would give rise to a degree of harm to the heritage asset in question. Despite this, the importance of providing a quality communications infrastructure was recognised by the Inspectorate and awarded due weight in the determination of the cases brought. That weight was sufficient for both appeals to be successful despite the recognised harm. In the case of this application, the same public benefit occurs, albeit the site is located within an Area of Outstanding Beauty and Green Belt, but the principle remains the same.

## **Local Guidance**

Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires

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

For the purposes of Section 70, the current adopted development plan for Tandridge District Council, relevant to the proposal, comprises:

- Tandridge District Core Strategy (15 October 2008)

Policy CSP 18 Character and Design – this policy seeks to encourage high standards in design which also reflect the character and setting of the local area. The proposal complies with this policy in that a sympathetic design would be utilised which is a common and accepted feature within this type of rural roadside location as it is a linear structure similar in shape to other surrounding vertical structures. The site location benefits from mature trees and shrubbery, and this, in combination with the minimal design means the site would be assimilated into the existing landscape when viewed from the surrounding area and so there would be no negative impact upon the local amenity.

Policy CSP 20 Areas of Outstanding Natural Beauty – The aim of this policy is to conserve and enhance the natural beauty of the landscape. A design has been utilised that would best mimic existing linear elements in the landscape, such as the surrounding telegraph poles, and the height has been kept to a minimum in order to prevent a bulky intrusion into the skyline. The site would be set back from the road in amongst the existing mature shrubbery and trees, which would also provide excellent screening. The site would not be viewed by surrounding residential properties as the road is lined by mature trees which will not only provide screening but also context. This means that the special landscape character, heritage, distinctiveness and sense of place would be conserved whilst also maintaining and enhancing connectivity to the local area for the public benefit.

Policy CSP 22 The Economy – This policy lays out how the council seeks to develop a sustainable economy. One of the criteria in this policy to achieving this aim is to encourage working from home. This proposal would directly support and empower this aim by increasing and maintaining the number of residents who are able to gain or receive improved connection – for mobile phone and data connectivity.

## **Tandridge Local Plan Part 2: Detailed Policies (2014-2029)**

Policy DP6: Telecommunications Infrastructure – The proposal complies with this policy in that this would be a replacement site and not a new site and would also involve EE and Three site sharing. Furthermore, as noted in preceding sections of this document, due to the sympathetic nature of the design combined with the surrounding mature trees and shrubbery, means the site would appear a congruous addition within the existing landscape thus the character and visual amenity of the area will be preserved.

Policy DP10: Green Belt – The land where the existing site is located is included in a planned expansion of quarry operations. When an existing site is lost from the network the impact felt is the loss of coverage that that site provided, however, it can also cause greater disruption to the wider network. This is because each site connects to another, that one to another and so on, so if one is decommissioned the impact can reach far further than the immediate consumers. In order to retain the existing coverage for both EE and Three users a replacement is required. The location of a replacement site is required to be as close to the existing site as possible in order to match as accurately as possible the foot print of the existing site. In this case, looking for an alternative site within the quarry has also been limited by where the quarry operations are expanding to. It is considered that the siting and design of the proposal is the optimum given the noted technical restraints and that any potential impact is outweighed by the public benefit of retaining existing coverage for both operators.

## Conclusion

In summary, the application is in respect of electronic communications apparatus necessary to retain and improve existing public infrastructure networks.

This statement has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in the NPPF and therefore warrants support. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact, being appropriately designed and located. It has been justified that the limited impact of this proposal is outweighed by the wider public benefit of replacing and enhancing network coverage to the local community.

In conclusion, the application merits support and there are no material considerations that indicate otherwise.

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