

Town Planning Statement

Replacement Mast at Existing Electronic Communications Base Station

**J & L Supplies
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COL.MOD.UK.0003509

CELLNEX UK AND MBNL

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1. INTRODUCTION

1.1 This Planning Statement is submitted in support of an application for prior approval for an replacement of an existing mast serving as a mobile base station for the mobile network operator(s) (MNOs) EE Ltd and Hutchison 3G UK Ltd, in conjunction with Mobile Broadband Network Limited (MBNL). The application site is owned / operated by Cellnex UK, a radio site infrastructure provider.

1.2 The application includes:

- A description of the site and surrounding area
- A description of the proposal
- A statement of community engagement
- A review of planning policy considerations
- A review of design and access considerations

1.3 A number of other accompanying documents have been submitted in support of the application and these are referred to and should be read in conjunction with this statement.

Context

1.4 This application for prior approval is made following a previous refusal of prior approval by Knowsley Council in December 2025 under LPA Ref: 25/00589/TEL for the replacement of the existing mast. The current submission seeks to positively respond to the reason for refusal given together with the content of the accompanying Planning Officer's Report whilst proposing a scheme which is still capable of providing enhanced high-quality digital connectivity to the surrounding area through the provision of 5G.

1.5 In summary, a far slimmer monopole design has been adopted that significantly reduces the bulk of the proposed mast at the upper level of the mast which are noted to be generally visible within the surrounding streetscene, itself formed of an industrial context comprised of warehouse development. The proposal does not change the height of the previously refused scheme, this is unchanged at 20m. This is because there is a specific operational purpose that the mast must fulfil which cannot be achieved at a height of below 20m.

- 1.6 The applicant also brings to the attention of the LPA that there is a different policy context for determining the current application versus the previously refused scheme, the August publication of the NPPF. NPPF26 provides stronger policy support for high-quality digital connectivity where the weighting of the benefits delivered by the proposed development now attract substantial positive weighting in the planning balance. Substantial weight is the top level of positive weighting that can be attributed to development proposals within the planning balance. NPPF26 says that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects.

2. THE SITE AND SURROUNDING AREA

- 2.1 The application site is currently occupied by a 15m mast of monopole design, situated to the rear of an industrial warehouse unit occupied by J & L Supplies. Antennas are fixed to the top of the mast, extending the total height of the existing installation to 16.5m. The mast is situated within a compound area, delineated by a 2.1m palisade fence.
- 2.2 The surrounding context is heavily characterised by large warehouse units of a variety of sizes and configurations, typically 8-10m in height and of utilitarian appearance. The site is bounded to the north by School Lane which itself is lined with mature trees along the northern boundary of the road within the vicinity of the application site. Existing trees are approximately 10-12m in height.
- 2.3 There are no residential properties within 200m of the site, nor are there any open areas of amenity. School Lane itself features a pavement abutting the northern carriageway only. There are no benches or places people might stop and spend any significant time within the vicinity of the application site. The speed limit along School Lane is 40m.p.h. within the vicinity of the application site.
- 2.4 No ecology, landscape or heritage constraints affect the site.
- 2.5 Knowsley Council's Online Planning Register indicates the following planning history for the site:
- Prior approval refused in December 2025 for the removal of existing 15m mast to be replaced with a 20m lattice structure (LPA Ref: 25/00589/TEL). The applicant has made reference to the content of the Planning Officer's Report and decision notice in progressing the current application.
 - Planning refused in February 2001 for the redevelopment of the existing 15m mast with a 20m telecommunications mast. together with equipment cabin and ancillary development (LPA Ref: 00/00750/FUL). The Planning Officer's report was unavailable to view online.
 - Prior approval granted in December 1998 for the installation of a 15m high slimline telecommunications mast, 3 no. antennae and 2 no. microwave dishes, together with associated equipment cabin and 2m high palisade fencing (LPA Ref: 98/00666/TEL). The Officer's Report was unavailable for viewing online.

