

Design, Access and Supporting
Statement in respect of
GPDO Application
On behalf of EE Ltd

Northbound Footpath at Borrass Road
Wrexham
LL12 7EG.



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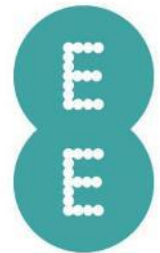


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Rev	Originator	Approved	Date
0	Name	Name	Day/Month/Year
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Introduction

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 for a new 15-metre-high street works slim pole with GRP shrouded antennas and other associated equipment to be located on the northbound footpath at Borrás Road, Wrexham. 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.

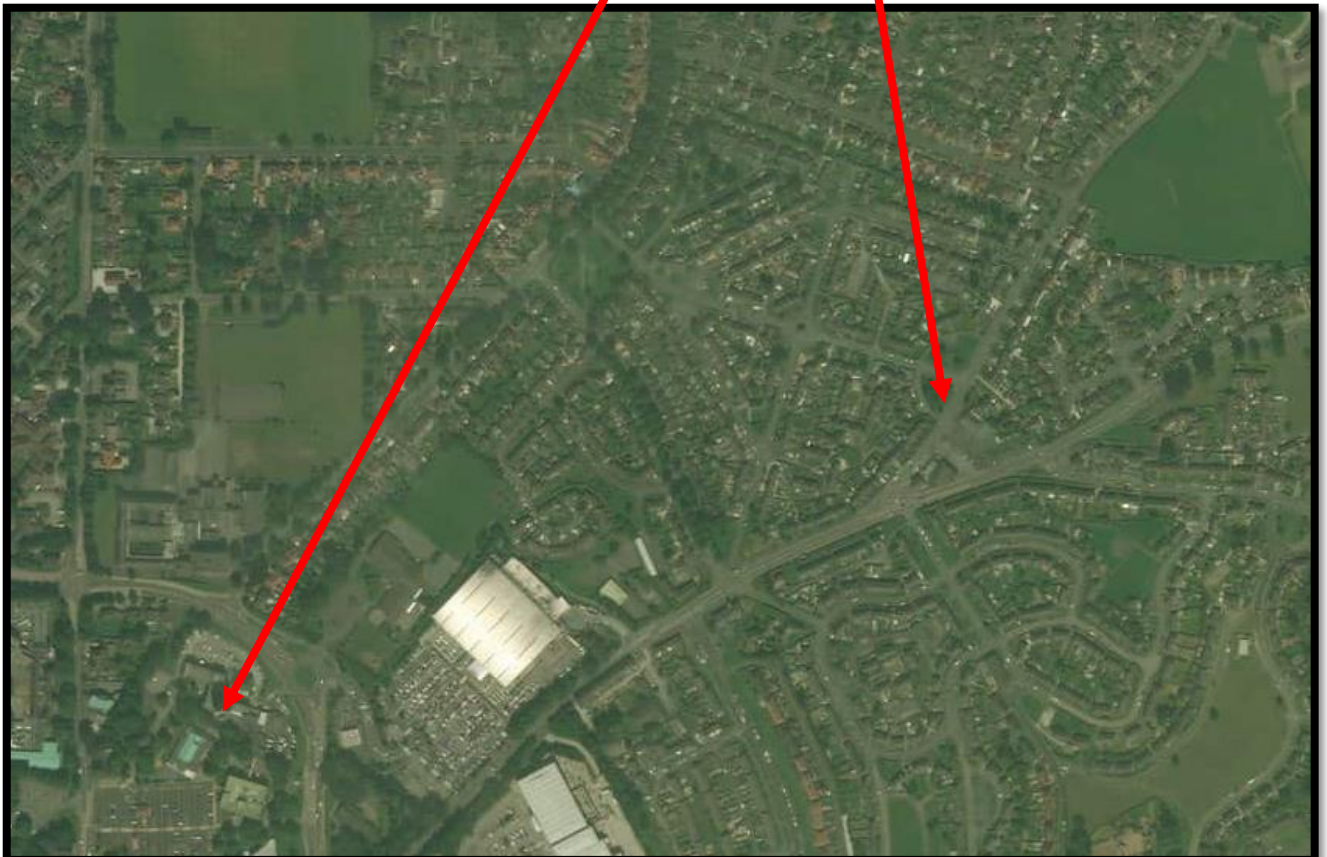
1.0 Proposed Development

1.1 The Site is proposed on the northbound footpath at Borrás Road, Wrexham.

The proposed 15m street pole installation with GRP shrouded antennas will be located on the northbound footpath at Borrás Road, Wrexham. The proposed site is to be situated on the footpath opposite two retail units. There is grassed area with some tree screening which act as a natural division between the site and the residential properties behind it.

The installation has been proposed at this location to maintain the network coverage required for the area once the existing cell site CLY0001 is removed as the Police HQ building is to be demolished. The slim streetpole with shrouded antenna has been selected as the most suitable replacement in this area as it has been designed specifically for deployment into urban areas and is in context with the surrounding street furniture. This position has been chosen opposite the two retail units and car park as it will have the least impact on the surrounding residents.

Aerial photograph of the previous location & proposed location



1.2 Application History

The requirement for a replacement mobile phone base station in this area of Wrexham is the result of the existing site (CLY0001) having to be decommissioned. CLY0001 has a total height of 47m and is situated on the rooftop of Wrexham Police Station, Bodhyfryd. EE Ltd.'s Radio Planners have confirmed that as there are no similar height structures to relocate onto. Therefore, two replacement cells are required to maintain and improve existing coverage.

If CLY0001 cannot be replaced, then upon its removal existing users of the network's voice and data services would experience a reduction or loss of coverage in this area. From mid-2017 these users will include the Emergency Services as EE have been awarded the contract to provide network coverage for all the blue light services.

1.3 The Proposal

The proposal consists of the installation of a 15m high telecommunications slim streetpole, 3 No. antennas with GRP shroud, 2 No. 0.3m dishes, 3 No. ground based equipment cabinets and other ancillary equipment on the existing public footpath.

To minimise the contrast between the equipment and surrounding street furniture, it is proposed that the installation and ancillary equipment are painted Grey (Ral7009). If during the life of the application an alternative colour is identified as preferable, then this can of course be implemented instead.

