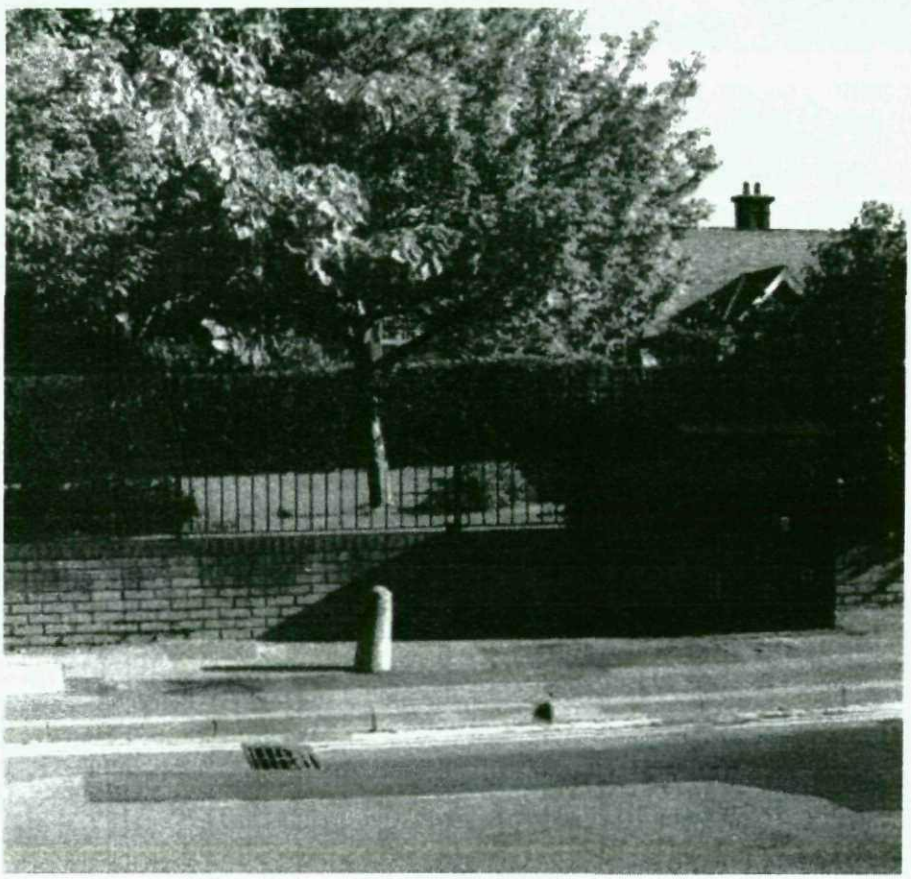
BT PLC Telecommunication DSLAM[1] Cabinet Installation

(Please note that this is not a mobile phone telecommunications installation)

SUPPORTING STATEMENT



(Picture above of the DSLAM Cabinet is for illustrative purposes only and does not depict the application site)

Date: 21/11/2012

Prepared by WHP (Wilkinson Helsby Projects Ltd)

Agents Ref: Project Beck – Conservation Area

[1] DSLAM is the abbreviation for 'Digital Subscriber Line Access Multiplexer'.

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1. Introduction

BT PLC is in the process of undertaking a project to replace copper and improve broadband speeds within the UK. The cabinets are required for next generation broadband access (NGA) and are 1130mm x 1408mm x 400mm. This infrastructure associated with this improvement will vastly improve the communication network for the residents and other stakeholders located within the authorities where this new technology is being "rolled out".

WHP Projects, an established Acquisition, Design and Construction services company facilitating the integration of wireless cell sites throughout the UK, has been tasked with undertaking the property and planning work with this project. A considerable number of New Generation Access cabinets are to be located within your authority and the vast majority of these have been authorised under Permitted Development rights. A number of these cabinets however, need to be placed within areas of the Authority that are in Article 1 (5) Land and thus require the consideration of the Planning Department. For this reason we have submitted the necessary Prior Approval applications and supporting information.

As stated above NGA stands for Next Generation Access and refers to the next step in the evolution of the first mile of the access network between the exchange and the end user's premises. NGA can take different forms. These can include enhancements to current copper access, and where distance limitations affect broadband service capability and availability, NGA could involve installing optical fibre in the access network either between the exchange and the street cabinet (Fibre to the Cabinet (FTTC)) or all the way from the exchange to the end user's premises (Fibre to the Premises (FTTP)). This project is FTTC. Transmission over fibre alone provides the same speed of broadband whatever the distance from the exchange. This means consistently fast and more powerful Internet connections are possible on fibre networks. Much faster uploads and downloads of data will be experienced – for example, it will be possible to upload pictures to the internet up to 10 times faster than on conventional broadband. As the number of fibred homes increases over the next few years, customers will be able to take advantage of innovative products. Customers can also expect very reliable service as fibre-optic cables are highly resilient and experience very low fault rates. FTTC will initially deliver speeds of up to 40Mb although advances in technology that can increase those speeds to more than 60Mb are imminent.