3. THE PROPOSAL

- 3.1 The development proposed is shown in detail in the drawings submitted and is for a new electronic communications base station. The applicant is seeking prior approval for a different design than has previously been considered by the Council. A 20m replacement monopole design is proposed which significantly reduces the bulk of the headframe when compared to the previously refused scheme.
- 3.2 The purpose of the mast is to provide enhanced 3G and 4G digital connectivity whilst providing new 5G service to the area. This will be achieved through the upgrade to an existing site rather than proposing a new greenfield site elsewhere in the surrounds. As such, it is precisely the sort of development supported by NPPF26 Policy CO-1.
- 3.3 The description of the proposed works is as follows:
- “Existing 15m monopole to be replaced with a 20m monopole tower and ancillary development thereto.”*
- 3.4 Ancillary development thereto includes the installation of various minor items of equipment designed to maximise the efficiency of the site. These include Remote Radio Units (RRUs), ERS units and associated cabling. No new equipment cabinets are proposed. The existing radio equipment cabinet on site will be subject to internal alternations in order to accommodate the equipment proposed. All proposed development will take place within the existing compound area, no extension to this compound area is required to facilitate development.
- 3.5 The mast and headframe are constructed of galvanised steel. This will appear grey, fading to a dull grey as the mast weathers over time. The antennas themselves are finished with a dense plastic outer shell which also appears as a dull grey colour. This colour scheme will allow the mast to best assimilate with the sky backdrop which is often itself, grey.
- 3.6 The mast proposed is 20m in height. There is a specific operational requirement for antennas to be positioned at this height whereby radio signal propagation must have line of sight over the intended target area in order to provide signal. A lower mast would not provide this line of sight because signal propagation would be hampered and impeded by existing buildings and foliage in the surrounds thereby reducing the efficiency of the mast and limiting its operational value.

- 3.7 The width of the proposed headframe is 1.9m. The width of the previously refused headframe was 4.1m.
- 3.8 The installation forms part of a wider network of telecommunication base stations that serve the Knowsley area. The network of sites are designed to function together to provide comprehensive coverage over the wider area. In practice this means that mobile handsets can be used for the purposes for which they are designed without drop off in service provision or network coverage.
- 3.9 The application site has been selected by the operator as this will provide the required level of network coverage while properly meeting national town planning policy objectives for the shared use of existing electronic communications masts and sites, in this case owned / operated by Cellnex UK.

4. PRIOR ENGAGEMENT

- 4.1 The recently revised National Planning Policy Framework (NPPF) and the Code of Practice for Wireless Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received amber when assessed against the traffic light rating model as referenced in the Code of Practice.
- 4.2 Prior to the submission of this application, the applicant wrote to the Local Planning Authority setting out the particulars of the scheme and inviting comment. In our engagement letter we sought to agree with you the appropriate traffic light rating and associated engagement requirements with the local community and obtain your comments on the siting and design of the development.
- 4.3 Regrettably we have not received any response from your authority and accordingly we would be pleased to address any necessary matters within the determination period of the application.
- 4.4 Our best practice engagement with the local community entailed pre-consultation letters being sent to local ward councillors Frances Wynn, Ian Smith, Mark Burke. At the time of submission, no responses were received.

5. PLANNING POLICY

5.1 The relevant planning policy and best practice framework is found principally within:

- National Policy, especially the National Planning Policy Framework (NPPF)
- The local policy framework set out in the adopted Development Plan;
- The Code of Practice for Wireless Network Development in England.

5.2 From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development. As planning authority, you will be familiar with this framework and so in the interests of brevity, we do not rehearse it back to you in detail, but address instead the principal themes to demonstrate that the application accords with them.

National Support for Modern Communications

5.3 NPPF26 provides enhanced support for high-quality communications when compared with previous versions of the NPPF. The objective of the NPPF remains to support the expansion and upgrading of telecommunications infrastructure in ways which limit an unnecessary proliferation of equipment whilst respecting important environmental safeguards. Advanced, high quality and reliable communications are reaffirmed as essential to meeting changing technological, social, business and security requirements.

5.4 Unlike previous iterations of the NPPF, the new NPPF provides directional weighting to the decision maker in terms of the positive benefits of high-quality communications. Now, substantial weight should be given to the benefits of maintaining or improving network coverage where substantial weighting is the highest category of weighting to be applied within the planning balance.

