

DESIGN AND ACCESS & HERITAGE STATEMENT

**Alton Towers,
Alton Towers,
Stoke on Trent,
Staffordshire,
ST10 4DB**

This Design and Access and Heritage Statement is provided in conjunction with the Supplementary Information Template, drawings and supporting material that was submitted with this planning application [and application for listed building consent]¹.

This statement is submitted pursuant to Article 4C of the Town and Country Planning (General Development Procedure) Order 1995 (as amended) [and Regulation of 3A of the Planning (Listed Buildings and Conservation Areas) Regulations 1990 (as amended)]².

In accordance with the Code of Best Practice on Mobile Phone Network Development³, and published Government guidance, this proposal was drawn up having regard to the need for good design.

In particular:

- Considerations of design and layout are informed by the context, having regard not just to any immediate neighbouring buildings but the townscape and landscape of the wider locality. The local pattern of streets and spaces, building traditions, materials and ecology all help to determine the character and identity of the development.
- The scale, massing and height of proposed development have been considered in relation to that of adjoining buildings; the topography, the general pattern of heights in the area; and views, vistas and landmarks.

The following general design principles have been taken into account in respect of this proposed telecommunications development:

- A proper assessment of the character of the area concerned.
- That the design shows an appreciation of context;

¹ Delete as appropriate.

² Delete as appropriate.

³ Paragraphs 120-126.

SITE CONDITIONS, TECHNICAL CONSTRAINTS, LANDSCAPE FEATURES AND CAPACITY REQUIREMENTS

Introduction

It needs to be borne in mind that the proposed development is for a mobile telecommunications installation. Hence, access is deliberately restricted, where appropriate, for the security of the installation.

Pre Application Discussions and Negotiations

Prior to the submission of this application the applicant initiates pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues. Further consultation was undertaken with the below:

Councillor for Alton Ward Councillor Hayley Plimley The Parish Clerk, Carmen Giuliano Worthington, Farley Parish Council

Documentation Submitted with Application

- Plans and elevations
- Any other relevant illustrations or photomontages
- Supporting statement

Design Component

This is a highly constrained cell search area. The proposed site is located at Alton Towers, Alton Towers, Stoke on Trent, Staffordshire, ST10 4DB. There is now a requirement to upgrade the CK Hutchison Networks (UK) Ltd (Three) network to provide improved coverage and capacity, most notably in relation to 5G services. This proposal is for an upgrade to an existing site at Alton Towers. Three are in the process of building out the UK's fastest 5G network. Three has 140MHz of 5G spectrum (and 100MHz of it contiguous), which means our service will be much faster and able to handle more data. To bring this new technology to the people CK Hutchison Networks (UK) Ltd will need to provide a mix of upgrades to existing sites and the building of new sites. New sites will be needed for many reasons, including that the higher radio frequencies used for 5G do not travel as far as those frequencies currently in use and that sometimes not all existing sites can be upgraded. In this area there is an acute need for a new mast to deliver the above.

It should be noted however, that the nature of 5G and the network services it provides, means the equipment and antennas required are quite different to the previous, and existing, service requirements. In particular, the nature of the antennas, and the separation required from other items of associated equipment, is such that it cannot utilise some existing structures that provide an installation for another operator, most notably in a street works or highways environment.

This equipment is considered unlikely to have any material impact on the local area but significant connectivity improvements which is a material consideration in the judgment of the site's suitability. The cell search area was assessed at the Survey stage from a planning and residential amenity perspective. The planning constraints (where there are any) have shaped the location of the proposal. The planning analysis and overview of the sites planning designation is captured below. Figure 1-3 illustrates the site and the surrounding area.

