

**OFFICIAL****WHP Telecoms Ltd, 1a Station Court, Station Road, Guiseley, Leeds LS20 8EY****SITE SPECIFIC SUPPLEMENTARY INFORMATION****1. Site Details**

Site Name:	Shamrock Street Streetworks	Site Address:	Shamrock Street, Garnethill, Glasgow, Scotland, G4 9JZ
NGR:	E: 258532 N: 666301		
Site Ref Number:	GLC14624	Site Type: Macro	Street Works Monopole – Macro

2. Pre-Application Check List**Site Selection**

Was an LPA mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why: After a phone call to the LPA it was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator?	Yes	
If no explain why: N/A		

Pre-application consultation with LPA

Written offer of pre-application consultation:	Yes	
Was there pre-application contact?		No
Date of pre-application contact:	N/A	
Name of contact:	The Director of Planning	
No comments had been received in respect to the proposals.		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Amber		
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.			
Summary of outcome/Main issues raised: No responses had been received at the time of submission.			

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School/College

Location of site in relation to school/college: There are no schools in close proximity to the site.
Outline of consultation carried out with school/college: N/A
Summary of outcome/Main issues raised: N/A

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?		Yes
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		Yes
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	6 th January 2022	

3. Proposed Development

The proposed site: This is a highly constrained cell search area. The proposed site is located at Shamrock Street, Garnethill, Glasgow, Scotland, G4 9JZ. There is now a requirement to upgrade the UK CK Hutchison Networks (UK) Ltd (Three) network to provide improved coverage and capacity, most notably in relation to 5G services. This proposal is for a 16.0m SW (Street Works) monopole located on the adopted highways at Shamrock Street. The exact details of this proposal are illustrated on the enclosed drawings (Proposed Phase 8 Monopole C/W wraparound Cabinet at base & associated ancillary works). As with all 5G cells this is an extremely constrained cell search area. Options are extremely limited and the only viable solution that minimises amenity issues has been put forward. 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
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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.

The site selection process has also been influenced by the numerous vertical elements of street furniture distributed around the vicinity of the site including street lighting columns. The height of the pole has been kept down to the absolute minimum capable of providing the required essential new 5G coverage. The site has been selected on a wide adopted area of the highway in a position that will not impede pedestrian flow or the safety of passing motorists. The cabinets are located at the base of the new pole and unless the site is located in Article 2 (3) land these are PD without Prior Approval and do not form part of the proposal from a planning consideration perspective.

This is 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. Figure 1-3 illustrates the site and the surrounding area.

The proposed equipment has been strategically located on a wide stretch of pavement at Shamrock Street. The site benefits from some screening provided by the surrounding trees and shrubs while existing tall street furniture including tall street and flood lights will enable the equipment to blend into the street scene. The surrounding Heritage assets have been considered and the Central Area Conservation area has been avoided.

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Figure 1:

