

**STATEMENT IN SUPPORT
OF
APPLICATION FOR PLANNING PERMISSION**

**INCORPORATING PLANNING STATEMENT, HERITAGE STATEMENT AND THE
DESIGN AND ACCESS STATEMENT**

24 JULY 2015

**PROPOSED DEVELOPMENT AT BT TELEPHONE EXCHANGE, ST BEDES, EAST
BOLDON, NE36 0LF**

**ARQIVA
TRAFALGAR HOUSE
110 MANCHESTER ROAD
ALTRINCHAM
CHESHIRE
WA14 1NU**

REF:MW/003

EXECUTIVE SUMMARY

The Proposed Development

This application is for the installation of electronic communications apparatus that forms part of Arqiva's planned Smart Metering network.

Arqiva is a designated Electronic Communications Code Network Operator and has been appointed by the Department of Energy & Climate Change to develop the Smart Meter infrastructure network in the north of England and Scotland.

The Benefits of the Smart Metering Network

Smart metering is a Government programme to roll out, between 2014 and 2020, smart electricity and gas meters to homes and small businesses across Great Britain. The smart meter initiative is a key part of the Government's programme to cut greenhouse gas emissions, decarbonise the economy and support the creation of new green jobs and technologies.

Smart Meters are the next generation of gas and electricity meters. They will offer a range of intelligent functions and provide consumers with more accurate information, bringing an end to estimated billing. Consumers will have near-real time information on their energy consumption to help them control and manage their energy use, save money and reduce emissions.

By providing these benefits it's argued that the development assists in achieving the goals of sustainable development. This is in accordance with the statutory duty placed upon local planning authorities and accentuated by the presumption in favour of sustainable development within the National Planning Policy Framework (NPPF).

Technical and Operational Constraints

The Smart Meter programme, like all electronic communications networks, will need to be supported by an infrastructure of operational sites with the required antennas and other apparatus needed to provide radio coverage to the local area.

As the Smart Meter network must be able to communicate with meters that are typically found in the heart of a property, for example, in an under stairs cupboard, then the sites must be developed in locations that can provide the required level of coverage.

Site Selection

In accordance with best practice site sharing, utilisation of existing buildings and structures has been explored in a sequential approach to best meet the operational need whilst minimising environmental impact. In this case, it is possible to utilize an existing building that is in communications use.

Pre-Application Consultation

Information on Arqiva's planned Smart Meter network was provided to the Council on 18 December 2013. Further pre-application consultation in relation to the application site was undertaken with your Authority in a letter dated 9 July 2015. No response was received from your Authority. A community consultation exercise was also undertaken with the North East office of Historic England, the local ward councillors for Cleadon and East Boldon Ward and 35 residential properties. A response was received from a local resident requesting additional information on the proposal.

Compliance with Planning Policy and other Material Planning Considerations

Policy at national level is set out in the NPPF. The NPPF views high quality communications infrastructure and systems, such as the coverage provided by the Smart Meter network, as essential for achieving sustainable development objectives.

The local development plan is the adopted Local Development Framework comprising the Core Strategy (June 2007) and the Development Management Policies Document (December 2011) and the emerging Local Plan Development Plan Document which is at the early stages of preparation. In review of the policies within these documents, the application demonstrates that the proposal is in accordance with the Development Plan and in particular policies relating to conservation, telecommunications, supporting economic development, and maintaining the environment. In addition, consideration has given to the need for the development being in the wider public interest and an

appropriate balance has been struck between the objectives of developing new high quality communications infrastructure and environmental considerations. It is considered that on balance the proposal offers greater benefit than harm and therefore should be acceptable in principle.

All reasonable steps have been taken to minimise any perceived visual and environmental impact whilst having regard to the need to provide the required level of radio coverage for the network.

With regards to design, layout and scale, this has been guided by the special technical and operational requirements that are associated with electronic communications development. Good practice guidance requires careful consideration of the siting and design to minimise appearance and to ameliorate potential visual impact.

ICNIRP Compliance

The proposed antennas comply with all relevant health and safety requirements, in accordance with ICNIRP guidelines. A certificate of compliance will be forwarded to your authority in the near future.

Servicing and Maintenance

The site will require periodic access for maintenance and servicing visits. This will be restricted to authorised personnel only, and therefore the proposal does not give rise to any issues associated with public access.

In conclusion, the proposed development has been sited and designed in order to locate the development as sensitively as practicable. Specific consideration has been given to technical requirements and national and local planning policy. The proposal is supported by both local and national planning policy, and as such it is considered that the application should be looked upon favourably.

