

## County Durham & Darlington NHS Foundation Trust

Proposed resiting of telecommunications and associated apparatus on the southern section of the tower block at the Darlington Memorial Hospital, Hollyhurst Road, Darlington, County Durham, DL3 6HX for the County Durham and Darlington NHS Foundation Trust

Planning, Design & Access  
Statement

## Addendum

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## BASIS OF ADDENDUM SUBMISSION

1. This addendum to the originating planning, design and access statement submitted in support of a planning application (reference 09/00688/FUL) for the erection of telecommunications equipment at the Darlington Memorial Hospital (DMH) addresses a number of matters raised by the Local Planning Authority (LPA) during the tenure of the application, namely:
  - Protection of Public Health
  - Pre-Application Discussions
  - Overlooking
  - Visual form of Development & Location of Antenna
  - Radio and Television Interference
  - Noise from Equipment Housing

## PROTECTION OF PUBLIC HEALTH

2. National planning advice on telecommunications is set out within Planning Policy Guidance note (PPG) 8, which at paragraph 30 states with clarity that:

*It is the Governments firm view that the planning system is not the place for determining health safeguards*

3. The issue of the protection of public health within the PPG is clearly framed against the construction of mobile phone base stations and masts. It goes onto note that if such a proposal (i.e. mobile phone base station/mast) meets the ICNIRP guidelines it should not be necessary to go onto consider further the health aspects of the development and concerns about such matters.
4. In this instance, whilst the proposal does not involve the formation of a mobile phone base station/mast it does include the re-location of 2 small microwave dishes for the transmission of data. As a consequence a Declaration of Conformity with the ICNIRP Public Exposure Guidelines supported the application.
5. Having regard to the advice set out in PPG8 the matter of the protection of public health has been addressed in the appropriate manner.

## PRE-APPLICATION DISCUSSIONS

6. On the matter of pre-application discussions PPG 8 remarks at paragraph 11 that:

*Where a mast is to be installed on or near a school or college it is important that operators discuss the proposed development with the relevant body of the school or college concerned before submitting an application for planning permission or prior approval to the local planning authority.*

7. The guidance is clearly aimed at instances where either the base station/mast for a mobile phone operator is located at a school or within its grounds where the school body seeks additional revenue, or where such installations are located immediately adjacent to a school site. Critically, the PPG does not define what distance constitutes *near a school*.

8. Allowing for the fact that the proposal does not involve either the construction of a mobile phone base station or erection of a mast coupled to the distance of the antenna (including height) to the George Dent Nursery School on Elms Road no pre-application discussions was undertaken with the School. It is considered that the adoption of such an approach accords with the guidance set by Government within the PPG.

## OVERLOOKING

9. The proposed development incorporates the erection of an access ladder and guardrail to the upper and lower roofs for the purposes of routine maintenance on the south-eastern service room. There has been concern expressed by a local resident that such equipment will affect residential amenity via over looking by the use of the ladder and guardrail during the maintenance of the antenna.
10. This question was considered in respect of the rooftop plant room application, which included guardrails again for maintenance purposes together with a fire access. The Council in granting planning permission accepted that the view expressed by the Head of Planning Services that the use of such equipment:

*Would not be occupied by workers etc and therefore these areas would not be manned on a regular basis to create any overlooking problems*

11. It must be borne in mind that the hospital and the adjoining residential properties lie within an urban area when overlooking either directly or obliquely is part of the social and built fabric of such areas. In addition, the decision-makers should also be aware that the tower block, which is some 8 storeys in height, on the east and south elevations incorporate a number of wards where patients and visitors can look upon the immediate and wider residential areas.
12. For the above reasons, it is considered the view expressed by local residents that the proposed development will affect residential amenity by way of overlooking lacks any veracity.

## VISUAL FORM OF DEVELOPMENT & LOCATION OF ANTENNA

13. In view of the fact that the antenna (including the support structure), save for the 2 micro-wave dishes, do not exceed the point where installed of four metres in height and that the radio equipment does not constitute development, the only relevant matter is - whether the equipment has been located in such a way as to minimise its impact so far as practicable.
14. The communications equipment is currently housed on the existing plant room, which under the extant planning permission is to be doubled in height and to ensure that the hospital can function the antenna etc have to be relocated.
15. The equipment that is being re-located has been designed to ensure that satisfactory radio coverage is achieved there is an overarching need to provide omni-directional and line-of-sight coverage for the transfer of data from the microwave antenna. In order to achieve this the equipment must be located either very high on the building or in separate locations close to the edge of the roof.
16. Consideration was given at an early stage to the construction of a substantial lattice style tower mounted on the roof upon which to affix the equipment, however this was discounted on the basis that it would have been highly prominent and would not be acceptable in terms

- of its visual impact and structural matters associated with such a tall structure on an 8 storey building.
17. Additional consideration was given to mount the equipment on existing guardrails or the face of the building. Such an option was not practical due the method of construction of the walls and guardrails coupled to the fact that such a placement would not allow a safe method to undertake maintenance.
  18. In response to these constrains and the need to maintain the communications coverage on a permanent basis it is necessary to install the telecommunications equipment on the southern aspect of the tower block. The antenna and radio equipment is located to ensure that the line-of-sight for the microwave antenna is maintained to Scotch Corner and the radio poles are sited to allow maximum omni-directional communications. The height of the antenna and radio poles is dictated by the need to ensure clearance of the existing and finalised tower block plant room and the use of the service rooms mitigates the need for larger antenna and radio poles if it were possible to locate the telecommunications equipment on the roof of the tower block.
  19. It is considered for the reasons set out above and identified constraints that all reasonable steps have been taken to minimise the impact of the equipment upon the surrounding area so far a practicable, which is illustrated on the views of the existing telecommunications arrangement and proposed development form submitted with the application papers.
  20. In addition, it should be noted by the decision-makers that as a matter of good and responsible governance the applicant has reviewed the telecommunication requirements of the DMH that has resulted in a reduction of antenna and dishes from 10 to 5 items.

## RADIO AND TELEVISION INTERFERENCE

21. There is no evidence presented to indicate that the existing antenna interferes with television and radio reception. It is likely that any drop in quality of reception is not due to the equipment as the antenna operate on a different frequencies but may be attributable to the due mass and height of the tower block.

## NOISE FROM EQUIPMENT HOUSING

22. We can confirm that no fans or noise emitting equipment will be located on or near the relocated equipment and therefore attaching a condition requiring such details would not be in accordance with Government advice on planning conditions as set out in Circular 11 of 95 – The Use of Conditions in Planning Permissions.

## CONCLUDING COMMENTS

23. For the above reasons the applicant is of the view, which is supported by Eko Planning, that the concerns expressed by the Council does not warrant the application the being denied the benefit of planning permission that it clearly merits.