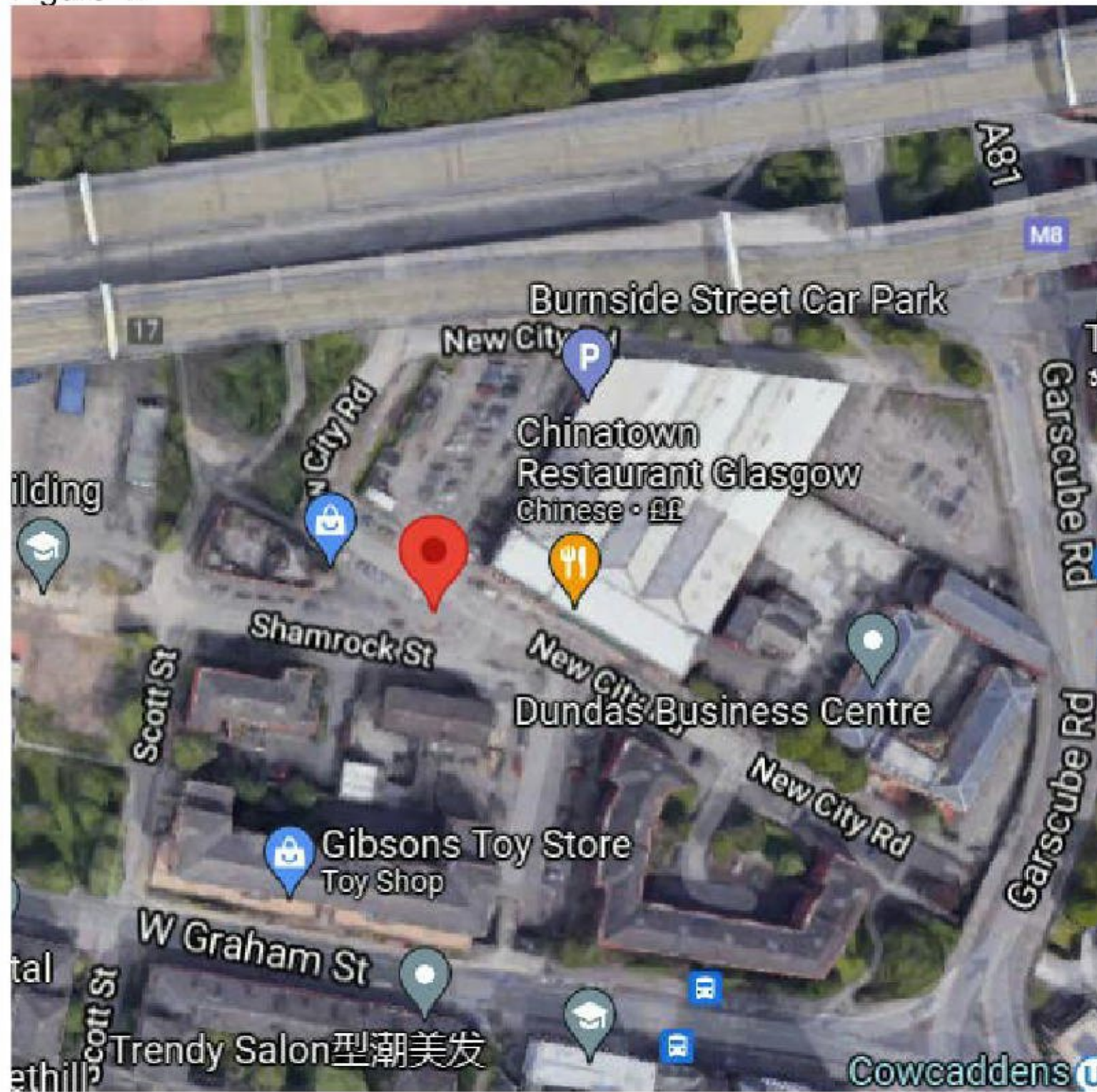


Figure 2:

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Figure 3:



Local Planning Authority: Glasgow City Council

Development Plan: Glasgow City Development Plan (2017)

The site is designated as being within the settlement boundary, with urban uses to the north, east, south and west. The site designation is not a material consideration.

Glasgow City Council Supplementary Guidance (Interim) IPG3 Economic Development contains policy on telecoms. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with PAN62.

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Policy Analysis:

Section 8 Telecommunications states:-

The Council will support proposals for new telecommunications infrastructure, where:

- i. they accord with Placemaking and Sustainable Spatial Strategy policy aims and objectives;
- ii. high-speed broadband is provided, especially where this is delivered via discrete underground cabling;
- iii. the site proposed has been identified and justified as the most appropriate solution following a search for alternative locations and options, including sharing or co-location of sites. Reasons for rejecting sites should be submitted as evidence;
- iv. visual impact is minimised through careful and sensitive design and siting;
- v. it is demonstrated that cumulative impact has been considered and limited;
- vi. careful landscaping or screening can be incorporated into the proposal, where appropriate.