1. INTRODUCTION

- 1.1 This statement is submitted in support of an application for planning permission at the BT Telephone Exchange, St bedes, East Boldon, NE36 0LF as part of Arqiva's planned Smart Metering communications network. Arqiva is a designated Electronic Communications Code Network Operator and has been appointed by the Department of Energy & Climate Change to develop the Smart Meter infrastructure network in the north of England and Scotland.
- 1.2 The development proposed is shown in detail in the drawings submitted. In summary, it involves
- Provision of 1 no.pole mounted omni antenna located on minor support appartus on the rooftop of the building
 - Provision of 1 no. small scale equipment cabinet at ground level to the rear of the telephone exchange building.
 - Minor ancillary works.
- 1.3 In this statement, which incorporates the heritage statement and design and access statement, we go on to highlight the purposes and benefits of the development proposed, to explain the particular need in this case and to demonstrate compliance with planning policy. We also provide information on health and safety and related issues by way of further reassurance.
- 1.4 Information on Arqiva's planned Smart Meter network was provided to the Council on 18 December 2013. Further pre-application consultation in relation to the application site was undertaken with your Authority in a letter dated 9 July 2015. No response was received from your Authority. A community consultation exercise was also undertaken with the North East office of Historic England, the

local ward councillors for Cleadon and East Boldon Ward and 35 residential properties. A response was received from a local resident requesting additional information on the proposal.

2. THE PURPOSE AND BENEFITS OF THE SMART METER NETWORK

- 2.1 Smart Metering is a Government programme to roll out, between 2014 and 2020, smart electricity and gas meters to homes and small businesses across Great Britain. The smart meter initiative is a key part of the Government's programme to cut greenhouse gas emissions, decarbonise the economy and support the creation of new green jobs and technologies.
- 2.2 The Department of Energy & Climate Change has awarded the contract to deliver the radio communications network for Smart Metering to Arqiva and Telefonica. Arqiva will deploy and manage the radio communications network in Scotland and northern England whilst Telefónica will provide the network to the remainder of Great Britain.
- 2.3 This new national smart metering 'Wide Area Network' is a key project in the UK's National Infrastructure Plan and will form part of the UK's Critical National Infrastructure. Its deployment and timely delivery is particularly important to achieving a sustainable economy and meeting key Government priorities enshrined in the Climate Change Act 2008, and thereby support the transformation to a low carbon economy.
- 2.4 In due course, the network will also be available to water utilities and in similar fashion, consumers will be better able to understand and make informed choices about their use of this natural resource.

2.5 The proposed development and the wider Smart Metering network will, therefore, make a significant contribution towards sustainable development objectives which will help the UK Government to meet its target of reducing emissions by at least 80% on 1990 levels by 2050 and now set down within the UK Carbon Plan. This is relevant to the statutory duty already placed upon local planning authorities under Section 39 of the Planning and Compulsory Purchase Act 2004 and now accentuated by the presumption in favour of sustainable development within the National Planning Policy Framework (NPPF). More specifically, it will help to deliver the aspirations set out in Sections 5 and 10 of the NPPF.

2.6 Having regard to the Government's three key dimensions for sustainable development within the NPPF, smart metering will in particular assist in the following ways:

- **An economic role** – smart metering communications will help businesses to be energy conscious, smarter and invest in more energy efficient infrastructure to reduce longer term running costs. Consequential spin offs will, among many, be the creation of new green jobs and technologies, modern and cleaner industries and help stimulate retail sales in more efficient appliances.
- **A social role** - modern smart metering communications will allow consumers to benefit from real time information on their energy consumption, to help them control energy use, save money and reduce emissions. With greater visibility and understanding of their energy consumption, consumers will be able to make more informed choices about which appliances to use and when. For example, a consumer seeing the power consumption of a tumble dryer might be encouraged to use a washing line instead or perhaps to avoid operating it during peak periods of demand when pricing is higher.
- **An environmental role** – smart metering communications will help to reduce energy consumption at homes and premises and allow smarter

working practices such as better energy management within larger businesses and incorporation of new efficient infrastructure into new developments. In this way modern smart metering communications will help ensure the prudent use of natural resources, alleviate energy waste, reduce carbon footprints and help the UK Government meet its energy emissions set within the UK Carbon Plan.

- 2.7 However, in order to make this important contribution to sustainable development objectives, the network has to be developed first and like all electronic communications networks, will need to be supported by an infrastructure of operational sites. This is no different than railway services, for example, being reliant on the associated infrastructure of lines and stations. In the next section, the particular network requirement from which this application stems is explained.

