

Application to determine if prior approval is required for a proposed: Development by or on behalf of an electronic communications code operator for the purpose of the operator's Electronic Communications Network in, on, over or under land controlled by that operator or in accordance with the electronic communications code

The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 16, Class A

Publication of applications on planning authority websites

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

Site Location

Disclaimer: We can only make recommendations based on the answers given in the questions.

If you cannot provide a postcode, the description of site location must be completed. Please provide the most accurate site description you can, to help locate the site - for example "field to the North of the Post Office".

Number	<input type="text"/>
Suffix	<input type="text"/>
Property Name	<input type="text" value="Valley Gardens street works"/>
Address Line 1	<input type="text" value="Valley Gardens"/>
Address Line 2	<input type="text"/>
Address Line 3	<input type="text"/>
Town/city	<input type="text" value="Quedgeley"/>
Postcode	<input type="text" value="GL2 2DW"/>

Description of site location must be completed if postcode is not known:

Easting (x)

381681

Northing (y)

213637

Description

Proposed 5G telecoms installation: H3G 20m street pole and additional equipment cabinets.

Applicant Details

Name/Company

Title

First name

Surname

Gallivan

Company Name

CK Hutchison Networks (UK) Ltd

Address

Address line 1

450 Longwater Avenue

Address line 2

Address line 3

Town/City

Reading

County

Country

United Kingdom

Postcode

RG2 6GF

Are you an agent acting on behalf of the applicant?

Yes

No

Contact Details

Primary number

**** REDACTED ****

Secondary number

Fax number

Email address

**** REDACTED ****

Agent Details

Name/Company

Title

Mr

First name

Tom

Surname

Gallivan

Company Name

Dot Surveying Ltd

Address

Address line 1

14

Address line 2

Inverleith Place

Address line 3

Town/City

Edinburgh

Country

Postcode

EH3 5PZ

Contact Details

Contact Details

Primary number

**** REDACTED ****

Secondary number

Email address

**** REDACTED ****

Electronic communications apparatus

Please specify the type of apparatus to be installed or altered (e.g. call box, mast)

Proposed 5G telecoms installation: H3G 20m street pole and additional equipment cabinets.

Please provide further details of the apparatus (e.g. height, size, colour etc)

Proposed 5G telecoms installation: H3G 20m street pole and additional equipment cabinets.

Are you replacing an existing installation?

- Yes
 No

Additional information

Are you submitting a declaration confirming that the apparatus is in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP)? The emissions from all mobile phone network operators' equipment on the site must be taken into account when determining compliance.

- Yes
 No

Are you also providing a completed Supplementary Information Template (as set out in Appendix D of the [Code of Best Practice on Mobile Phone Network Development in England](#))?

- Yes
 No

Neighbour and Community Consultation

Have you consulted your neighbours or the local community about the proposal?

- Yes
 No

If Yes, please provide details

Gloucester City Council

Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

Yes

No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact?

The agent

The applicant

Other person

Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application?

Yes

No

If Yes, please complete the following information about the advice you were given (this will help the authority to deal with this application more efficiently):

Officer name:

Title

First Name

Surname

Reference

Date (must be pre-application submission)

Details of the pre-application advice received

Declaration

I / We hereby apply for Prior Approval: Development for electronic communications network as described in this form and accompanying plans/drawings and additional information. I / We confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine options of the persons giving them. I / We also accept that: Once submitted, this information will be transmitted to the Local Planning Authority and, once validated by them, be made available as part of a public register and on the authority's website; our system will automatically generate and send you emails in regard to the submission of this application.

I / We agree to the outlined declaration

Signed

Tom Gallivan

Date

04/11/2022

Mobile UK Briefing Note: 5G and Health

What is 5G?

5G is short for 'fifth-generation mobile networks.' It is a truly transformational technology that will provide the underlying wireless infrastructure to support a host of new applications such as connected cars, virtual and augmented reality and the foundations for emerging smart city and Internet of Things (IoT) technologies.

What are the features of 5G?

- **Faster download speeds:** 5G will provide much faster speeds than are achievable with today's 4G networks. 5G is expected to provide speeds between 1GBps and 10GBps. This would mean a full HD movie could be downloaded in 10 seconds as opposed to 10 minutes today.
- **Lower Latency:** 5G will also have significantly lower latency meaning very little lag (or buffering). This will enable applications that aren't possible today on mobile, such as multiplayer gaming, factory automation, and other tasks that demand quick responses.
- **Greater Capacity:** 5G will also have vastly greater capacity so that networks can better cope with not only the rapidly increasing data demands of customers today but the growth of high-demand applications being planned in the future.

Are 5G and mobile signals-safe?

Exposure guidelines govern mobile signals in the UK, and the consensus of reviews by independent public health authorities, including Public Health England, expert groups and the World Health Organization (WHO) is that these guidelines provide protection for all people (including children) against all established health hazards.

