

Proposed base station installation at:**Cell Ref:** CS120839 VF088510**Address:** Telecommunications site at Old Flag Tower, Alton Towers Leisure Park, Alton, Staffs., ST10 4BZ**NGR:** 406981, 343069**Design and Access Statement v1**

This Statement is provided in conjunction with all associated documentation submitted in relation to the subject application.

In accordance with the Code of Practice for Wireless Network Development in England (March 2022) 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
- An appreciation of context has been employed in the design

Site Conditions, Technical Constraints, Landscape Features and Capacity Requirements

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.

The host property, the Old Flag Tower at Alton Towers Leisure Park; a Grade II Listed Building (reference 1037867) situated within both the Grade I Alton Towers Registered Park and Gardens (reference 1000191) and within the Alton and Farley Conservation Area.

Pre-Application Discussions and Negotiations

There is a significant planning history attached to development proposal for telecommunications infrastructure at the host property with a number of consents and refusals having been issued to a number of operators. However, the applicant's current apparatus on-site has been deployed following the consenting of application references SMD/2015/0537 and 0538.

Pre-application consultation has preceded this submission with information submitted to the LPA via email on 21 April 2021. The submission included a written description of the preliminary proposal, a consultation plan and draft plans. No comments were received.

A wider consultation exercise which included Ward Councillors, the local Parish Council and Historic England has also been undertaken. In a response issued on 04 May 2021, Historic England have confirmed that they have concerns regarding

cumulative impact and have requested that any application be supported with full technical justification and both photographs and photomontages from surrounding vantage points.

It has, therefore, been considered appropriate to progress to a formal application stage without further delay and to address the abovementioned issues as part of the planning process.

Documentation Submitted with the subject Application

As per the cover letter, the following information has been submitted:

- Planning application forms and certificates
- Planning drawings
 - Ref. No's: 100B, 101A, 200B, 201B, 300A, 301A, 302A, 303A, 304B, 305B, 306B & 307B
- Site Specific Supplementary Information
- ICNIRP declaration & clarification statement
- Heritage Statement
- CIL Questions
- Additional supporting information
 - General Background Information for Telecommunications Development
 - Health and Mobile Phone Base Stations
 - Mobile UK Health Fact Sheet
 - Public Benefit of Mobile Connectivity
 - Radio Planning and Propagation

Design Component

The following information will address the various design considerations undertaken in the formulation of the subject proposal:

- Use proposed
The proposed development will provide up-to-date multi-generational (2G, 3G, 4G, 5G) telecommunications coverage for Vodafone in the Alton Towers Theme Park area; an attraction that places much capacity and coverage demands upon mobile communications networks. The proposed antennas will transmit the signal with the associated and ancillary equipment servicing these antennas.

Please note that 5G technologies operate in higher frequency bands than older technologies and therefore attenuation of the radio signal is naturally higher and more prone to the effects of clutter, i.e. natural and manmade features that can impede signal. Furthermore, unlike traditional technologies 5G uses adaptive beamforming technologies to increase capacity and data speeds to the user which often requires higher positions than preceding technologies.

- Amount
The proposal incorporates the following:
 - Removal of 3No. antennas and all ancillary development
 - Installation of 6No. antennas and all ancillary development

You will note from the submitted plans that the proposed ancillary development includes new standoff brackets allowing for the proposed antennas to be paired off and to be specifically tilted and orientated to ensure an effective service is provided. A 300mm wide cable tray and other minor elements will be installed on the main roof level with an upgrade of the existing apparatus within the internal equipment room also being proposed.

The proposed antennas and any ancillary apparatus to be deployed on the external facades of the host building will be painted to match those they replace.

All apparatus has been limited to a minimum amount and dimension for the achievement of an efficient and up-to-date telecommunications service to be achieved.

- **Layout**
The proposed apparatus will occupy a position similar to that which is being replaced. However, the proposed antennas will be greater in number and have therefore been paired off on new brackets. By doing so, the operators can achieve almost 360degree 2G, 3G, 4G and 5G coverage in the local area. It is not possible to supply such multigenerational coverage without using separate 5G antennas; hence the number increase.
- **Scale**
The host building measures to 29m to the top of the uppermost turrets. The existing antennas are located at a height of 25m to underside and will measure 2,000mm in length. The proposed antennas are located at a height of 24.9m and 26.44m to underside and will measure 2,100mm and 560mm in length, respectively. Please note that the 5G antennas are the smaller set of 3No. antennas. The brackets on which the proposed antennas are to be installed will measure 600mm wide. Due to the structural capability and spacing required for operational viability, the proposed antennas cannot be accommodated on the existing brackets. As indicated above, all apparatus has been limited to a minimum operational requirement in terms of amount and size.
- **Landscaping**
This proposal relates to the use of an existing building. As such, no landscaping is proposed not considered to be viable.
- **Appearance**
One must acknowledge that this site is now the primary telecommunications site in the area and is well-established as such. The design principles of the proposed apparatus will reflect that which is currently in place, as far as is operationally possible. Although a greater number of antennas will be deployed in visible locations, as indicated in 'scale' above, 3No. are much smaller and 3No. are very slightly larger than those they replace. The proposed apparatus will be painted to reflect those which are to be replaced, i.e. black/grey – RAL7021, so as to reflect the fabric of the host building and to minimise visual impact. In light of this, the colour of the antennas and the height at which they are to be located, additional impact, especially upon mid to longer range views, is not considered to be significant. All other rooftop and internal apparatus will be screened from view.

All works will be carried out with full respect for the historic fabric of the host building, using existing fixtures and fittings wherever possible.

The proposal before you has been devised with careful and sensitive consideration for the character and setting of this Grade II Listed Building and both the Registered Park and Gardens and Conservation Area within which it is sited.

Access

Access to the development is by definition limited to the operator and its authorised agents. Vehicular access to the site is taken via the existing access trackway with pedestrian access to the host building obtained via a doorway on the south east façade. Despite being a publicly accessible building, internal access and specifically the area containing the base station will be obtained via existing internal stairs, which is restricted to authorised personnel only.

Listed Building Consent Statement

This Design and Access Statement is submitted to support applications for both full planning and 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 Practice for Wireless Network Development in England (March 2022).

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.

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

Please refer to the associated Heritage Statement for further details.