This Supporting Statement is provided in conjunction with the drawings, location plan of the cabinet and supporting material that has been submitted with this Prior Approval application.

This statement is submitted pursuant to Article 4C of the Town and Country Planning (General Development Procedure) Order 1995 (as amended)

2 The Proposal:

In accordance with 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 an area, the addition of this small DSLAM cabinet (1130mm x 1408mm x 400mm) painted green will have no affect on the Conservation Area and thus the key component of PPG15 / PPS5

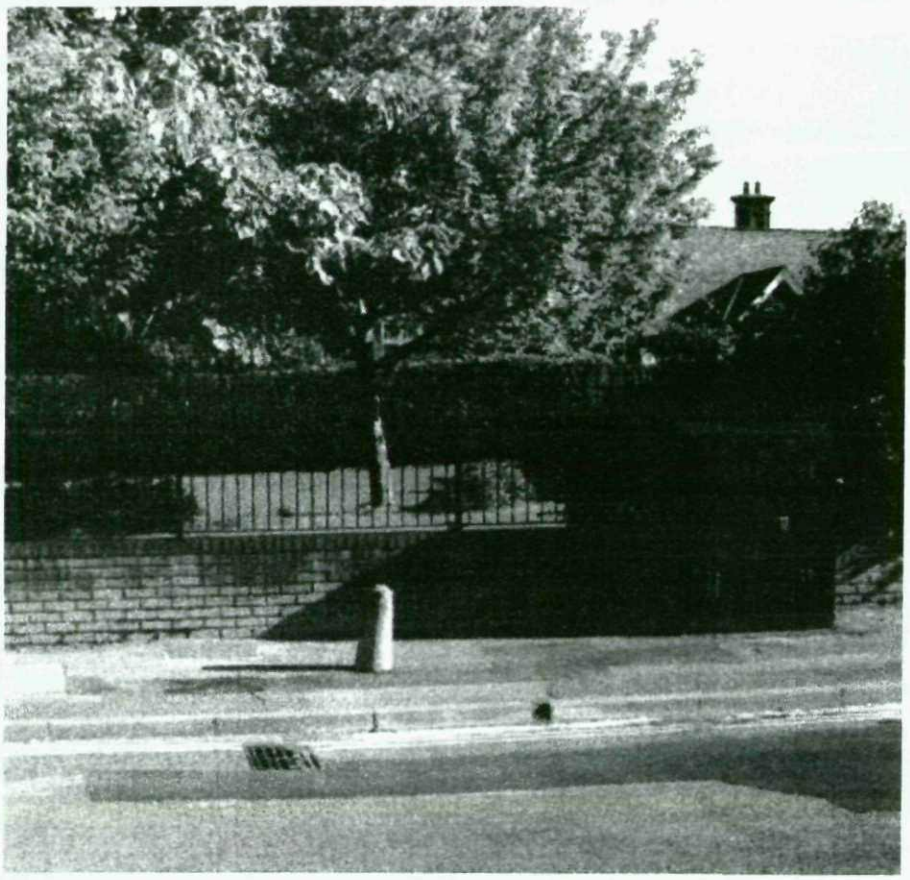
(enhancing or preserving the Conservation area) will be maintained. The Conservation area will be fully preserved by this vital piece of BT street furniture.

- 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;

The photo below fully illustrates how the cabinet looks and how it sits on the pavement of the highway. Please note that the photo below is not of the application site and is for illustrative purposes only.



It needs to be borne in mind that the proposed development is only for ONE minor street located telecommunications cabinet. The cabinet's dimensions are (1130mm x 1408mm x 400mm) and are proposed to be painted green. The colour can however, be tailored to the requirements of the Planning Department or Conservation Officer. This is not a mobile phone installation thus there is no associated monopole or antennas with this facility and no need for an ICNIRP Certificate. The proposed telecommunication cabinet is an essential piece of equipment for BT PLC to bring optimum broadband services to the Authority. Further details of the need are outlined in this report. The cabinet is street based and there are no access issues in that it is free standing on the pavement the cabinet has been located so that it does not affect pedestrians, wheel chair users or visibility lines for motorists pulling out of adjoining

roads. Access inside the cabinet is however, deliberately restricted for the security of the installation. Access to the development is by definition limited to the operator and its authorised agents.

3. The Application Site.

All the DSLAM Cabinets are located on the pavement of the adopted highway. WHP understand that this cabinet is located within the Conservation Area and thus a formal Prior Approval Application is required. The local pattern of streets and spaces, building traditions, materials and ecology all help to determine the character and identity of an area, the addition of this small DSLAM cabinet (1130mm x 1408mm x 400mm) painted green will have minimal affect on the Conservation Area and thus the key component of PPG15 / PPS5 (enhancing or preserving the Conservation area) will be maintained. The Conservation area will be fully preserved by this vital piece of BT PLC street furniture. Following a design survey by WHP's engineers, the specific location of the cabinets have been decided upon taking into account BT's requirements, the need to preserve the Conservation Area and avoiding any Highways Department site line issues.