This proposed development at the proposed site seeks to consolidate all existing elements into one location on site, minimised to ensure the scale and mass of the design is sympathetic to its surrounds, limiting visual impact on the wider character of the area and retaining the existing distance from sensitive receptors, yet retaining structural capacity to ensure that it would deliver the level of service needed in this location. As such it is considered the proposed development would accord with the principles of the Development Plan policy. The proposal fully accords with the requirements of PAN62.

The NPF3 was adopted 23rd June 2014. It identifies a vision for Scotland to create a sustainable, low carbon, connected, natural resilient and successful place (Paragraph 1.2).

The Government's latest thinking strongly supports digital infrastructure and the need to ensure that cities are better connected, providing a gateway to the rest of the world. Paragraph 5.16 identifies that cities are expected to become 'smarter' in the future and will use shared infrastructure and population density to further increase access to high performing digital services. Through strengthening digital infrastructure, the aspirations for more sustainable cities and subsequently attracting new business will be supported. Furthermore, NPF3 highlights the significance of improving digital infrastructure to support sustainable economic growth and ensure people and communities are better connected (Paragraph 5.25).

Pavement Width:

The CK Hutchison Networks (UK) Ltd Street Works (SW) Project is installing equipment solely on either adopted pavements or verges. In these adopted locations the Mobile Phone Industry have rights to place their equipment. With all SW proposals sufficient pavement width has been given for pedestrian, wheelchair, and pushchair access. Planning Appeal Reference: APP/A5840/W/20/3254830 makes specific reference to this element where the Planning Inspector states:

"Along with the mast the proposal includes the installation of three cabinets. The mast would be located on the corner where the pavement is at its widest and free of street furniture. The cabinets would be positioned against railings just before the junction. It would reduce the width of the pavement. However, in my view even the narrower width of pavement available would

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still allow users to pass one another including those pushing a baby buggy or groups of people walking along the pavement. As such, the proposed development would not introduce excessive clutter on the pavement and would not present an obstruction to pedestrian movement or adversely affect pedestrian safety."

Enclosed map showing the cell centre and adjoining cells:

There is an extremely small, constrained search area for this cell. See below the cell search area and the existing sites in the immediate vicinity. Often the proposal has been pulled marginally outside of the cell search area due to residential amenity, pavement width, underground services and planning issues. The mast must be be in a position where it can be physically constructed. Existing underground services continue to be a significant obstacle to the deployment of this roll out. The optimum solution from a planning and radio coverage perspective has been put forward.

Figure 4 illustrates the nominal and existing 3 UK sites in the area. The nominal is captured by the pink dot below. The equipment has to be located in this marker or very close to it to give coverage and not to interfere with the adjoining CK Hutchison Networks (UK) Ltd sites.

Figure 4:



Type of Structure

Description:

Proposed Phase 8 Monopole C/W wraparound Cabinet at base

Overall Height: +16.0m AGL

Height of existing building

N/A

Equipment Housing:

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Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Tower/mast etc – type of material and external colour:	Proposed Phase 8 Monopole C/W wrapround Cabinet at base - Galvanised
Equipment housing – type of material and external colour:	Material: Steel, Colour: Grey

Reasons for choice of design:
<p>The proposed installation is an CK Hutchison Networks (UK) Ltd (Three) Phase 8 Monopole which will house CK Hutchison Networks (UK) Ltd (Three). The proposal is required due to acute capacity issues and will facilitate significantly improved 5G in areas that have started to gain this service and newly introduce it to the areas that have not gained this level of connectivity yet.</p> <p>In keeping with the National Planning Policy Framework (NPPF July 2018). guidelines of using high quality communications infrastructure the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing street furniture, having similar vertical lines and overall appearance to the numerous street lighting columns in this area.</p> <p>The 5G antennas are some 3 times as heavy as previous antennas, while the associated Remote Radio Units also now need to be placed at the top of the pole, thus many street works designs are no longer structurally capable of hosting all the equipment of 2 operators. It should be noted that the alternative option that could accommodate both operators (EE and H3G LTE who have a site sharing agreement) would be a more traditional 'greenfield' mast, with an open headframe and more bulky design, which would be inappropriate in a street scene location. There is no such location in this cell search area where a greenfield mast could be housed and thus site sharing is not a viable proposition.</p>