Exposure Limits and Guidelines

UK and international guidelines for exposure limits

The exposure guidelines in the UK have been developed by the International Commission on Non-Ionizing Radiation Protection (ICNIRP), following a comprehensive assessment of all the peer-reviewed scientific literature, including thermal and non-thermal effects. The guidelines are based on evaluations of biological effects that have been established to have health consequences. The WHO recommends that countries adopt the ICNIRP guidelines.

Do current guidelines cover 5G?

Yes, current UK and international guidelines cover all frequencies used for mobile telephony, including those allocated to 5G.

The ICNIRP exposure guidelines for frequencies up to 300 GHz, published in 1998, are being revised and replaced and are expected to be published this year. It remains the opinion of ICNIRP, and other bodies such as the WHO, that there is no convincing evidence of adverse health effects at exposure below the guideline levels.

Ofcom recently (February 2020) extended its programme measuring EMF emissions from equipment used to transmit mobile signals and other wireless services to cover the frequencies being used for 5G. It measured 16 5G sites in towns and cities across the UK, focusing on areas where mobile use is likely to be highest. At every site, emissions were a small fraction of the levels included in international guidelines, as set by ICNIRP. And the maximum measured at any site was 1.5% of those levels.

What kind of research exists on the possible health risks from exposure to 5G?

Information on new research and details of individual studies can be found in the EMF-Portal web database maintained by the RWTH Aachen University, Germany: <https://www.emf-portal.org/en>

The radio signal exposure characteristics of 5G are similar to those of existing mobile technologies. In particular, the new applications use similar transmitting powers and operate in similar frequency ranges. A European Commission expert committee concluded that current knowledge about how EMF interacts with the human body can be used to set exposure limits for the whole frequency range up to 300 GHz. Therefore, existing health risk assessments are valid independently of the wireless technology for the whole frequency range.

Are RF signals a possible human carcinogen, and what does that mean?

In May 2011 a working group of the International Agency for Research on Cancer (IARC) classified RF electromagnetic fields as possibly carcinogenic to humans (Group 2B). The WHO explains that this is a category used when a causal association is

considered credible, but when chance, bias or confounding cannot be ruled out with reasonable confidence.

It is important to note that following the classification, the WHO has not recommended any changes to the exposure limits applicable to wireless networks and devices.

What is the advice from Public Health England?

Public Health England's main advice, updated in May 2019, about radio waves from base stations is that:

*"The guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) should be adopted for limiting exposures. After reviewing the evidence, ICNIRP set guidelines to avoid excessive heating of the body and established the impact of exposure which can have detrimental effects. The ICNIRP guidelines apply to frequencies up to 300 GHz and cover exposures arising from new 5G base stations as well as from older technologies."*¹

What is the advice from the WHO on the mobile devices we use and health?

The position of the WHO regarding health effects from mobile phones is that:

"A large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have been established as being caused by mobile phone use."

Are children at greater risk?

There have been many independent scientific reviews, and these have consistently concluded that the international guidelines are protective of all persons, including children.

"Although a substantial amount of research has been conducted in this area, there is no convincing evidence that RF field exposure below guideline levels causes effects in adults or children." (United Kingdom Health Protection Agency (2012)).²

5G Networks

5G is broadcast at a higher frequency, so does that mean higher exposure?

No, higher frequency does not mean higher exposure. Higher frequencies generally mean shorter ranges, lower power and, due to the increase of the available bandwidth, provides for the possibility of higher data rates. Current and future deployment will use frequencies already covered by existing exposure standards.

Does higher data rates mean higher network exposure?

One of the goals of 5G deployments is to provide much higher data rates. This is needed to meet the high expectations and demands customers place on mobile communication applications and services both in their professional and private life. Based on the results from current 5G test networks, it is expected that the maximum exposure levels in areas around base stations will be similar to existing mobile services that use similar transmitter powers.

With the introduction of new technologies, there may be a small increase in the overall radio signal exposure level since new transmitters are active. Based on the transition from previous wireless technologies, we can expect that the overall exposure levels will remain relatively constant and well within the international exposure guidelines.

Will 5G replace earlier mobile network technologies?

Early 5G deployments will be in locations where it is needed to supplement the capacity of current networks. Further rollouts will occur as demand dictates. It is expected that 5G will work alongside other technologies, i.e. 2G, 3G and 4G, to provide a continuity of service for customers who can continue to use their devices on existing networks.

Does 5G mean an antenna on every street corner and inside all buildings?

Wherever possible, an operator will place these antennas at an existing site, potentially replacing one of the existing antennas on the site. Only where additional capacity and/or coverage is needed will additional sites be built.