4 The Need for the Proposal – Technical Justification

Telephone services have traditionally been supplied via a pair of copper wires from the telephone exchange to the subscriber's premises. Above a certain distance from the telephone exchange, the individual wires are replaced by a single high capacity copper multicore cable which terminates in a street mounted cabinet and from which run individual pairs of copper wires to customers' premises. Demand for high speed internet and data services, known as broadband, has caused this traditional technology to become obsolete for this purpose, because the longer the high capacity cable from the exchange, the slower is the broadband speed that can be transmitted.

The solution is to run a fibre optic cable in addition to the high capacity, copper multicore cable. This fibre optic cable cannot be accommodated in the existing cabinet and requires a new cabinet to be positioned nearby. The fibre optic cable will enter this new cabinet, within which a digital device known as a multiplexer will cause the incoming information to be sent to the intended subscriber. This will require the output from the new cabinet to be connected to the nearby existing cabinet, which contains the pairs of copper wires connecting to the customers' premises. The normal voice telephone services will continue to be provided by the traditional route from the telephone exchange.

5 Development Plan and National Planning Policy Framework

PPG8 and PPS1 have been replaced by the National Planning Policy Framework (NPPF) (March 2012). This document condenses the advice outlined previously although the broad principles of promoting the expansion of electronic communication networks remain the same:

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) 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.

Paragraph 19 states that "The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system".

It continues in Paragraph 20 to confirm Central Government advice that "To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century". The following paragraph states "Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure"

Section 4 of the NPPF (Paragraph 29) encourages the "smarter use of technologies" to reduce the need to travel and promote sustainable transport methods in accordance with the central sustainable development thread which travels through the Framework.

The most pertinent section of the NPPF to the proposed development is that contained within Section 5: Supporting High Quality Communications Infrastructure.

There is recognition from Central Government in Paragraph 42 that "Advanced, high quality communications infrastructure is essential for sustainable economic growth" which will in turn play a vital role in developing provisions within the local community of both facilities and services.

Paragraph 43 identifies the need to "keep the number of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network". In doing so, Central Government encourages the use of existing masts, buildings and other structures unless the need for a new site can be justified. Where such new sites are required, it is suggested that, where appropriate, equipment should be sympathetically designed and camouflaged.

Paragraph 45 defines the evidence that should be supplied to justify the proposed development. This should include:

- "The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college or within a statutory safeguarding zone surrounding an aerodrome or technical site; and
- for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission on non-ionising radiation protection guidelines; or
- for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a

statement that self-certifies that, when operational, International Commission guidelines will be met."

Confirmation that Local planning authorities must determine applications on planning grounds is also contained in Paragraph 46. In determining applications, it is the contention of Central Government that LPAs should not seek to prevent competition between different operators or question the need for the telecommunications system.

Central Government attaches great importance to the design of the built environment and outlines this within Section 7 (para. 56). It states "Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people".

In respect to good design, decision making should aim to ensure that any proposal deemed appropriate would "function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development" and "respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation".

In determining planning applications "great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area". Paragraph 63.

It is the intention of the NPPF that "Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits)". Paragraph 65.

Paragraph 66 clarifies that "Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably".

We consider the development is fully compliant with these policies for the following reasons:

We have provided detailed evidence as outlined in the technical justification section for the requirement of this DSLAM cabinet and how it will fit into the existing and proposed networks and the technical limitations.

We consider the siting scale and design of the proposed development will ensure there is no adverse impact the appearance or character of the locality and general street scene.

It is well established than one of the principle methods of minimising the impact of telecommunication development is by reducing the contrast that between the equipment and its surroundings. This is done in two ways by choosing sites where the equipment does not contrast with visual expectations of the location and choosing a design that minimise the contrast with the immediate visual setting. This proposal achieves this by its siting and the fact that the DSLAM cabinets dimensions have been kept to a minimum.

If the site of the DSLAM cabinet was not situated within a Conservation Area the equipment would not require Prior Approval as the cabinets would be deemed to be Permitted Development. However, because the site is located within a Conservation Area great care has been taken to locate these where there visual impact is negligible.

We consider that the development is complaint with the council's policy and that in accordance of Part 24 of Schedule 2 of the Town And Country Planning (General Permitted Development) Order 1995, as amended by the Town And Country Planning (General Permitted Development) (Amendment) (England) Order 2001 and in accordance with the electronic communications code under the Telecommunications Act 1984 Schedule 2 as amended by the Communications Act 2003 permission should be granted for the installation.

We consider this development is fully compliant with the above policy guidance. We have proposed an extremely unobtrusive DSLAM cabinet located within the existing townscape to minimise impact.

6 Conclusions

We consider the development complies with government guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community while minimising visual impact. We consider taking into account the factors of technical constraints, available sites and planning constraints that this site and design clearly represent the optimum environmental solution.

The addition of this minor DSLAM cabinet will fully preserve the Authority's important Conservation Area. This cabinet has to be located within the Conservation Area and thus any conceivable objection will be outweighed by the many benefits that telecommunications bring to the economy and community