Figure 1:



Figure 2:



Figure 3:

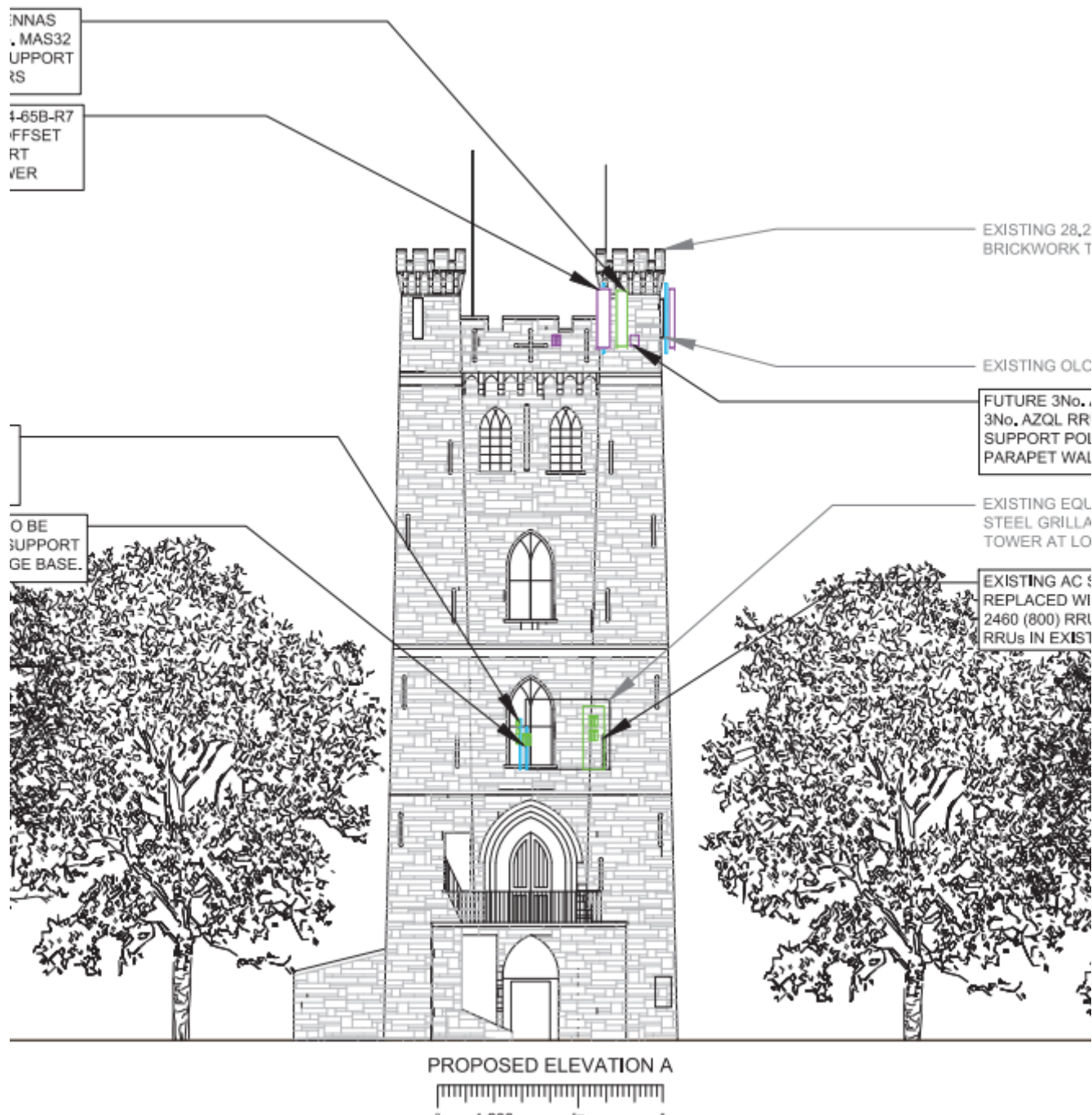


Policy Analysis:

WHP Telecoms Ltd is a company registered in England and Wales (Company Registration Number 360 1208)
Registered Office: 401 Faraday Street, Birchwood Park, Warrington, WA3 6GA. VAT Registration 293349081.