Contact Details

For further information, please contact Mobile UK on info@mobileuk.org

¹ Public Health England, 2019

² Health Effects from Radiofrequency Electromagnetic Fields – RCE 20, Advisory Group on Non-ionising Radiation (AGNIR), Health Protection Agency, April 2012

Our Ref: GLO24830 - VALLEY GARDENS

Date: 3rd November 2022

F. A. O.

Quedgeley Urban Village Limited
135 Aztec West
Almondsbury
Bristol
BS32 4AW.

Dear Sir, Madam,

Subject: Proposed 5G Telecommunications Installation for CK Hutchison Networks (UK) Ltd

Town and Country Planning (General Permitted Development) (England) Order 2016

Proposed development at: VALLEY GARDENS, KINGSWAY, QUEDGELEY, GL2 2DW

National Grid Reference for this site E: 381681 N: 213637

I give notice that the agent on behalf CK Hutchison Networks (UK) Ltd will be applying to the relevant local planning authority as below under Part 16 Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2016 for its determination as to whether the prior approval of the authority will be required to the siting and appearance of:

Proposed telecommunications installation: Proposed monopole and additional ancillary equipment cabinets and associated ancillary works.

The application and accompanying plans shall be available for public inspection at the offices of the above authority, during usual office hours, at:

GLOUCESTER CITY COUNCIL, 92 WESTGATE STREET, GLOUCESTER, GL1 2PE

Proposed telecommunications installation: Proposed 20m high 'slim line' phase 9 monopole c/w wraparound cabinet at base, 3no. additional ancillary equipment cabinets and associated ancillary works.





Any individual and organisation wishing to make representations about the siting and appearance of the proposed development may do so in writing to the Local Planning Authority at the above address any representations must be received no later than; 14 days after the date below.

SIGNED: 

ON BEHALF OF: CK Hutchison Networks (UK) Ltd
Great Brighams Mead
Vastern Road
Reading
RG1 8DJ

DATED: 3rd November 2022



Our Ref: GLO24830 - VALLEY GARDENS

Date: 3rd November 2022

F. A. O.

Gloucester City Council and Gloucestershire County Council
Planning Services and Highways Department

By email [REDACTED] development.control@gloucester.gov.uk

Dear Sir, Madam,

Subject: Proposed 5G Telecommunications Installation for CK Hutchison Networks (UK) Ltd

Town and Country Planning (General Permitted Development) (England) Order 2016

Proposed development at: VALLEY GARDENS, KINGSWAY, QUEDGELEY, GL2 2DW

National Grid Reference for this site E: 381681 N: 213637

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SIGNED: 

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Great Brighams Mead
Vastern Road
Reading
RG1 8DJ

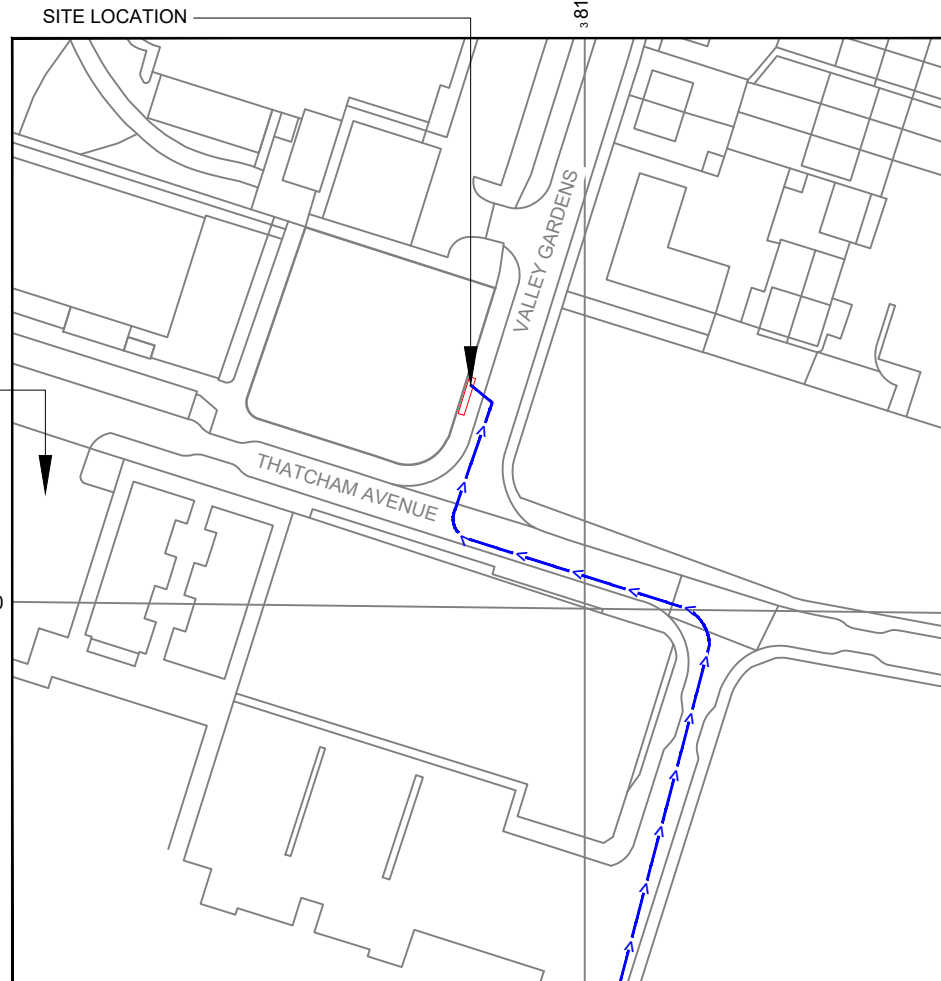
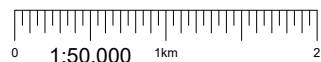
DATED: 3rd November 2022





