Design, Access and Supporting Statement in respect of GPDO Application On behalf of EE Ltd At Grassed verge Upper Shoreham Road West Sussex BN43 6BE



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Rev	Originator	Approved	Date
0	Name	Name	Day/Month/Year
1	Keith Hecken	William Osborne	30/11/2016

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Introduction

In September 2009 it was announced that France Telecom and Deutsche Telekom had agreed to merge T-Mobile UK and Orange UK into a 50:50 joint venture, to create the UK's leading mobile operator. Orange and T-Mobile will continue as the market-leading brands, providing their customers with the great service, innovation and value they always have done. However, behind the scenes, EE will oversee the growth of the two brands, seizing the opportunity to do things differently, and making a difference for its business, its employees, its customers - and the world around us.

This Planning Supporting Statement has been prepared by Harlequin Group on behalf of EE Limited. The statement has been prepared in support of the application to install a 17.5metre high street works tower installation and associated equipment to be located on publicly maintained land off Upper Shoreham Road, Shoreham-by-Sea, West Sussex BN43 6BE.

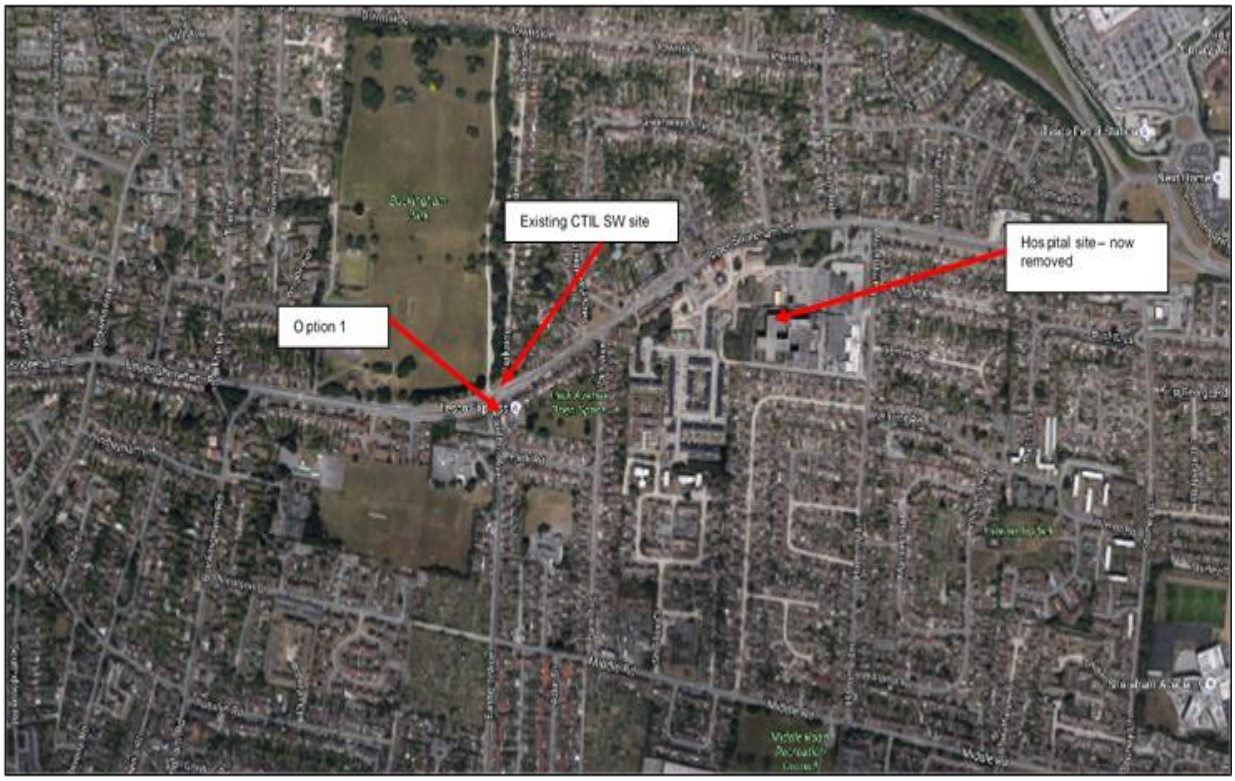
This statement sets out the most relevant considerations in respect of the proposed development. This provides context for the proposal, reasoning, technical justification and planning constraints, policy guidance and alternatives.

1.0 Proposed Development

1.1 The Site

The proposed 17.5m tower will be located on Upper Shoreham Road in front of relatively tall trees that can be viewed along this road. The installation has been proposed in proximity to these trees, as they will provide both screening and backdrop for the proposal, thereby reducing any visual impact which may be caused. The chosen location places the equipment as far from residential areas as much as possible thus reducing any perceived detrimental impact upon visual amenity whilst still providing network coverage to these areas.