4. Technical Information

ICNIRP Declaration attached	Yes	
<p>ICNIRP public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance the emissions from all mobile phone network operators on the site are taken into account.</p>		

5. Technical Justification

Reason(s) why site required
<p>The National Planning Policy Framework clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.</p>

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The site is required to provide new 5G coverage for CK Hutchison Networks (UK) Ltd in order to improve coverage in the Garnethill area of Glasgow. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 250m meaning that it would not be feasible to site the column outside of this locale.

6. Site Selection Process – alternative sites considered and not chosen

Discounted Options

In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF) following search criteria have been utilised. Firstly, consideration is always given to sharing any existing telecommunication structures in the area, secondly consideration is then given to utilising any suitable existing structures or buildings and thirdly sites for freestanding ground-based installations are investigated.

This sequential approach is outlined below:

- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPPF all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Ofcom Site Finder mast register is always examined prior to the submission of an application.

DISCOUNTED OPTIONS:

If no alternative site options have been investigated, please explain why:

The cell search area is illustrated below and is extremely constrained. The only viable option has been put forward. As with all 5G cells this is an extremely constrained cell search area. Options are extremely limited and the only viable solution that minimises amenity issues has been put forward.

Figure 5:

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Discounted Options:

Nominal/D1 – Location within a busy junction.

D2 – Discounted due to proximity to residential properties and Conservation area.

D3 – Discounted due to proximity to residential properties and Conservation area.

D4 – Discounted due to proximity to residential properties and from a build perspective.

D5 - Discounted from a build perspective.

D6 – Discounted from a build perspective.

D7 – Discounted from a build perspective.

D8 – Discounted from a build perspective due to underground services.

7. Additional Relevant Information

Background to the Proposal

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

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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 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.

Scottish Planning Policy and the NPF superseded NPPG 19. This document condenses the advice outlined previously although the broad principles of promoting the expansion of electronic communication networks remain the same:

The NPF3 was adopted 23 June 2014. It identifies a vision for Scotland to create a sustainable, low carbon, connected, natural resilient and successful place (Paragraph 1.2).

The Government's latest thinking strongly supports digital infrastructure and the need to ensure that cities are better connected, providing a gateway to the rest of the world. Paragraph 5.16 identifies that cities are expected to become 'smarter' in the future and will use shared infrastructure and population density to further increase access to high performing digital services. Through strengthening digital infrastructure, the aspirations for more sustainable cities and subsequently attracting new business will be supported. Furthermore, NPF3 highlights the significance of improving digital infrastructure to support sustainable economic growth and ensure people and communities are better connected (Paragraph 5.25).

The following paragraphs are of significance:

Para 5.8 – "Connectivity is not just about enabling physical movement, but also virtual links. High quality mobile and fixed broadband connections have become essential to support communities and business development in both rural and urban areas. At present, there remains a significant gap between our most and least connected areas, with digital access being considerably better in more accessible urban areas. Many parts of rural Scotland have little or no connection and require public investment to rebalance the distribution of infrastructure."

Para 5.9 – "Our Infrastructure Investment Plan aims to accelerate the roll out of next generation broadband to all parts of rural Scotland over the next five years, to support public service provision as well as investment in the digital economy and rural economic growth. Work is progressing to develop new fibre links connecting rural areas, with an expectation of fibre links

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to 95% of premises Scotland wide by 2017/18. Opportunities for smarter towns and cities are also being explored."