3. THE REQUIREMENT

- 3.1 Arqiva owns and operates the terrestrial radio and television broadcast networks. The company owns most of the tower portfolio originally developed by T-Mobile (now part of Everything Everywhere) and have rights and manage other masts, towers and rooftops, developed or otherwise suitable for use for electronic communications. In total, Arqiva has access to over 16,000 sites around the UK, which is considerably in excess of the numbers available to any other electronic communications operator in the UK. Arqiva is also licensed to use the 412-414MHz spectrum that will be used as part of the Smart Meter network.
- 3.2 Basing the Smart Metering network on this portfolio of existing sites will be a critical element in minimising the potential visual impact associated with the deployment of a new network. This is obviously consistent with longstanding statutory and government policy requirements to use existing sites or other high structures so as to minimise visual impact.
- 3.3 As the network must be able to communicate with meters that are typically found within the heart of a property, for example, in an under stairs cupboard, then the sites must be located so that they can provide an acceptable level of coverage to the properties that they serve.
- 3.4 The proposal comprises the utilisation of an existing building which is in communications use. The site search process has considered sites both within and outside of the East Boldon Conservation Area. Adopting a sequential approach to site selection, any existing telecommunications installations in the area were initially considered. A search of the Sitefinder database, maintained by Ofcom, and the most comprehensive of all databases of electronic communications sites, has identified that the proposal site is the most suitable location. The following existing telecommunications installations were considered and discounted:

Industrial Estate off Cleadon Lane, East Boldon

A 30m multi user lattice mast is situated at this location outside of the conservation area. The sharing of this mast was considered and discounted at an early stage due to operational and technical reasons. The mast is located on the northern boundary of East Boldon and too close to the adjacent site in the smart metering network at Cleadon. Effective coverage would therefore not be provided from this location. In addition, the existing mast is at capacity and would require significant modification to accommodate the smart metering equipment.

- 3.5 There are no other existing telecommunications sites with East Boldon. A search was also carried out to establish whether any other high buildings (other than the telephone exchange building) or structures might be used. The vast majority of the existing non-residential buildings (both inside and outside of the designated area) have a pitched roof design which is not conducive to the siting of telecommunications apparatus. Buildings at the industrial estate off Cleadon Road were discounted for the same technical and operational reasons already cited in relation to the existing mast at this location.
- 3.6 The possibility of siting a free-standing street works telecommunications mast to the rear of the highway within the settlement (either within or outside of the designated area) was discounted on technical and planning grounds given that a structure of significant height would be required to meet the coverage requirements and such a structure would be visually prominent in the locality and represent an inferior solution in planning terms to the use of the telephone exchange building.
- 3.7 Our conclusion is that the siting of the antenna on the rooftop of an existing building strikes the best balance between environmental and operational considerations, including the key requirement for the development to be close to the properties it is intended to serve. This is the reason for the application before you.

- 3.8 This proposed installation has to fit in with the overall plan for the network based around the wider Smart Metering network. To help illustrate the context of this application, a coverage plot is submitted. This estimate tends to exaggerate true levels of coverage on the ground, because the modelling only takes into broad account general topography and manmade features. However, it is a useful tool for explaining how the new installation will fit into the network in the wider area.
- 3.9 The coverage plot shows the area of coverage in red that the installation will provide (NE38_1). The adjacent site in the Smart Metering network (at Cleadon) is also shown. The proposal will also provide capacity to the network in what is a densely populated area.

4. COMPLIANCE WITH PLANNING POLICY

4.1 The relevant planning policy framework that has been taken into account and in part already alluded to is found principally within:

- The Development Plan
- National Planning Policy Framework (NPPF)
- The Code of Best Practice on Mobile Network Development in England

4.2 These documents provide the overall policy background for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development.

The National Planning Policy Context

4.3 The general policy context can be summarised as follows:

- Government policy within the NPPF is to support high quality communications infrastructure and systems – this is especially relevant to smart metering, which is a Government initiative
- Government policy is to keep the inevitable environmental impact associated with electronic communications development to the minimum
- The best way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites
- The starting point for planning new networks or the expansion of existing networks is therefore to use existing electronic communications sites
- Where new installations are required, as in this case, operators should look to develop innovatively designed structures, such as those designed to blend in with the street scene

- 4.4 The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. The NPPF recognises that this is especially relevant where a development might have other significantly important benefits such as being essential to meet, for example, new nationally important infrastructure such as the Smart Meter communications network.
- 4.5 The importance of the proposed development as part of the Smart Meter network is clearly an important material planning consideration as it is precisely the type of new digital infrastructure that the NPPF is seeking to support. Hence, it is important to reflect on some key points within the NPPF which are relevant to the very important development at this site and the general planning principles that should apply when determining the merits of the application:
- a. Paragraph 14 advises that authorities should:
 - positively seek opportunities to meet the development needs of their area [as part of plan making];
 - meet objectively assessed needs unless the adverse effects would *“significantly and demonstrably outweigh the benefits”* ;
 - b. Paragraph 17 advises that planning should *“proactively drive and support sustainable development to deliver the homes, businesses and industrial units, **infrastructure** and thriving local places that the country needs”* [my emphasis];
 - c. Paragraph 187, on “decision-taking” states that authorities should *“look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible”*.