Aerial photograph of the proposed location, previous site location & search area



1.2 Application History

The requirement for a replacement mobile phone base station in the Shoreham-by-Sea area is the result of the removal of the previous EE installation that was located on the roof of Southlands Hospital due to redevelopment of the premises, which involved the demolition of the host building.

1.3 The Proposal

The proposal would consist of the installation of a 17.5m high slim line telecommunications tower with 3no. antennas within a GRP shroud, 2no. 300mm dishes and 3no. ground based equipment cabinets and other ancillary equipment thereto. EE is aware of local feelings towards telecommunications development and has made every effort to choose a design solution to minimise the impact on the surrounding area by utilising a slim line column with the antennas in a GRP shroud and dishes located at the top of the mast. It should be noted that by utilising a GRP shroud around the antennas, this negates the need for the structure to have large bracing components associated with other more prominent and conventional installations.

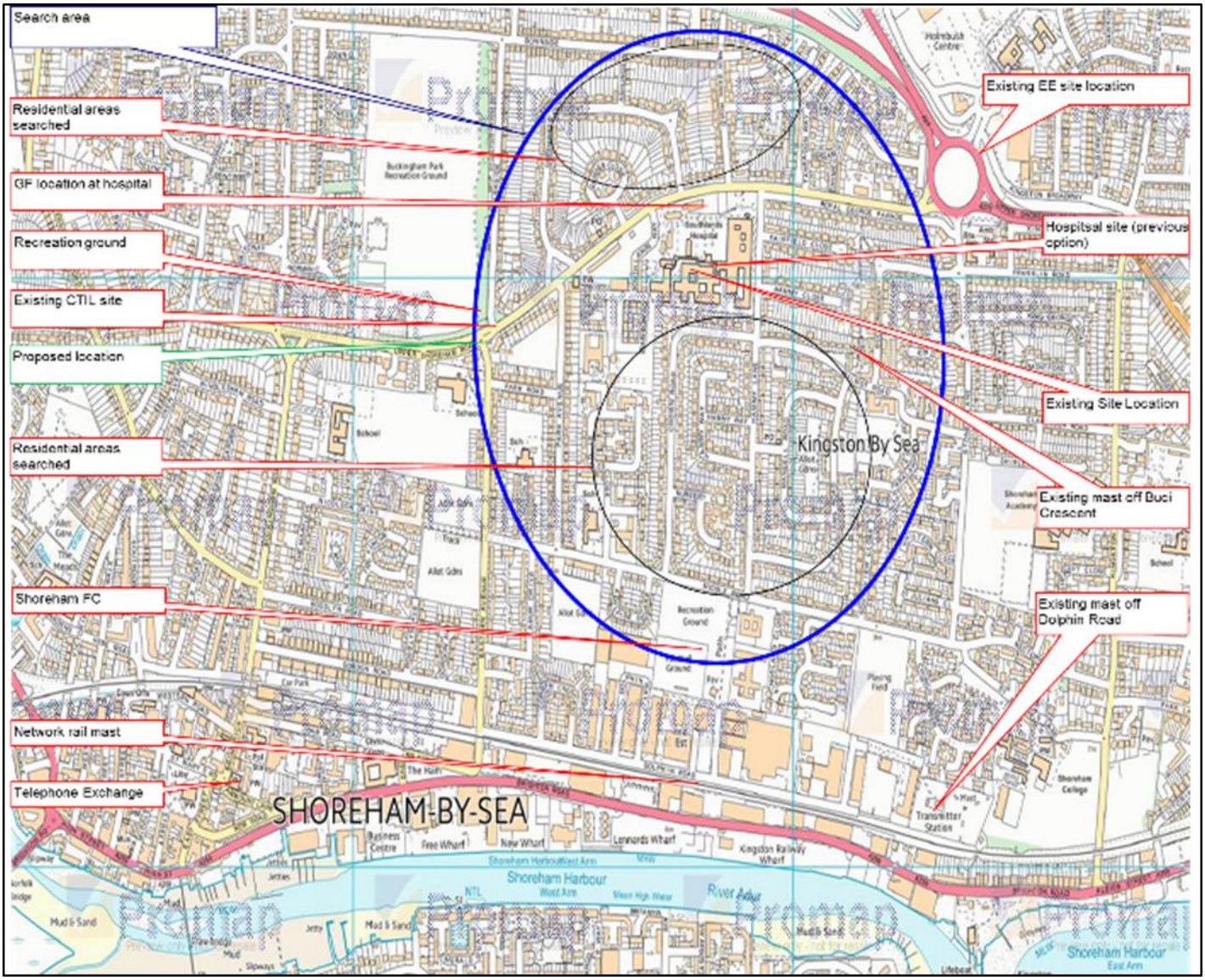
The principal components of the proposed development are outlined in the Supplementary Information Template, and the general layout illustrated on the attached drawings titled: Proposed Site Plan and Proposed North West Elevation.