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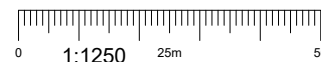
SITE AREA PLAN



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NGR E: 381681 N: 213637

SITE LOCATION PLAN



GOOGLE MAPS QR CODE

GOOGLE MAPS - <https://tinyurl.com/5ftrm3a8>

STREETVIEW - <https://tinyurl.com/sz5sbab5>



SITE PHOTOGRAPH

NOTES:

- ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

Access Route To Site:

Directions To Site: - Take M5 to A430. Take exit 12 from M5 2 min (1.6 mi). Head north-east on M5 1.3 mi. At junction 12, exit towards Gloucester/A38 0.3 mi. Keep left at the fork and merge onto A430 240 ft. Follow A430 to A38 in Hardwicke 48 s (0.4 mi). Merge onto A430 0.2 mi. Continue straight to stay on A430 0.2 mi. At the roundabout, take the 3rd exit onto A38 1 min (0.8 mi). Take Telford Way and Rudloe Dr to Valley Gardens Kingsway 3 min (1.0 mi). At the roundabout, take the 2nd exit onto Waterwells Dr 0.2 mi. At the roundabout, take the 1st exit onto Telford Way 0.2 mi. At the roundabout, take the 3rd exit onto Naas Ln 476 ft. Continue onto Rudloe Dr 0.5 mi. Turn left onto Thatcham Ave 148 ft. Turn right onto Valley Gardens Kingsway. Destination will be on the left 82 ft.

A	Issued for Planning	JWO	RWB	06.10.22
REV	MODIFICATION	BY	CH	DATE

CK Hutchison Networks (UK) Limited

Green Park,
450 Longwater Avenue,
Reading,
RG30 3UR

Design Consultant & Principal Contractor:



Great British Communications
Lapping House, Block 3 Forward Point,
Tan House Lane, Widnes, Cheshire, WAB 0SL