- 4.6 Paragraph 14 of the NPPF further states that the presumption in favour of sustainable development lies at the heart of the planning system and, in respect of decision-taking, this means that – development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully with all relevant Development Plan and NPPF policies and, therefore, permission should be granted for the development.

Section 5 - Supporting Advanced Communications Infrastructure of the NPPF

- 4.7 The proposal is supported by, and accords with, the guidance in Section 5 of the NPPF, which provides further guidance on the Government's objective of providing high quality communications networks in England.
- 4.8 The NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this has to include an understanding of the associated special problems and technical needs of developing communications networks such as the Smart Meter network.

Section 7 – Requiring Good Design of the NPPF

- 4.9 Government places great importance on the design of the built environment and paragraph 56 of the NPPF states that this is an integral objective of achieving sustainable development. The careful approach taken to the design and siting of the proposed development complies fully with this general policy objective.
- 4.10 More specifically, the proposal is supported by the guidance in paragraph 65 of the NPPF, which states that:

'Local Planning Authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).'

- 4.11 In respect of this guidance, all reasonable steps have been taken through careful siting and design to minimise the visual impact of the development, so far as the technical and operation constraints allow. The proposal is an acceptable design solution that will not have any impact on a designation heritage asset.

Site Specific Policies

- 4.12 The site is located within the East Boldon Conservation Area. Consideration of heritage assets in undertaken at Section 5 below.
- 4.13 The proposal complies with relevant policies of the South Tyneside Local Development Framework. Specifically Policy EA1 – Local Character and Distinctiveness of the Core Strategy (June 2007) and Policy DM1 – Management of Development of the Development Management Policies Document (December 2011). We note that your Local Plan is at the early stages of preparation.
- 4.14 The proposal will facilitate the utilization of an existing building and through sensitive siting of the pole mounted omni antenna (taking account of technical matters), the overall impact on the locality is minimized.
- 4.15 It is also material that the proposal, and its role within the nationally important Smart Metering network, will support the Council's aspirations to tackle climate change as set out in your Local Development Framework.

4.16 In summary, the sensitive way the development proposed has been brought forward accords with best practice and forms part of a national important infrastructure project to provide smart metering services to the local area. It accords with the key policy objectives at national level, which are reflected in the relevant policies at local level. The development proposed is therefore acceptable in principle and also accords with the more detailed guidance expressed in local policy.

5. HERITAGE ASSESSMENT

- 5.1 Conservation areas are designated to protect their special architectural and historic interest from adverse development and encourage wherever possible their enhancement. Designation introduces a general control over demolition and provides the basis for policies designed to preserve and enhance all the aspects of character or appearance that define an area's special interest.
- 5.2 When an area is designated a conservation area the council has a duty to give special regard to the desirability of preserving or enhancing the character or appearance of the area" in the consideration of development proposals.
- 5.3 The East Boldon Conservation Area represents the identified heritage asset. The NPPF and local policy reflects the statutory duty placed on a local planning authority to preserve or enhance the overall character and appearance of a conservation area when assessing development proposals.
- 5.4 All reasonable steps have been taken to minimise the visual impact of the development on the immediate and wider locality, having regard to the operational and technical factors affecting its role within the Smart Meter network. A single ultra slimline pole and antenna are proposed rather than three bulkier sector antennas that could have been utilised. Furthermore, there are no better sites within or outside of the conservation area that can be used in this case. As the visual impact of the development is acceptable and there is no better available alternatives, the proposal meets the requirement to preserve the

overall character and appearance of the conservation area, entirely in accordance with section 12 'Conserving and enhancing the historic environment' of the NPPF and the objectives of development plan policy E6.