1.4 Alternative Site Assessment

The table below details the alternative sites to the chosen option that were investigated when searching for a replacement location.

A – Southlands Hospital 2, Upper Shoreham Road. NGR: 523322/105103
This was the location for a previous replacement option. However, the SP was unwilling to offer allow an installation on the roof of the property, as such, this option was discounted from further progression.
B – Existing Arqiva mast off Dolphin Road. NGR: 523322/105103
This site already houses EE Ltd equipment & will not provide the replacement coverage.
C - Telephone Exchange, Tarmount Lane. NGR: 521750/105130
This site is too far from the search area & will not provide the required coverage.
D - Existing Network Rail mast, Dolphin Road. NGR: 523088/105096
Network Rail do not allow a share of their structures. In any case, this site is too close to the existing Arqiva mast which already houses EE Ltd equipment.
E - Shoreham Football Club, Middle Road, Shoreham. NGR: 522804/105370
This option has been discounted as it will not provide the required coverage.
F - Residential areas around Southlands Hospital. NGR's various
There is a lack of pavement width in the residential areas to be able to house street furniture sites, therefore discounted for use.
G - Southlands Hospital, Upper Shoreham Road. NGR: 522840/106134
As with discount A, the hospital trust were unwilling to allow an installation on the property, as such, this option was discounted from further progression.
H - Buckingham Park Recreation Ground, Upper Shoreham Road. NGR: 522280/105931
A very tall structure in the region of 30m tall would be required in this location & in comparison to the proposed option, would be too visually intrusive, so discounted for use.
I - Existing lightweight lattice mast off Buci Crescent. NGR: 523157/105892
This structure is of a very lightweight design and is not capable of being shared. It is also located in the middle of a residential area and any redevelopment of this structure would be too visually intrusive in comparison to the proposed option.
J – Existing CTIL structure, Upper Shoreham Road. NGR: 522295/105922
A share of this existing structure is not possible without adding an extra 5m height. Also and of more relevance, there is not enough publicly maintained ground space to house both the CTIL and EE equipment cabinets.
K – Land to the west of above CTIL structure. NGR: 522295/105922
The only land that was large enough to house the structure and equipment cabinets is not publicly maintained, therefore discounted from use.
There are no other available options within the search area capable of providing the required coverage to Shoreham-by-Sea area.

The discounted sites that were identified as potential replacements are shown on the map below:



1.4 Local Engagement

The site has been rated as amber on the mobile operators' consultation traffic light rating system and consultation was carried out with the local Ward Councillors, the Headteacher and Chair of Governors at St Nicolas and St Mary Church of England Primary School, Eastern Avenue on the 23 November 2016. Given the urgency of deploying this replacement site, responses were requested by the 30 November 2016. As at application submission, no responses had been received.

2.0 Planning Policy

This section sets out the most relevant national and local planning policy concerning the proposed development.

2.1. General Policies

National planning guidance on telecommunications in England is contained in core principle 5 of the National Planning Policy Framework (NPPF 2012), entitled 'Supporting High Quality Communications Infrastructure'. The framework states that the development of high speed broadband technology and other communications networks is fundamental to securing both economic and social wealth. Core principle 5 also states that, when preparing local plans, authorities should support the expansion of such facilities.

Whilst the Government accept that the communications network is essential, it also recognises that the network should be kept to the minimum number of sites required to provide the high quality service required. Use of existing buildings and high structures should be favoured over the development of new mast sites.

2.2. Local Planning Policies

The policy relevant to the determination of this planning application is AB29 of the Adur District Local Plan 1996 which states:

The District Planning Authority will grant planning permission for, or approve the details of, telecommunications development where it can be demonstrated that:-

(i) planning permission is required from the District Planning Authority;
(ii) there is no reasonable possibility of sharing existing facilities; and
(iii) in the case of radio masts there is no reasonable possibility of erecting antennas on an existing building or other structure.