Site Name: **VALLEY GARDENS**

3UK Nominal ID: **GLO24830**

**VALLEY GARDENS,
KINGSWAY,
QUEDGELEY,
GL2 2DW**

Title: **002 SITE LOCATION PLAN**

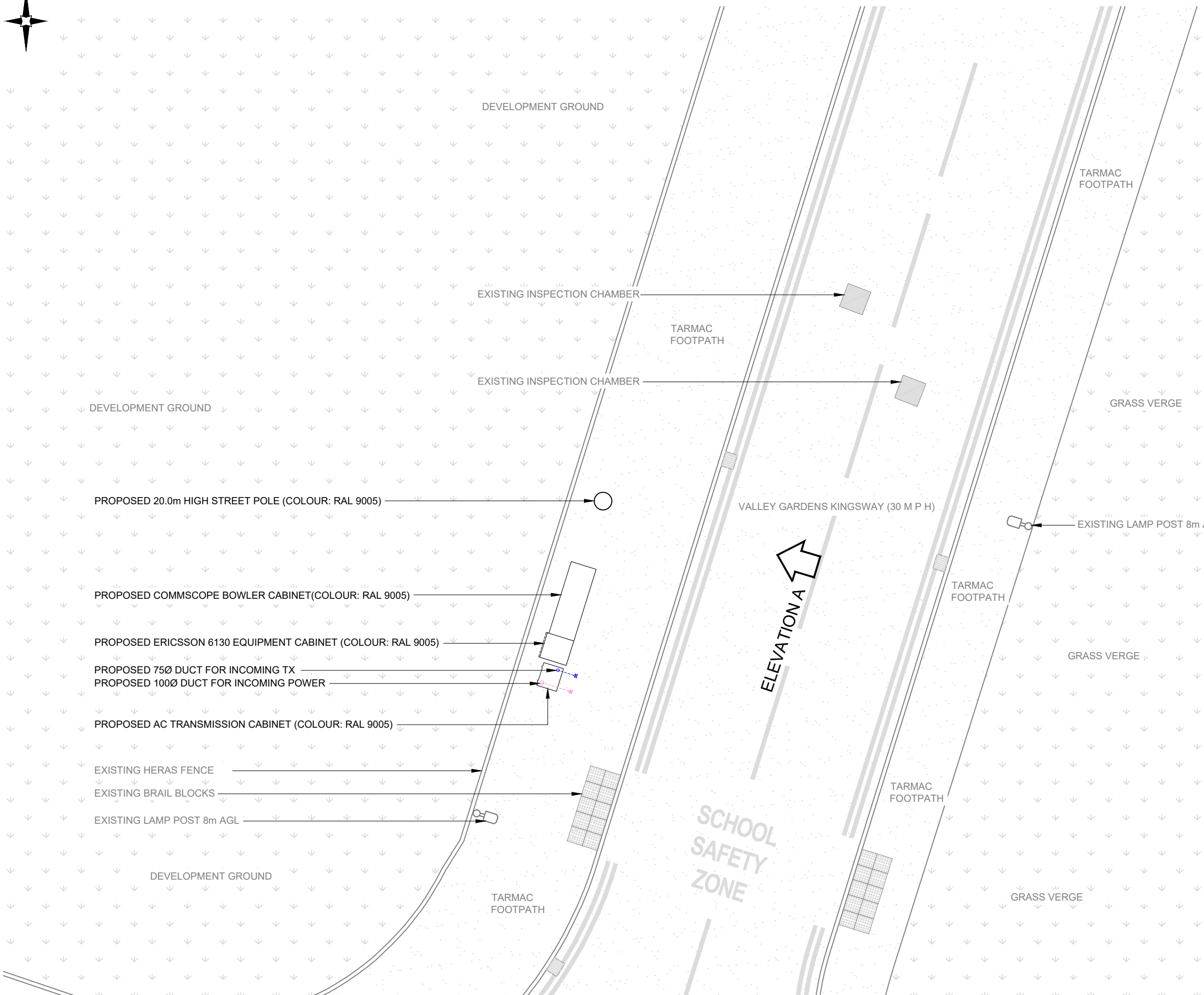
Project: **UNILATERAL SW**

Purpose of Issue: **PLANNING**

MBNL/TM/H3G Cell ID:
GLO064/88730/GL0615

Drawing No: **GLO24830_GLO064_88730_GL0615_GA_REV_A** Issue: **A**

100mm
50mm
10mm



PROPOSED SITE PLAN
 0 1:100 2m 4

NOTES:
 1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

A	Issued for Planning	JWO	RWB	06.10.22
REV	MODIFICATION	BY	CH	DATE

CK Hutchison Networks (UK) Limited
 Green Park,
 450 Longwater Avenue,
 Reading,
 RG30 3UR

Design Consultant & Principal Contractor:

Great British Communications
 Lapping House, Block 3 Forward Point,
 Ton House Lane, Widnes, Cheshire, WAB 0SL

