Recd 15/12/06

Supporting Statement

in respect of GPDO application

On behalf of Orange PCS Ltd

Re: Land off Brighton Road
Shoreham by Sea
West Sussex
BN43 5YB

Our ref: WSS172

29 November 2006

Harlequin Limited
1 Abbey Wood Road
Kings Hill
West Malling
Kent ME19 4YT

Tel: [redacted]

1.0 Introduction

This statement forms part of an application submitted on behalf of Orange PCS Limited. It has been prepared in accordance with the requirements of Section 42 of the Planning and Compulsory Purchase Act 2004 which requires the submission of a Design and Access Statement to accompany planning applications.

2.0 Proposed Development

2.1 The Site

The proposed development is situated on Brighton Road in Shoreham by Sea. The proposal is located approx 500m away from Shoreham Airport and 50m away from Adur Recreation Ground, nearby is Norfolk Bridge which runs over the River Adur.

The previous application ADC/0136/06 failed planning as the site was believed to be too open and lacked any screening, combined with the obtrusive design of the antenna. It was also thought to detract from the environment and the strategic gap of the country and was not the least environmentally-harmful option available.

The immediate environment surrounding the new proposal is relatively flat, therefore the coverage which is required for the dense residential area of West Shoreham and to the busy arterial links in the locality will be provided by the site. The River Adur sited to the South of the proposed installation will be screened, aided by the pole being coloured chocolate brown and the cabinets ivy green to merge with the backdrop of trees.

Unlike the previous application a subtle location and stealth design has been chosen; the proposed 12m mini macro structure has been placed to fit in with the rhythmic existing Brighton Road street furniture. The height of the proposed installation is required from a technical point of view yet has been designed to be line with the trees behind the structure, the antennas have been shrouded to replicate the T-Mobile installation and the cabinets have been set back in the grass to create the least visually intrusive option possible.

Orange propose to install minimalist apparatus still allowing the paths to be fully operational for pedestrians. There is a large blue cabinet on the opposite side of the road behind T-Mobile's equipment, Orange's presence will have little impact to the area compared to existing cabinets along Brighton Road.

Even though the recreation ground is to the North, the new setting is the best alternative to serve its purpose from a town planning view. The site is not within any land designation and the Shoreham Airport Manager and Highways Authority have approved the sites location.

2.2 The Proposal

Consideration has had regard to technical, engineering, environmental and land use planning considerations within the design of the proposed installation.

The principal components of the proposed development are outlined on the Supplementary Information Template, and the general layout illustrated on the attached site layout plan and elevations (Drawing Numbers WSS172/10a Revision A)

The proposed development consists of a new 12m column with 3 shrouded antennas and 4 equipment cabinets at ground level. It is proposed to shroud the antennas to make them less obtrusive to the area and not detract from the environment compared to the prior application.

The proposal has been sited to provide coverage predominately to the dense residential area of West Shoreham and the busy arterial routes, set against a backdrop of trees to screen the installation.

Orange is aware of local feelings towards telecommunications and has made every effort to allow for local concern with this application, by utilising an innovative design solution and minimising the amount of equipment, the effect of the installation will be reduced.

3.0 Access

3.1 Construction and Maintenance Access

Brighton Road provides the access to the site. It must be taken into consideration that this road can become very busy and construction may cause disruption to the regular motorists, therefore a traffic scheme will be implemented. Parking of the construction vehicles will be carefully decided to cause as little disturbance to the area as possible. Maintenance is only required every 4/5 months and can be completed on foot and therefore little interference to the surroundings will occur.

During the construction process all build and maintenance regulations will be complied with and this can be confirmed closer to the time of construction if required. Details of the access route are indicated in the drawings submitted in the application.

3.2 Public Access

Radio base stations are not designed to be accessible by the public. Therefore no specific public access provisions are required to be incorporated into the design of the proposal.

4.0 *Regulatory Statements*

Orange is authorized 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.

Despite the already high level of penetration the totals number of reported mobile customers in the UK continues to grow. At the end of March 2004 the five UK Network operators reported a combined customer base of 54.7 million compared to 49.7 million a year previously[1].

In 2003, average household expenditure on mobile telecoms services (calls and text messaging) was greater than expenditure on fixed voice services |calls and access) for this first time.

As at the first quarter 2004, the Orange UK customer base stood at nearly 14 million, a 67% increase since 2000 and consolidates Orange's position as the number one UK operator in terms of active customers.

5.0 *How the System Works*

I enclose a self-explanatory document entitled 'Network and 3G information'. This has been produced by Orange and explains how mobile phones work, the technical issues behind the siting of base stations and also introduces the new system commonly referred to as 3G or Third Generation.