When considering proposals for telecommunications development, whether or not under permitted development rights, the District Planning Authority, whilst respecting operational requirements, will expect the apparatus to be sited, designed, and, where appropriate, landscaped, so as to minimise its visual impact on the environment in which it is located. Such masts will not be permitted where they would be visible in the wider landscape within the Area of Outstanding Natural Beauty except where special siting needs attributable to technical requirements, such as transmission range or line-of-sight, dictate otherwise.

Assessment against Policies:

In consideration of the NPPF and the Local Policy, it is our belief that the development proposal meets the requirements of national and local policy whilst having regard to technical and operational factors and providing the necessary level of coverage to this part of Shore-by-Sea.

The Alternative Site Assessment demonstrates that there are no available existing structures in the immediate locale that can be utilised.

As previously mentioned, EE Ltd requires a site for a replacement installation in this location to again maintain coverage that has been lost as the previous installation has been removed and not yet replaced.

This therefore currently has an adverse impact on those that rely on this vital service and coverage from an economic, social and environmental perspective. Not least the Emergency Services who from mid-2917 will also be reliant on the coverage the proposed replacement installation will provide.

An alternative site assessment has been submitted within this planning statement that clearly outlines that other sites have been identified, researched and considered not to be appropriate. Ultimately, this is the only location where the installation can be located.

We would again reiterate that we believe that we have demonstrated that the telecommunications development, having regards to the technical and operational constraints, has been designed to minimise environmental and visual impacts through careful sitting and design choices. The proposal complies with both national and local planning guidance and as such it is considered to provide the best location from both a technical and town planning view.

Any information required regarding location, height of antennas, frequency etc. can be found in the supporting documents, which are submitted as part of this prior approval application. As noted above, an ICNIRP certificate has also been enclosed. We are of the opinion that this proposal is compliant with all relevant planning policy, as noted above, and could therefore be supported by your department.

3.0 Access

Under section 42 of the 2004 Act, access requirements both to and around the site should be considered. It must be considered that this site is for telecommunications purposes only. In principal, no access to the cabinets or the mast is allowed and as such access requirements are not considered an issue.

3.1 Construction and Maintenance

Access to the site is taken from Upper Shoreham Road. Maintenance visits are required approximately every 6 months by an operative with a light vehicle. Consequently, it is not envisaged that access to the site would cause traffic management or other issues. During the construction process all build and maintenance regulations will be complied with. Proof of compliance can be confirmed closer to the time of construction if necessary.

3.2 Public Access

Radio base stations are not designed to be accessible by the public. The equipment cabinets would be locked at all times and only accessible by authorised persons. Therefore, no specific public access provisions are required to be incorporated into the design of the proposal.

4.0 Regulatory Statement

EE is authorised to operate a public electronic communications network and supply public electronic communications services under the provisions of the Telecommunications Act 1984, the Communications Act 2003 and the Electronic Communications Code (Conditions and Restrictions) Regulations 2003 and aims to meet all reasonable customer demand for that service.
OFCOM statistics show that in 2013 mobile phones are owned / used by 92% of UK adults. This demonstrates the vital role mobile communications play in the social and economic wealth of the country. Whilst the vast majority of the UK now benefits from mobile coverage there are still spots without coverage. EE under their communications code licence to run a public communications network are duty bound to provide equal coverage to all areas of the UK. This is why the need for communications systems should not be tested by Local Planning Authorities, as it is for the communications code operators to determine locations where coverage is required and demonstrate in evidence.
The development proposed is to once again maintain coverage as a result of the removal of the previous installation that was located at Southlands Hospital.

5.0 Health and Safety

Telecommunications planning guidance states that it is not for the local planning authority to seek to replicate through the planning system controls under the health and safety regime as it is a matter for the Health and Safety Executive. The Government guidelines state that provided a proposed base station meets the ICNIRP guidelines for public exposure, then it should not be necessary for the local planning authority to consider the impacts of health concerns.

It is confirmed that the proposed equipment and installation complies with ICNIRP guidelines and a Declaration of Conformity has been submitted in support of the application.

6.0 Conclusions

The telecommunications installation proposed as set out in this application has been designed and sited having regard to technical, engineering and land use planning considerations in order to minimise its impact on the local environment. The mast height has been kept to the minimum required to ensure operational efficiency - a structure of 17.5m is needed in this locality because of the local topography and tree cover and the transmission dishes are required to be above the height of the trees in order to achieve line of sight with other installations in the network. Consideration has been given to the design of the mast and this is reflected in the slim line column design.

In relation to planning policy, in accordance with the guidance set out in the NPPF and Local Policy, a thorough search of the area has been undertaken and revealed that there are no existing masts or other structures suitable. Therefore, the development of a new replacement mast site is justified. In addition, national policy clearly states that any development which seeks to improve telecommunications infrastructure should be supported in principle.