Site Name: **VALLEY GARDENS**

3UK Nominal ID: **GLO24830**

VALLEY GARDENS, KINGSWAY, QUEDGELEY, GL2 2DW

Title: **215 PROPOSED SITE PLAN**

Project: **UNILATERAL SW**

Purpose of Issue: **PLANNING**

MBNL/TM/H3G Cell ID:
GLO064/88730/GL0615

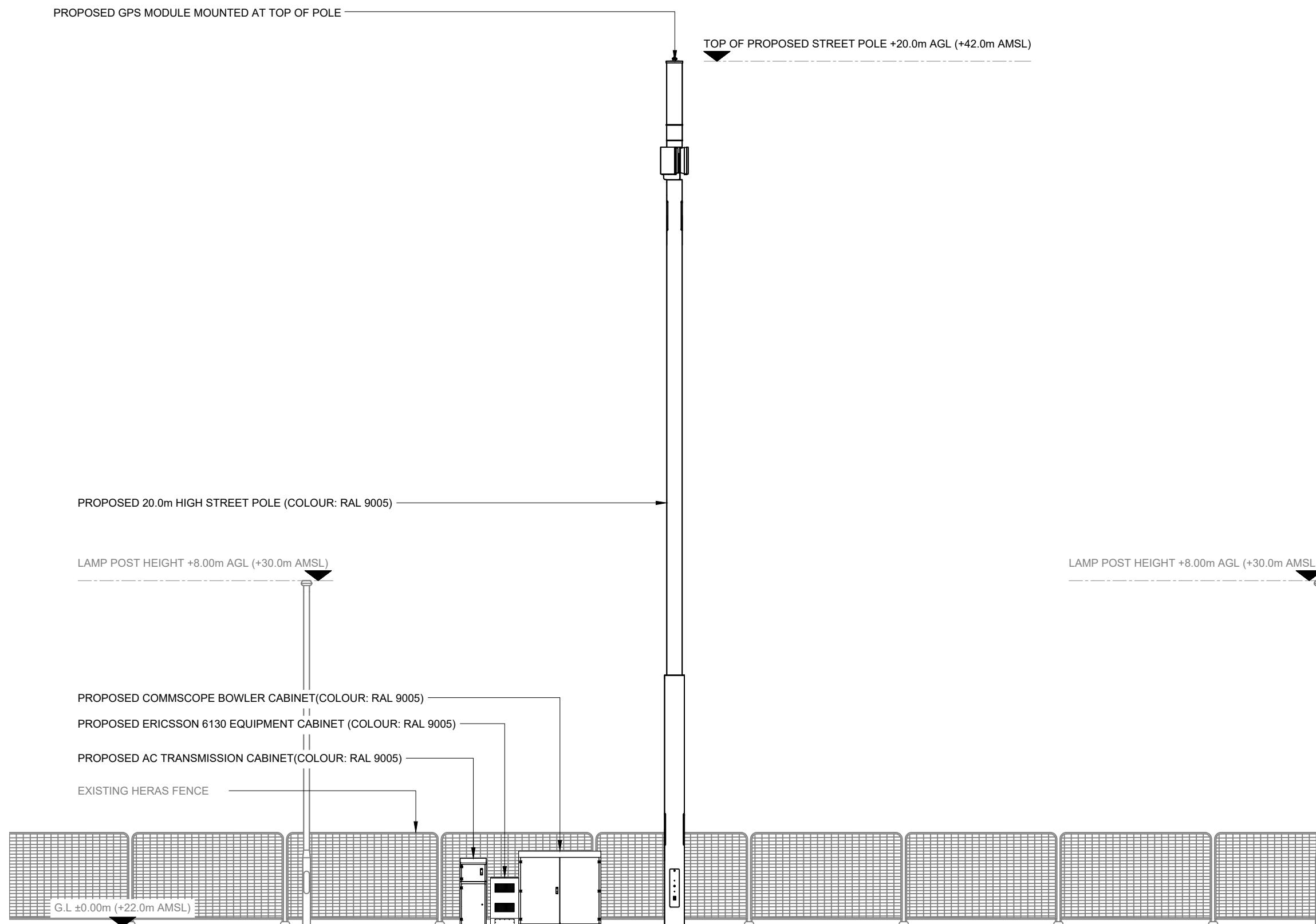
Drawing No: **GLO24830_GLO064_88730_GL0615_GA_REV_A** Issue: **A**

100mm
 50mm
 10mm

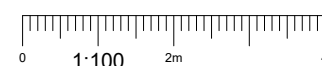
Antenna Aperture ID	Proposed 4G/5G Bearing
A1	0°
A2	0°
B1	120°
B2	120°
C1	240°
C2	240°

NOTES:

1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.



PROPOSED SITE ELEVATION A



REV	MODIFICATION	BY	CH	DATE
A	Issued for Planning	JWO	RWB	06.10.22

CK Hutchison Networks (UK) Limited

Green Park,
450 Longwater Avenue,
Reading,
RG30 3UR

Design Consultant & Principal Contractor:



Great British Communications
Lapping House, Block 3 Forward Point,
Ton House Lane, Widnes, Cheshire, WAB 0SL

Site Name:

VALLEY GARDENS

3UK Nominal ID:

GLO24830

VALLEY GARDENS,
KINGSWAY,
QUEDGELEY,
GL2 2DW

Title:

265 PROPOSED SITE ELEVATION

Project:

UNILATERAL SW

Purpose of Issue:

PLANNING

MBNL/TM/H3G Cell ID:

GLO064/88730/GL0615

Drawing No:

GLO24830_GLO064_88730_GL0615_GA_REV_A

Issue:

A



Department for
Digital, Culture,
Media & Sport



Ministry of Housing,
Communities &
Local Government

7th March 2019

Collaborating for digital connectivity

Government is committed to supporting investment in high-quality, reliable digital connectivity so that communities can benefit from faster economic growth and greater social inclusion. It is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. As outlined in the Future Telecoms Infrastructure Review, the Government would like to see nationwide full fibre coverage by 2033. We would also like the UK to be a world leader in 5G, with the majority of the population covered by a 5G signal by 2027. We are writing to ask for your help in supporting the investment necessary to achieve these objectives.

Recent years have seen substantial investment in mobile and fixed digital infrastructure across the UK. In 2016 the Gross Value Added from the digital sector was £116.5 billion, which equates to 6.7% of the UK economy, so the benefits for individuals and the UK as a whole are substantial. While mobile coverage across the UK has been significantly improving, there are still too many areas where coverage is poor. The UK has now achieved 95% superfast broadband coverage but still only 6% full fibre coverage.