---

[1] The Communications Market 2004 – Telecommunications August 2004 (Ofcom) [3] Can be viewed on the Mobile Operators association (MOA) website http://www.mobilemastinfo.com/planning/ten_commitments.pdf

6.0 *Pre-application Consultation*

6.1 Local Planning Authority

A pre application was sent to the Head of Planning on the 16th October via recorded delivery. The letter explained the proposal and asked for their comments. No response was received.

6.2 Public Consultation

In line with the ten Commitments of the Mobile Operators Association (MOA)[3] the site was rated according to the traffic light model.

The site was rated amber therefore consultation was held with
Cllr Parkins
Cllr Harding
Cllr Williams
Mr Wickens, PC

A voluntary notice was displayed on site; there were letters from 3 of the residents objecting on grounds of health and visual amenity in a residential area, and one letter from the Shoreham Beach Residents Association. They seemed confused about why we are re-applying in the same area; with the use of drawings the CLO responded. The site has been located in a new area with adequate screening unlike the previous application and the antennas will now be shrouded to cause the least visual impact to the area.

6.3 Schools/Colleges

The nearest educational facility is Shoreham First School due to its distance of over 600m to the proposal no consultation was held.

6.4 Civil Aviation Authority

Shoreham Airport is approx 500m from the proposed location. David Vine approved the location on the behalf of Shoreham Airport on the 20 October 2006.

7.0 *Planning Policy*

7.1 General Policies

National guidance on telecommunications in England is contained in Planning Policy Guidance Note 8 (PPG8).
An indication of the importance the government attaches to telecommunications can be gauged from the first paragraph of the Appendix 'Modern telecommunications are an essential and beneficial element in the life of the local community and in the national economy.

7.2 Specific Policies

Site Sharing
There are no sites in the locality which could be site shared to provide the necessary coverage.

Existing building or structure
The use of an existing building or structure was extensively investigated. However there were no suitable buildings or structures available. Evidence is given in Section 9 below (paragraph 21).

There were no existing buildings or structures that could be utilised.

New mast
Although PPG8 stipulates that use should be made of existing buildings or structures to site new antennas there were none with willing site providers that satisfied our technical requirements and therefore a new mast is the only option in this area. Evidence is required and this is set out in Section 9 below (paragraph 21).

Co – location
PPG8 attaches considerable importance to keeping the numbers of masts to a minimum in order to limit the visual intrusion. It does not, however, say that mast sharing is always the preferred option. In paragraph 20 it state that the 'sharing of masts and sites is strongly encouraged where that represents the optimum environmental solution in each particular cases.'
Can be viewed on the Mobile Operators Association (MOA) website http://www.mobilemastinfo.com/planning/Ten_Commitments

Due to specific coverage required by Orange, there was no available telecoms structure that could be utilised, however we have attempted to minimise the impact of the installation by siting it away from the main residential area and by utilising a stealth design similar to existing street furniture. This will also allow the installation to blend in with the existing street works and the T-Mobile site which is located approx 50m away.

Innovative Design Solutions
PPG8 encourages authorities and operators to work together and use sympathetic design and camouflage to minimise the impact of development on the environment. Particularly in designated areas the aim should be for apparatus to blend into the landscape. The telecommunications industry is encouraged to continue to develop innovative design solutions, in terms not only of the structure of mats and antennas but also the materials and colouring.

The proposal is to stimulate the existing street furniture and T-Mobile installation; it has been kept to a minimal height and sited against trees to act as a backdrop. The installation will be painted to blend in with the surroundings and the cabinets have been located so that they are out of direct view to the road side. Views from Norfolk Bridge and Brighton Road will not be obscured because the installation is set back from the road and it will be adequately screened and coloured to match the rhythm of the existing street furniture.

Residential Property
The site is away from the main residential area, it is thought the installation will have a minimal impact due to the height and type of structure proposed.

General
It is important to recognise that the proposed development is permitted, in principle, by Part 24 of the GPDO.

Thus the legal and policy context for the proposed development (through PPG8 and the GPDO) weighs in favour despite its possible visual impact, PPG8 therefore provides general support for the proposal.

8.0 Local Planning Policies

General
In considering the design and siting of the proposal full regard has been had to local planning policies and guidance.

Status of Local Plan:

Adur District Local Plan 1996

Relevant Policies:

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 possibly of erecting antennas on existing buildings or other structure.