- 5.5 Even if a counter position is adopted and some limited harm to the overall character and appearance of the conservation area is perceived, then the guidance at paragraph 134 of the NPPF applies. This advises that the less than substantial harm caused should be weighed against the public benefits of the proposal, in this case the sustainable development benefits of the Smart Metering network, and the absence of any available alternative to the application site. Paragraph 138 of the Framework further advises that not all elements of a conservation area will necessarily apply to its significance.
- 5.6 To conclude the proposed siting and design of the installation has been selected so as to minimise visual impact and impact on the character and appearance of the designated area.
- 5.7 Overall and taking account of the technical requirements of the smart metering project it is considered that the proposal preserves the character and appearance of the Conservation Area. The proposal fully accords with local planning policy within your Local Development Framework and also national policy within the NPPF.

6. DESIGN AND ACCESS STATEMENT

- 6.1 The development proposed essentially involves engineering operations and so is arguably exempt from the requirement to provide a design and access statement under Article 8 (1) (b) of The Town and Country Planning (Development Management Procedure) (England) Order 2010. However, to assist your determination this section provides a description of the process adopted in the design of the proposals and explains the access considerations. The significant

contribution such development makes towards sustainable development objectives has already been outlined earlier.

Physical Context

5.2 The application site comprises the rooftop of the telephone exchange building on St Bedes in East Boldon. The proposal will be sited in this context taking account of technical constraints.

Amount, Design, Layout and Scale of the Development

5.3 The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide an acceptable level of coverage to the local area, having regard to the need to minimise visual impact, which have been explained in the previous sections of this statement. For example, the numbers of antennas and their size is the minimum amount of development required to provide the required level of coverage for the Smart Meter network. Indeed, a single antenna is proposed. The proposed siting of the equipment also takes account of technical and other considerations, including the following:

- The antenna has to be installed at specific locations and heights to meet the coverage requirements
- The antenna has to be installed to ensure compliance with ICNIRP guidelines. These guidelines provide protection to the general public and for occupational purposes. For rooftop installations, the antennas either have to be located along the building edge to ensure no one can walk in front of them or have a clearance of about 2.5 metres from the roof to the antenna base (as in the current case).
- All apparatus has to be maintainable in accordance with general health and safety requirements including the CDM regulations.
- All apparatus has to be installed in a structurally feasible manner.

- All apparatus has to be clear of existing features on the roof such as access points, air conditioning units, roof lights, or other electronic communications apparatus.
 - All apparatus has to be installed in accordance with the requirements of the building occupier.
- 5.4 The number of antennas, the extent of support structures and the number of radio equipment cabinets and their size has been limited to what is required to meet current and foreseeable network requirements. In this instance the coverage can be provided by a single “whip-like” omni antenna mounted on a slimline pole on minor support apparatus. The associated small scale equipment cabinet is to be located a ground level to the rear of the telephone exchange building. The equipment will be located so as to minimize visual impact whilst taking account of technical considerations.

Access Considerations

- 5.5 Access to the site will be provided through the existing access to the telephone exchange building.
- 5.6 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.
- 5.7 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Landscaping

- 5.8 The proposal relates to the installation of electronic communications apparatus on the roof of a building. A scheme of landscaping is, therefore, considered unnecessary in this case.

Appearance

- 5.9 The sensitive approach to siting and design should minimise the appearance of the development proposed. Insofar as the antennas and other apparatus may be visible they should look straight forward in appearance and reflect their function. To that extent they should in time become accepted features of the local environment as with other forms of communications networks and essential public utility infrastructure.

6. ICNIRP COMPLIANCE

- 6.1 A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure is included with this submission. Accordingly, as explained within the NPPF, it is not necessary, to consider further the health aspects and concerns about them, which include the perception of risk.

7. SUMMARY AND CONCLUSIONS

- 7.1 The proposed development forms part of Arqiva's planned Smart Meter network, which is being created as part of the government's initiative to roll out smart electricity and gas meters to homes and small businesses across Great Britain between 2014 and 2020. The network forms part of the UK's National Infrastructure Plan and the information provided by smart meters will help consumers to better manage and reduce energy use and potentially save money. Smart meters will play an important role in the government's policies to achieve a transition to a sustainable and low-carbon economy.
- 7.2 The application site was selected as it is an existing building in a location that will facilitate the required coverage to the settlement and which will allow the siting of the equipment in a visually acceptable manner.
- 7.3 The proposal will preserve the character and appearance of the conservation area in which the site is located. It is considered to strike the best balance between operational and environmental considerations that apply to its role within the Smart Meter network. The proposed siting and design has been chosen to minimise visual impact and should, therefore, be acceptable.
- 7.4 The proposed antenna will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore there is no need to consider health effects and related concerns such as the perception of risk further.
- 7.5 This statement has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in the NPPF. 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.
- 7.6 In conclusion, the application merits support and there are no material considerations that indicate otherwise.