We need to create the market and policy conditions necessary to support the large-scale commercial investment required to extend and future-proof digital connectivity. A key part of this is making it easier for operators to deploy infrastructure. To help to achieve this, the Government recently reformed the Electronic Communications Code - the statutory framework which underpins agreements between communications network providers and those in both the private and public sector who can provide sites for the installation of network equipment. The purpose of the reforms was to make it easier and more cost effective for communications network providers to deploy and maintain digital infrastructure.

Local authorities have an essential role to play as site providers. As Chief Executives, you can support investment in digital communications infrastructure by ensuring your organisations have policies and procedures in place that promote effective engagement with the digital communications industry and minimise barriers to deployment.

We have published [guidance for local authorities and network operators](#) on areas such as digital leadership, considerations for the local planning authority, streetworks, and on making local authority assets available to network operators for the installation of networks. This advice follows on from the [Digital Infrastructure Toolkit](#), which was published in 2018 and provides advice for central government and network providers regarding access to government sites.

We welcome the efforts that some local authorities have already made to enable network deployment. In future, the Government intends to publish information on how effectively local authorities are engaging with industry and adopting the principles outlined in this guidance. We would, therefore, ask you:

1. To ensure your teams are aware of, and using, the guidance the Government has provided to improve broadband and mobile connectivity in their areas.
2. If you have not already, identify a Digital Infrastructure Champion within your organisation and share these contact details with local.connectivity@culture.gov.uk, and
3. In particular, to ensure your teams are granting access to your assets and infrastructure effectively to support the rollout of full fibre and mobile networks.

I hope you agree that we should work hand in hand to support the significant new investment in digital infrastructure that can benefit our communities. With this in mind, Government will give significant weight to the extent to which local authorities have adopted the principles contained in our guidance when allocating funding for future DCMS projects aimed at boosting investment in fibre or mobile networks.

If you or any of your colleagues have any questions, please contact DCMS at

████████████████████

Thank you in advance for your cooperation.

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

1. Site Details

Site Name:	Valley Gardens street works	Site Address:	Valley Gardens Quedgeley Gloucester GL2 2DW
NGR:	E:381681 N:213637		
Site Ref Number:	GLO24830	Site Type:	Proposed 5G telecoms installation: H3G 20m street pole and 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:	21/10/2022	
Name of contact:	Email issue to the Local Planning Department.	

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.

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 the 27th August 2020.

School/College

Location of site in relation to school/college:

Kingsway Primary School- 30m from proposed location

Outline of consultation carried out with school/college:

Prior consultation carried out
Summary of outcome/Main issues raised:
N/A

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

Will the structure be within 3km of an aerodrome or airfield?		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:	04/11/22	

3. Proposed Development

<p>The proposed site:</p> <p>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.</p> <p>The technical details of this proposal are illustrated within application design drawings as attached.</p> <p>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.</p> <p>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.</p> <p>Figure 1 - Site Photograph's</p>
--



Proposed location of a new mast shown above 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 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 Local Plan against which the application will be determined, is

Extracts have been taken from the Gloucester City Council
Highlighting the importance of up-to-date telecommunications/Connectivity.

Local Policy

- 3.9 The development plan currently used by the City Council for Development Control purposes is the Second Deposit Draft Local Plan (2002). Policy FRP.16 of the plan provides a criteria-based policy for the consideration of telecommunications development.
- 3.10 This criteria based approach is carried forward into the emerging policy of the Local Development Framework Development Control Policies DPD. Draft Policy D7- Telecommunications Development states that, planning permission will be granted for telecommunications development subject to the satisfaction of a range of criteria. The policy is set out below.

Policy D7 – Telecommunications Development

Prior approval or planning permission will be granted for the installation of apparatus necessary for the transmission or receipt of telecommunications provided that all the following criteria are met:

1. The siting and design of the proposal has minimal impact on the residential amenity and appearance of the wider urban and rural environment
2. The siting of the proposal minimises the effect of the installation on the appearance of any building on which it is located
3. Applicants have fully explored the possibility of mast sharing or locating on other tall buildings with the vicinity; and
4. The need for future structural capacity has been taken into account.

- 3.11 This SPD expands on the reasoning behind the criteria and provides further guidance to operators on the information that will be required to be submitted with a prior approval or planning application.

Sustainable Community Strategy

- 3.12 It is considered that in broad terms, telecommunications development contributes towards the aims of the existing Community Strategy for Gloucester namely in creating a strong, vibrant and sustainable city, an inclusive city and in enhancing education.

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.”