Design and Access Statement (England) v.2 20120103 2012 Cornerstone

The applicant appreciates that the building is listed. For this reason, the visual impact of the proposal has been kept to an absolute minimum. The proposed works are not to the visual detriment of the surrounding area (being suitably distant from sensitive receptors). The proposal would not result in demonstrable harm to the character of the immediate or wider area; but are vitally necessary to ensure improved delivery of service. Capacity and coverage are the key drivers for this new 5G installation. The proposal would respect and continue to maintain the character of the area, would be suitably distant from potentially sensitive users, and so would accord with the principles of the Development Plan policies. It fully accords with the requirements of the NPPF.



Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 124) of the National Planning Policy Framework. It states:

“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

In keeping with the National Planning Policy Framework (NPPF). guidelines of using: “high quality communications” (Section 10), the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing built environment.

Economic and Social benefits of 5G:

A recent CK Hutchison Networks (UK) Ltd Planning Appeal approval (Reference: APP/G4240/W/20/3263529) makes specific reference to the Economic and Social benefits of 5G telecommunications equipment.

“There would be clear economic and social benefits associated with allowing the telecommunications development in accordance with paragraph 112 of the Framework.”

Access

Access to the development is by definition limited to the operator and its authorised agents.

Access to the compound containing the base station will be obtained via

Listed Building Consent Statement⁴

This Design and Access Statement is submitted to support an application for listed building consent. In submitting this application specific regard has been had to the statutory tests contained in the Planning (Listed Building and Conservation Areas) Act 1990, published Government guidance and the Code of Best Practice on Mobile Phone Network Development.

In submitting this application, special attention has been paid to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.

Particular regard has been had to the historic and special architectural importance of the building and particular physical features of the building that justify its designation as a listed building and the buildings setting.

This specific proposal forms part of an integral requirement for CK Hutchison Networks (UK) Ltd to expand its 5G telecommunications network across Stoke on Trent specifically in this instance to enhance 5G coverage levels and network capacity within the Staffordshire area.

Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using their mobiles in their homes and this means we need to position base stations in, or close to, residential areas.

A further limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the

⁴ Only relevant in the event of a Listed Building Consent application. Otherwise this section should be deleted.

surrounding base stations to provide continuous network cover as users move from one cell to the other. However, if this overlap is too great unacceptable interference is created between the two cells.

Siting

We have considered the detailed siting and design carefully to ensure that the scheme has a limited impact on the locality and general visual amenity.

Visual appearance

We would repeat that we have carefully placed and designed the scheme to ensure the principles of good siting and appearance are adhered to. The overall impact of the installation on the environment is limited.

DEVELOPMENT PLAN POLICY.

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, it is stated that:

“Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise.”

NATIONAL PLANNING POLICY

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF July 2019) sets out the Government’s planning policies for England and how these are expected to be applied at the Local level. It provides a framework within which local people and their accountable Councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including: -

- Economic Role – contributing to building strong, responsive and competitive economy;
- Social Role – Supporting strong vibrant and healthy communities; and
- Environmental Role – Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. The NPPF recognises the vital importance of high-quality telecommunications and dedicates a whole chapter to this. Chapter 10 of the NPPF outlines the Governments support for high quality communications. The paragraphs below clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 112 states:

“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high-quality digital infrastructure, providing access

to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution)."

It continues in Paragraph 113:

"The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate." Operators always follow the sequential site selection process. Where an existing site can be shared or upgraded this will always adhered to before a new proposal is put forward for consideration. In this instance there is no scope to upgrade an existing mast nor site share.

The support for telecoms and the need not to constrain Operators is laid out in Paragraph 116:

"Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure."

Conclusion

We consider that the development is compliant with the council's policy and that in accordance with Section 38 (6) of the Planning and Compensation Act 2004 permission should be granted for the installation.

We consider the development complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community while minimising visual impact.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

On the basis of a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the requirements of the National Planning Policy Framework and Council's Local Plan Policies.

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