

Michal Laskowski

From: Michal Laskowski
Sent: 11 September 2024 12:48
To: 'Planning (SMDC)'
Subject: RE: FAO: Ben Hurst, Prior notification LPA ref: DET/2024/0031 (Our ref: 20792921)

Dear Ben,

Following up on my previous email, I would like to ask if you have any comments or questions regarding this proposal.

Additionally, could you please provide the Council's view on the proposal?

Kind regards
Michal

From: Michal Laskowski
Sent: Thursday, August 22, 2024 4:29 PM
To: Planning (SMDC) <planning@Staffs Moorlands.gov.uk>
Subject: FAO: Ben Hurst, Prior notification LPA ref: DET/2024/0031 (Our ref: 20792921)

Dear Ben,

I am writing in relation to the above application to ask if you have any comments or questions about the proposed development, as well as to ask what your views on the proposal are. Additionally, I would like to address some of the objections that have been raised and note that there appears to be some support from residents as well.

Regarding the health concerns all applications are in full accordance with ICNIRP guidelines (an internationally and nationally government recognised organisation) and have an ICNIRP declaration submitted as part of the application. As stated, a declaration of ICNIRP compliance has been provided with the application documentation for this proposed radio base station and as such in line with code of practice and NPPF there is no requirement to consider health matters as part of this application.

Radio base stations and handsets use electromagnetic fields (EMFs) to transfer information and make communication possible with mobile phones and devices. EMFs are used for television and radio transmissions, by the police, fire and ambulance services, by taxi firms and public utilities. EMFs are also used for a wide range of personal and commercial equipment from electronic car keys, WiFi equipment and baby monitoring devices to shop security tag systems. They are also

produced by household electrical appliances like the fridges, vacuum cleaners or electric shavers. The UK Health Security Agency (UKHSA) have noted that “Exposure to radio waves is not new and health-related research has been conducted on this topic over several decades. In particular, a large amount of new scientific evidence has emerged since the year 2000 through dedicated national and international research programmes”. After a thorough review of the available scientific findings, the World Health Organisation reported: “To date, the only health effect from RF fields identified in scientific reviews has been related to an increase in body temperature ($> 1\text{ }^{\circ}\text{C}$) from exposure at very high field intensity found only in certain industrial facilities, such as RF heaters. The levels of RF exposure from base stations and wireless networks are so low that the temperature increases are insignificant and do not affect human health” World Health Organisation, Fact Sheet 304, Base stations and wireless technologies, 2006. In addition, the WHO notes that “Based on a recent in depth review of the scientific literature, the WHO concluded that current evidence does not confirm the existence of any health consequences from exposure to low level electromagnetic fields”. In 2020 the World Health Organisation published information on 5G commenting that: “Provided that the overall exposure remains below international guidelines, no consequences for public health are anticipated”.

Addressing the objections in relation to the proposed design, height and location of the radio base station. The operator has carefully considered the design of the new proposed column. The operator is proposing the most sensitive design currently available to provide the necessary coverage and capacity to the surrounding area. Due to all the technologies that will be available at this location, 2G, 4G and 5G, 6 antennas need to be installed at the top of the slim-line monopole. These are split into a dual stack formation where 3 antennas will be located at the top and the other 3 will be located underneath. The proposed height at 20m is essential in order to provide coverage to the target coverage area. 5G new radio technologies operate in higher frequency bands than older technologies. Since it operates at higher frequencies where attenuation of the radio signal is naturally higher and the effects of clutter are greater it will normally require a higher structure to achieve the same coverage footprint. To increase capacity and data speeds to the user, the antenna will normally need to be mounted higher than conventional antennae. These factors drive a requirement for an increase in antenna height in 5G. The operator proposed to site the radio base station in a such a way, so it isn't directly in front of residential frontages, minimising the visual impact on the area. The proposed design of the radio base station is one of the most sensitive designs available to the operator, designed to resemble other vertical elements of street furniture.