5.5 Furthermore, NPPF26 Policy CO1 encourages proposals to replace existing infrastructure where possible which is the case with the current development proposal.

Balancing operational and environmental considerations

- 5.6 The applicant acknowledges that the special operational and technical factors that require specific siting of a base station should be balanced by the need to minimise environmental and visual impact.
- 5.7 However, there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs, the NPPF now applies a reduced policy test compared to previous guidance. This helps to clarify that an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.
- 5.8 In balancing these requirements, the starting point for the networks or the expansion of existing networks is to use existing electronic communications sites owned by other operators or radio site management companies such as Cellnex UK. This policy objective is backed with the statutory obligation placed upon operators to share apparatus, where practicable out under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.
- 5.9 Although a replacement mast is required in this instance, this will be at an existing site owned or managed by Cellnex UK, where there are existing operations which is suitable for electronic communications use by virtue of the existing structure. A replacement mast is required in this instance, as the existing mast is already developed to full capacity due to the amount of existing equipment already installed (amend accordingly). The development entails the use of an existing site owned or managed by Cellnex UK which is in operational use and where a mast is already an established feature of the site and wider landscape. Within this context the replacement mast will be seen as an acceptable and justified use, reflecting all of the considerations under Policy CO1 of the NPPF:
- The base station is required as part of a national mobile communications network, necessary to extend and improve mobile connectivity to the local area;
 - The target coverage area has been explained and consequently the special operational and technical requirements necessitate siting of a mast within it;

- All reasonable steps have been taken, through careful siting at an existing Cellnex UK communications site, to moderate the visual impact of the development, having regard to technical and operational factors. In this case, the replacement of an existing mast now an established and accepted feature within the landscape;
- The proposal to share this existing communication site, through the installation of a replacement looks to strike the optimum solution, particularly when compared with the alternative of erecting a new base station elsewhere and the development of an associated compound on a site nearby and with it the associated additional resources in developing a new site

5.8 The replacement mast requires prior approval, as the operational needs and associated design of the mast means that it falls outside the relevant width and height limitations of outright permitted development pursuant to the Town and Country Planning (General Permitted Development) (England) Order 2015 (the 'GPDO'). However, the relaxation of permitted development rights within the Amendment Order clearly reflects the Government's strong emphasis towards the reuse and redevelopment of existing electronic communications installations to minimise the need for further structures elsewhere and this proposal clearly follows the emphasis within that particular guidance. The availability of permitted development rights to replace the existing structure must be a material consideration in the determination of the application (and as a 'fall-back' consideration).

5.9 As a matter of principle, the development proposed is in accordance with the relevant policy framework and should be therefore be acceptable. In the next section, the Design Considerations are reviewed to demonstrate that the detail of the development is also acceptable and that in accordance with the presumption in favour, planning permission should be granted.

Local Policy Considerations

5.10 At local level, the proposal has been considered against the Knowsley Local Plan Core Strategy (Adopted January 2016). Key policies together with a summary are provided below. It is not the purpose of this Planning Statement to repeat planning policy that the LPA will already be familiar with:

- Policy CS2 – requires that new development in Knowsley will be expected to support the design principle of promoting good quality design, and ensuring that development respects its setting taking in account relevant design requirements and best practice.
- Policy CS19 – states that to enhance local distinctiveness, identity and accessibility of places, new development will be expected to maintain a good standard of amenity for all existing and future occupants of land and buildings
- Saved Policy ENV8 in the Replacement Unitary Development Plan states that proposals for new telecommunications masts and associated antennae and buildings will not be permitted unless the applicant has demonstrated the need for the development and that the development would not, by reason of its scale, siting or design, have an unacceptable impact on the character or appearance of the surrounding area.

6. DESIGN CONSIDERATIONS

6.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. However, to assist your consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations. Due regard has been given to the factors addressed from Paragraph 20 of the Code of Practice.

Amount, Design, Layout and Scale of the Development

6.3 The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide coverage to the local area, having regard to the need to minimise visual impact, already referred to above.