When considering proposals or 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 minimize 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 of the proposal against the policy criteria:

It is our belief that this proposal meets with the requirements of the local plan policy for the following reasons:-
The site is not within any land designation therefore is a GPDO application which can be determined by the council within 56 days of the application received.
All near-by masts have been investigated and none can be site shared.
All buildings have been explored in the locale and none can be utilised.
Compared to the previous application which failed on design and siting reason, this proposal is thought to have the minimal impact possible whilst being the best solution from a technical point of view and town planning. The installation is at 12m to simulate the design and rhythm of the existing street furniture and the antennas will be shrouded to make them less obtrusive to the area. The proposed installation and cabinets can be colour coded to match the backdrop and existing street works.

Land Designation Policy
The site is located on land without any special designation and as such no extra consideration was necessary.

Assessment against land designation policy
We are of the opinion that this proposal is therefore fully compliant with the telecommunications and landscape policies outlined above in all respects.

9.0 Technical Justification

The technical justification for the proposed site is attached separately to this application.

10.0 Area of Search

I attach a map to highlighting all discounted options.

11.0 Consideration of Alternatives

The proposed location – **Land off Brighton Road, Shoreham by Sea, West Sussex**

1. **Riverside Business Centre installation**

This site gained planning approval in December 2004 (SU/242/04/TP) for a 15m column within a compound. The landowner pulled out of negotiations with Orange. The site provider has been approached to resurrect the installation but is not interested in housing any telecoms equipment.

2. **Adur Recreation Ground**
This option was felt to be more visual than the proposed installation plus is within a floodplain.

3. **T – Mobile installation along the A259**
This installation is a street furniture design which Orange are unable to site share with due to technical restraints.

4. **New Salts Farm**
There was no response to correspondence sent, therefore this option could not be pursued.

5. **South Saxon Kennels**
There was no response to correspondence sent, therefore this option could not be pursued.

6. **Street furniture options along Shoreham Road**
There is not enough room for a proposal along this stretch of road. It was also thought to be more visually intrusive compared to the proposal.

7. **Antiqraft, Unit 5**
There was no response to correspondence sent, therefore this option could not be pursued.

8. **Accurate Die –Cast, Unit 4**
There was no response to correspondence sent, therefore this option could not be pursued.

9. **Gloucester Sales Room, Unit 11**
There was no response to correspondence sent, therefore this option could not be pursued.

10. **O2 installation at Shoreham Airport**
There are legal restraints to allow other telecom users to share the O2 mast therefore can not be progressed. The site would also have to be increased in height to provide the required level of coverage for Orange will impact on the airports exclusion zones.

11. **E Written and Sons, Unit 7**
There was no response to correspondence sent, therefore this option could not be pursued.

12. **Burrell Arms**
There was no response to correspondence sent, therefore, the site could not be pursued. The proposed site here was to be a microcell installation such as patch antennas on the chimney stacks of the building.

13. **Aston Court Flats**
A response was received from Mr Pannell, Head of Housing at Adur District Council and they are not interested in a proposal. The flats are council owned.

14. **M and S Car Sales**
Not sufficient room for an installation.

15. **Vodafone installation on Rail Track land**
Orange are unable to agree terms with Union Rail to co-locate with the installation. Vodafone have restrictions within their agreement which does not allow them to site share.

16. **Surrey Court and Mannings Court**
These are council owned therefore cannot be pursued; Mr Pannell has confirmed that the council are not interested in proposals on roof space.

17. **BT building**
There are 2 operators on the rooftop at present; Orange cannot agree terms with CCI who are the agents for BT buildings therefore cannot be pursued.

18. **Land off Brighton Road**
This site failed planning (Application No: ADC/0136/06) due to lack of screening combined with the design of the antennae and believed that it was not the least environmental harmful option available.

19. **Ropetackle Housing Development**
After numerous calls made to the site manager, Andrew Morrish no response has been received.

There were no other suitable existing masts, buildings or other structures with willing site providers that satisfied the technical constraints.

12.0 Health and Safety

PPG8 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 health effects and concerns about them.

I can confirm that the proposed base station will comply with ICNIRP guidelines and I have attached the Certificate of Compliance.

However, I am aware over perceived health and safety issues concerning radio frequency emissions and for this reason I have enclosed a separate Health and Safety statement.

13.0 Conclusion

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 proposal will provide good coverage to an acknowledged area of current poor coverage. The proposed design and distance from residential properties is thought to keep the visual impact to a minimum on the locality. Accordingly, the proposed development is considered to conform to national and local planning policies.

Compared to the previous application (ADC/0136/06) the location has been moved to an area which is not as open and with a backdrop of trees is screened from its surroundings. The proposal blends in with the rhythm of the existing street furniture and T-Mobile installation, and the antennas are shrouded to make them less obtrusive, therefore will not detract from the environment.