Para 5.15 – "To further reduce the need to travel and ensure continuing economic competitiveness, we will see a step change in digital connectivity in the coming years, supporting our broader aspirations for growth across the country. This will require significant investment in digital infrastructure to ensure coverage extends to our most remote, but asset-rich, rural and island communities. As well as providing new infrastructure to connect existing areas, future developments will build in digital connectivity as a matter of course. We are extending permitted development rights to facilitate this."

Para 5.16 – "Strengthened digital infrastructure will support our aspirations for more sustainable cities which attract new business. We can expect cities to become significantly 'smarter' in the next few years, using population density and shared infrastructure to further increase access to high performing digital services."

Para 5.29 – "Our plans for investment in digital infrastructure will play a key role in improving competitiveness, ensuring that there is no digital divide between rural and urban Scotland. Our 'Digital Scotland Superfast Broadband Programme' is delivering £410 million of public and private investment in parts of Scotland, including rural, semi-rural and suburban areas, that would not otherwise be served commercially. We are also exploring delivery models to extend mobile services to some of our hardest to reach areas."

Para 5.35 – "Improved digital infrastructure, both fixed and mobile, is essential to support sustainable economic growth and better connect people and communities. We have identified a digital fibre network linking our most peripheral communities as a national development. This will bring particular benefits in the north and west coasts and islands, given their relatively dispersed population and the potential to support population and economic growth through increased home and remote working."

Scottish Planning Policy 2014 (SPP)

Scottish Planning Policy published 23rd June 2014, is a statement of Scottish Government policy on how nationally important land use planning matters should be addressed across the country. SPP is supplemented by a series of Planning Advice Notes (PANs).

Paragraphs 292 – 300 of the SPP relate specifically to Supporting Digital Connectivity, including telecommunications developments. It highlights the importance of our digital infrastructure, across the whole of Scotland, including urban and rural areas and confirms that Scotland's economy and social networks depend heavily on high-quality digital infrastructure. To facilitate investment across Scotland, planning has an important role to play in strengthening digital communications capacity and coverage across Scotland.

The proposed development accords with all these aspects of the NPF3 and SPP in that it will provide EE and the 3ES with new and improved network provision within the IV27 area of the Highlands bringing a range of associated economic and technical benefits.

Paragraph 295 of the SPP confirms that *Local development plans should provide a consistent basis for decision-making by setting out the criteria which will be applied when determining planning applications for communications equipment. They should ensure that the following options are considered when selecting sites and designing base stations:* -

- *mast or site sharing;*

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- *installation on buildings or other existing structures;*
- *installing the smallest suitable equipment, commensurate with technological requirements;*
- *concealing or disguising masts, antennas, equipment housing and cable runs using design and camouflage techniques where appropriate; and*
- *installation of ground-based masts.*

In accordance with paragraph 295 the applicant has demonstrated that there are no suitable, available or deliverable existing sites and this proposed new installation is justified.

Policy 296 confirms that "Local development plans should set out the matters to be addressed in planning applications for specific developments, including: -

- an explanation of how the proposed equipment fits into the wider network;
- a description of the siting options (primarily for new sites) and design options which satisfy operational requirements, alternatives considered, and the reasons for the chosen solution;
- details of the design, including height, materials and all components of the proposal;
- details of any proposed landscaping and screen planting, where appropriate;
- an assessment of the cumulative effects of the proposed development in combination with existing equipment in the area;
- a declaration that the equipment and installation is designed to be in full compliance with the appropriate ICNIRP guidelines for public exposure to radiofrequency radiation (*The radiofrequency public exposure guidelines of the International Commission on Non-Ionising Radiation Protection, as expressed in EU Council recommendation 1999/519/ EC on the limitation of exposure of the general public to electromagnetic fields.*); and
- an assessment of visual impact, if relevant".

It is considered that the applicant has addressed all matters set out in the 'model' telecommunications policy.