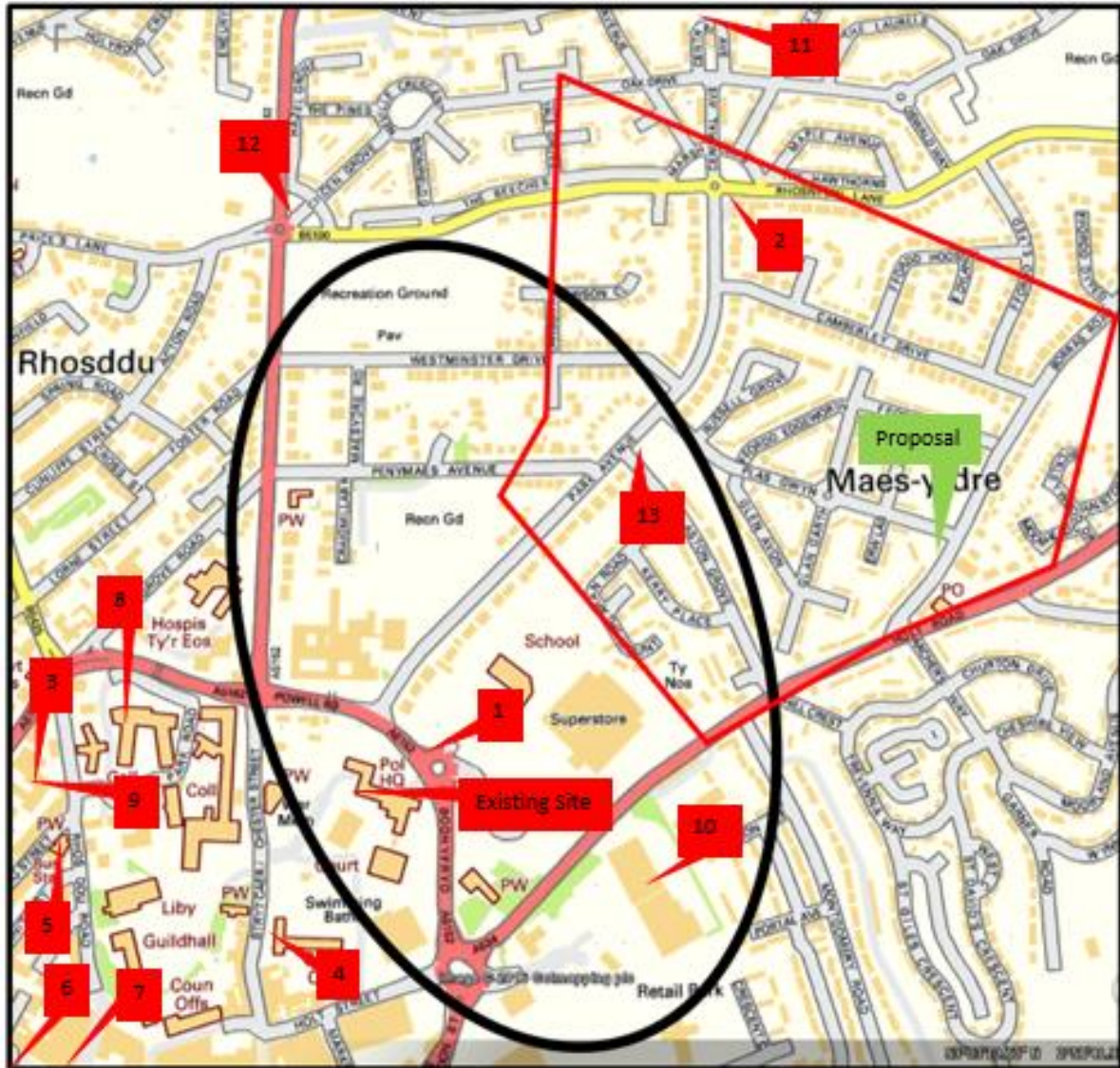
EE is aware of local feelings towards telecommunications development and has made every effort to choose a design solution to minimise the impact on the surrounding area by utilising a slim street pole with GRP shroud. The principal components of the proposed development are outlined in the Supplementary Information Template, and the general layout illustrated on the attached drawings titled: Proposed Site Plan and Proposed Elevation Plan. As part of its pre-application consultation EE attached 3 VCN's onto the street furniture surrounding the proposed site inviting comment on the proposal. No comments were received from members of the public or from local Councillors who were also consulted prior to the submission of the application.

1.4 Alternative Site Assessment

The table below details the initial search area (in black) which focused on trying to site on a building of similar height to the police headquarters, however as the tallest buildings are sub 25m radio analysis determined that two sites would be required and the red area was also searched so that the cell could be split.

The two searches identified 15 potential locations, 13 of which have now been discounted due to technical /operational requirements and land ownership issues. The other replacement cell site is 92202 Peoples Market Car Park details of which will be in a separate planning application

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



1 – VF 55490 – Approx. NGR: E: 333799 N: 350735

Non- shareable SW structure with no room for additional cabinets.

2 – O2 34659 – Approx. NGR: E: 334181 N: 351385

Non- shareable SW structure with no room for additional cabinets.

3 – O2 1913 \ Airwave NWA098B – Approx. NGR: E: 333346 N: 350710

Radio Planner has confirmed that this site would not provide the required coverage.

4 – Crown Buildings – Approx. NGR: E: 333636 N: 350522

The antenna height that can be achieved on this building is less than at Peoples Market Car Park - 92202.

5 – Trinity Church - Approx. NGR: E: 333392 N: 350623

The building lends itself to potentially hosting face mounted antenna however they would be 10m lower than at Peoples Market Car Park - 92202.

6 – St Marys Catholic Cathedral – Approx. NGR: E: 333159 N: 350472

The limited orientation achievable and the reduction in land height meant that this site did not offer the same coverage or capacity of the proposal.