Mast design/or mode of building install

- The design of the proposed mast is led by operational and technical factors of upgraded coverage, although the choice of mast design does reflect insofar as practicable observations made during the December 2025 refused application. Now, a monopole structure is proposed with a significantly narrower headframe.
- The mast required cannot be hidden, but any impacts on the landscape and visual amenity will be limited and moderated by confining height to what is required for operational reasons. Compared to other forms of vertical infrastructure also found in the landscape, the mast proposed is a benign structure: it is much lower than the television broadcast masts owned and operated by Arqiva; it is lower and does not form a sting of structures that march across the countryside like pylons; and it does not move like wind turbines, which are typically higher and are usually developed in clusters.
- Alternative designs like shareable tree masts have been considered ,but they cannot accommodate the amount of apparatus necessary to support upgraded coverage. Even if a tree mast could be designed to support such apparatus, it would still amount to an engineering solution unlikely to replicate the natural

features and character of a tree and would appear as a prominent and incongruous feature in the wider landscape.

Antenna Array

- The numbers of antennas and dishes and their size has been kept to the minimum necessary to provide coverage and to link this site back into the operator's network. The design of these features is very much driven by operational and technical factors.

Equipment Cabinets

- The number of radio equipment cabinets and their size has been limited to what is required to meet the operator's current and foreseeable network requirements. The location and design of the equipment cabinets, and the electronic communications equipment housed within them, reflects their functionality and the technical and operational requirement to be in reasonable proximity to the antenna systems and dishes that they support. This avoids exceptionally large runs of feeder cables and associated supporting trays, and the subsequent loss of signals.

Access Considerations

- 6.4 Access to the site will be provided from the existing access point off School Lane.
- 6.5 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.
- 6.6 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Landscaping

- 6.7 The proposed siting of the development has been very carefully chosen to minimise environmental impact. Any potential impact of the development is principally associated with radio mast, which is the most visible component of the base station, and which cannot be fully screened for operational reasons. The height of the mast means that any attempt to screen it in its entirety would be unrealistic in any event.

Appearance

- 6.9 The sensitive approach to siting and design should minimise the appearance of the development proposed. In addition, as indicated above the local topography and natural features should help minimise views. Insofar as the mast and compound may be visible they should look straight forward in appearance and reflect their function. To that extent they should in time become accepted features of the local environment as with other forms of communications networks and essentially public utility infrastructure, such as roads and railways.

7. HEALTH AND SAFETY

- 7.1 In support of the application, a certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.
- 7.2 The ICNIRP guidelines seek to protect against the well-known thermal effects of radio emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.
- 7.3 National planning policy remains clear, provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines through the refusal of planning permission.

8. SUMMARY AND CONCLUSIONS

- 8.1. In summary, the application is in respect of electronic communications base station necessary to improve a vital network that provides public services. The proposal will provide new 5G coverage to the surrounds and is the upgrade of the digital communications network that should attract substantial positive weight in the planning balance exercise as directed by NPPF26.
- 8.2. The service provided by the operator is in the public interest and is in very high demand, In the UK there are now more than 92.5 million subscriptions to mobile networks and mobile services now exceed fixed landlines in terms of customer numbers and usage.
- 8.3. The public interest of the system is clear from the considerable benefits that will flow and it makes a significant and major contribution towards sustainable objectives.
- 8.4. The operator's requirement is in the context of network needs associated with a upgraded cellular system. These impose particular locational and siting requirements which are even greater with upgraded coverage. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.
- 8.5. The operator has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:
 - Network planning based upon existing sites, including those controlled by Radio Site Management companies like Cellnex UK.
 - Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
 - Engagement in accordance with the Code of Practice procedures.
 - An examination of design options to try and minimise potential visual impact.
 - The replacement of an existing radio mast, compared with the alternative of erecting a new mast and the development of an associated compound on a site nearby and with it the associated additional resources in developing a new site.

- 8.6. The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.
- 8.7. This statement and the other accompanying material has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in particular within the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.
- 8.8. In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one which the presumption in favour of granting approval applies.