In assessing applications for developments, paragraph 298 of SNP confirms that "*Consideration should be given to how proposals for infrastructure to deliver new services or infrastructure to improve existing services will contribute to fulfilling the objectives for digital connectivity set out in the Scottish Government's World Class 2020 document. For developments that will deliver entirely new connectivity – for example, mobile connectivity in a "not spot" – consideration should be given to the benefits of this connectivity for communities and the local economy.*"

Paragraph 299 of SPP states: "*All components of equipment should be considered together and designed and positioned as sensitively as possible, though technical requirements and constraints may limit the possibilities. Developments should not physically obstruct aerodrome operations, technical sites or existing transmitter/receiver facilities. The cumulative visual effects of equipment should be taken into account.*"

Paragraph 300 of SPP states "Planning authorities should not question the need for the service to be provided nor seek to prevent competition between operators. The planning system should not be used to secure objectives that are more properly achieved under other legislation. Emissions of radiofrequency radiation are controlled and regulated under other legislation and it is therefore not necessary for planning authorities to treat radiofrequency radiation as a material consideration".

Planning Advice Note: PAN 62 Radio Telecommunications

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Pan 62 refers to Radio Telecommunications and states that the NPPG considers the general siting and design principles for telecommunications. It states that such development should be undertaken in a manner that minimises environmental impact and should have a sensitive design in both urban and rural areas.

Paragraph 32 identifies two components associated with minimising the contrast between telecommunication equipment and its surroundings: *minimising contrast between equipment and people's expectations of a particular scene and minimising the contrast between equipment and its immediate setting or background*. For example, a lattice mast generally fits expectations about industrial landscapes and fitting antennas to an electricity pylon or painting antennas to match the façade of a building can reduce contrast.

Paragraph 33 identifies ways in which to minimise this contrast, these are as follows: -

- *select a shape and material appropriate to the character of the area;*
- *keep the shape simple with clean lines, and fit all the elements, such as antennas, cables and ladders within the visual envelope of the basic shape;*
- *develop a composition where the properties seem in proportion and balanced, for example masts that taper to the top are usually more acceptable;*
- *minimise the number of separate visual elements in a base station; and*
- *use regularity, order and symmetry in positioning equipment*

Furthermore, paragraph 34 identifies a series of options that should be considered as a guide for selecting the site and design of telecommunications that minimise contrast operators. The implementation of telecommunications is site-specific and therefore should be considered against the site conditions and coverage and capacity requirements in addition to technical constraints and landscape character. The options are: -

- *installing small scale equipment;*
- *concealing or disguising equipment;*
- *mast sharing;*
- *site sharing;*
- *installing on existing buildings or other structures; and*
- *erecting a new ground-based mast.*

Fixing the Foundations: Creating a more prosperous nation (July 2015)

This document known as the 'Productivity Plan' sets out a 15-point plan that the government will put into action to boost the UK's productivity growth, centered around two key pillars: encouraging long-term investment, and promoting a dynamic economy. It sets out the government's long-term strategy for tackling the issues that matter most for productivity growth.

Chapter 7 of the Productivity Plan refers to 'World-class digital infrastructure in every part of the UK'.

The Plan states a '*Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home. Investment in high-speed broadband will support long-term economic growth, with GVA increasing by £6.3 billion, causing a net increase of 20,000 jobs in the UK by 2024.*¹ Geographic coverage and take-up of superfast broadband in the UK is already the highest of the 5 largest EU economies.² The government's superfast broadband

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programme is passing an additional 40,000 premises every week – superfast speeds of at least 24Mbps will be available to 95% of UK households by 2017’.

By reducing regulatory red tape and barriers to investment, the government has committed to support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK’s businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published in March, of near-universal 4G and ultrafast broadband coverage.

Conclusion

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 Framework and Local Plan Policies.

Eve Wyke BSc (Hons)
Planning Manager

Contact Details

Name: (Agent)	Eve Wyke BSc (Hons)	Telephone:	N/A
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Operator:	CK Hutchison Networks (UK) Ltd	Fax no:	N/A
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Address:	WHP	Email Address:	
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Signed:

Date:

7th January 2022

Position:

Planning Manager

Company:

WHP

(on behalf of above
operator)

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