7 – Regent House – Approx. NGR: E: 333126 N: 350562

The antenna height that can be achieved on this building is less than at Peoples Market Car Park - 92202.

8 – College Cambria – Approx. NGR: E: 333484 N: 350762

The antenna height that can be achieved on this building is less than the proposal.

9 – Wrexham Telephone Exchange – Approx. NGR: E: 333361 N: 350676

Radio Planner has confirmed that this site would not provide the required coverage.

10 – Roxburgh Hill House – Approx. NGR: E: 333310 N: 350344

The antenna height that can be achieved on this building is less than at Peoples Market Car Park - 92202.

11 – Oak Drive SW – Approx. NGR: E: 334163 N: 351544

The Councils online records show the grass verge as adopted. However, further investigations have confirmed that this is not the case. Elevated photos show that the mast would have to be more than 20m to clear the surrounding trees which is unlikely to be acceptable to the Councils planners in this low rise residential area.

12 – Chester Road SW – Approx. NGR: E: 333643 N: 351369

Radio Planner has confirmed that this site would not provide the required coverage.

13 – Aston Grove SW – Approx. NGR: E: 334057 N: 351072

Radio Planner has confirmed that this site would not provide the required coverage.

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 planning authority, the local highways authority, the ward councillor and 3 Voluntary Consultation Notices were placed in Borrass Road to notify the nearby residents. No responses were received from either the VCN's or Councillor letters.

The Highways authority have confirmed that they have no issues with the equipment being sited at this location.

Matthew Phillips (Planning Control Lead) raised points about siting, visual impact, and requested coverage plots. These points are addressed in this document and the Supplementary Statement.

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 Wales is contained in Chapter 12 of the Planning Policy Wales (PPW) (Edition 9, November 2016), entitled 'Infrastructure and Services'. The framework states that the development of high speed broadband technology and other communications networks is fundamental to securing both economic and social wealth. Chapter 12 also states that, when preparing local plans, authorities should support the expansion of such facilities.

PPW Chapter 8 states that "The Welsh Government recognises that widespread access to affordable, secure telecommunications infrastructure is important to citizens and businesses across Wales. It is important that the telecommunications infrastructure in Wales is able to meet this challenge, helping to build a thriving and prosperous Welsh economy."

2.13.2 Where approval of details of planning permission is required the following should, be taken into account for telecommunications related planning applications:

- *the extent to which radio and telecommunications masts can be shared; and*
- *the need for dishes and other installations to blend with their backgrounds.*

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 proposal complies with the Wrexham County Borough Local Development Plan (LDP) 2013-2028 Preferred Strategy- February 2016.

Policy SP1: Economic growth, employment and enterprise

- Support the delivery of high speed broadband infrastructure across the Borough, and provision of adequate telecommunications.

Assessment against Policy

As demonstrated, the proposal complies with both the Planning Policy Wales (PPW) and Wrexham County Borough Local Development Plan (LDP), in that one of the two replacement sites (92202) is proposed to be sited on an existing building. However, as there are no other 47m high structures to site on in the city centre a second cell is required, this proposal and a search has concluded that there are no existing shareable sites or existing buildings to locate onto therefore a new site is required.

Consideration has been given to the type of equipment to be deployed and where it is to be sited, opposite a car park and two retailing units.

As previously mentioned, EE Ltd requires a site for a new installation in this location in order to maintain coverage which will be reduced or lost when the original installation is removed because of the redevelopment of the site.

This therefore 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 will also be reliant on the coverage the proposed installation will provide from mid-2017.

We would again reiterate that we believe that we have demonstrated that the telecommunications development, having regards to the technical and operational constraints, have been designed to minimise environmental and visual impacts through careful siting and design choices as set out in. 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 fulfilling the requirement of national policy and LDP. 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.

3.1 Construction and Maintenance

Access to the site is taken from Borrás 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 address such an area of poor coverage as a result of the removal of the current installation which is approximately 700m to the west.

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 Certificate of Compliance 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 15m is needed in this locality due to surrounding clutter. Consideration has been given to the design of the mast.

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