4G signals by their very nature (as they carry high rates) do not penetrate over long distances, (5G even less so), just a few hundred metres, depending on the topography of the land, building clutter and vegetation including trees in the area which can reduce their effectiveness. Therefore, 4G and 5G radio base stations need to be close to their customer demand. Because by their very nature radio base stations are low powered, they can only cover a limited geographical area. Therefore, base stations must be located where people want to use their phones – where they live, work and travel.

It is accepted that the height of the proposed installation is taller than other pieces of surrounding linear items of street furniture. Being taller than more traditional urban items of street furniture in itself is not a valid reason to conclude that it is not appropriate at a specific location. Indeed, Inspectors at appeal have noted that by their very nature to be effective masts are required to be taller than surrounding structures and that telecommunications masts are now common urban items of street furniture. Telecommunications apparatus by their very nature must be taller than surrounding built and natural form to ensure its efficient operation.

Addressing the objections regarding the impact on the property values. Homeowners sometimes feel that the value of their property may be reduced by a new telecommunications development, but there is no hard evidence to suggest that this is the case. Property valuation is a complex process, involving many elements and an individual's choice of property is a highly subjective matter. The town and country planning system must provide a balance between the interests of the wider public and any possible adverse effect on an individual. It is not the role of the planning system to protect on individual's interests above the rights and interests of another.

As part of Cornerstone's network improvement programme, Vodafone is in the process of progressing a number of suitable sites for radio base stations, which will provide improved 4G coverage and capacity, as well as new 5G service provision. This is in fully in line with the Government's aim to ensure that everyone is connected to the superhighway. As part of Vodafone's continued network improvement program, there is a specific requirement for a new installation at this location to provide improved 4G coverage, and new 5G coverage, ensuring that this area of Endon has access to the latest technologies.

3G (and eventually 2G) is being switched off by the operators in order to repurpose these radio frequencies for faster more energy-efficient 4G and 5G services. 3G is primarily used for mobile data services. It is being switched off first because it has already largely been superseded by 4G, hence the importance of providing the latest 4G and new 5G service provision in areas where there is no such coverage. 3G has already been switched off by Vodafone and EE in early 2024, and VMO2 (known as O2) is planning to do the same. Whilst no firm timescale have been announced as to when this will happen, it is expected to occur by 2025. As a result, it is imperative that the operator builds resilience into the network.

5G service provision is not just about coverage, it is about capacity through the many layers of technology the operator provides to their customers to deliver a better-quality experience, greater data speed upload and download, as opposed to waiting for a file to download or a map to get from A to B (on the network) due to congestion.

As it was demonstrated in section 5 of SSSI document, submitted with the application, there are no more suitable sites within the search area that are located within less sensitive locations than the current proposed site. It is noted that within one of the objections received by the Council, a resident suggested 2 alternative locations, first at layby towards Leek, which would be some 220m northeast from the nominal site, and the second one at land at water processing plant, which would be over 400m away from the nominal site. However, both of them are located too far away from the search area to be able to provide required levels of coverage, and therefore, they were discounted by the radio planner. The proposed site is located on the edge of the search area, as far away as practicable from residential properties and conservation area while still allowing the operator to provide the required coverage. Below is attached the search area (pink), along with all alternative sites that were discounted, as per SSSI document.



As radio base stations must provide coverage on the operator's network, their siting options are limited by technical constraints. Therefore, even if there are sites within the search area that could potentially have a smaller visual impact on public amenity, they might not be suitable from an operational perspective. This was recognised by the Inspector in a recent appeal (Ref: APP/C5690/W/23/3334595, please see the attached). In paragraph 13, the Inspector stated: "...Whilst there may be sites which are better sited in respect of character and appearance as well as amenity considerations, there is little point in assessing those sites if they do not meet operational requirements to support high quality communications...". This is such a case where, due to operational requirements, there are no more suitable alternatives.

Kind regards
Michal