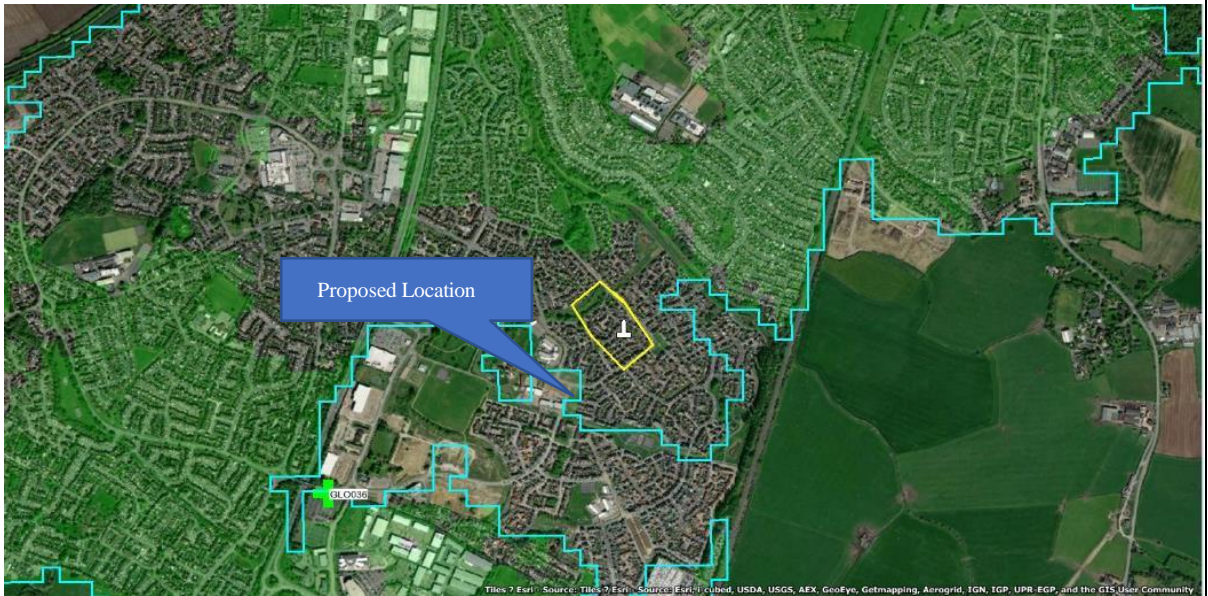
In keeping with the National Planning Policy Framework (NPPF) guidelines of using: “high quality communications” (Section 10), the proposed design has been selected to minimise visual impact upon the streetscape by integrating with the existing built environment.

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 H3G (Three) UK sites are illustrated within Figure 4 below:

Figure 4 - Coverage Map: Proposed installation must be located close to the area shown below.



Type of Structure

Description:	
Proposed 5G telecoms installation: H3G street pole and additional equipment cabinets.	
Overall Height:	See drawings
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:	See drawings
Equipment housing - type of material and external colour:	See drawings

Reasons for choice of design:
<p>The proposed installation supports 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.</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

<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

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 this area subject to this application. 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:

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

- a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and
 - b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.
- ”

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:

Site	NGR	Discounted Reason
D1 – <u>Wittering Way</u>	381886, 213794	This option has been discounted due to the unsuitable pavements and proximity to residential housing
D2 – Kingsway	381233, 213801	This option has been discounted due to the distance from the nominal
D3 – Valley Gardens	381527, 213987	This option has been discounted due to the unsuitable pavements
D4 – <u>Thatcham Avenue</u>	381897, 213843	This option has been discounted due to the unsuitable pavements and proximity to residential housing
D5- <u>Thatcham Avenue</u>	381753, 213592	This option has been discounted due to the unsuitable pavements



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 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 2021) 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 114 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 115

“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

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

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

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. 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 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

Name: (Agent)	██████████	Telephone:	██████████
Operator:	H3G	Fax no:	N/A
Address:	Dot Surveying, The Bonds (Suite 31), 2 Anderson Place, Edinburgh EH6 5NP	Email Address:	████████████████████
Signed:	██████████	Date:	04/11/2022
Position:	Planner	Company:	Dot Surveying
		(On behalf of above operator)	

Declaration of Conformity with International Commission on Non-Ionizing Radiation Protection Public Exposure Guidelines

Three UK Limited
Green Park
450 Longwater Avenue
Reading
RG30 3UR

Declares that the proposed equipment and installation as detailed in the attached planning / General Permitted Development Order application at:

VALLEY GARDENS,
KINGSWAY,
QUEDGELEY,
GL2 2DW

is designed to be in full compliance with the requirements of the radio frequency public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection¹ as expressed in EU Council Recommendation 1999/519/EC of 12 July 1999 "on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz)".

Date: 06.10.22
Name: Lida Dezhampah
Position: Design

Great British Communications Ltd
Lapwing House
Block 3 Forward Point
Tan House Lane
Widnes
Cheshire
WA8 0SL

¹ The updated ICNIRP Guidelines published in March 2020 are covered by this declaration