

Town Planning Statement
Electronic Communications Base Station

At the Existing Cellnex UK Site

J & L Supplies
11A Caddick Road
South Knowsley
Merseyside
L34 9HP

COL.MOD.UK.0003509

CELLNEX UK AND MBNL

October 2025

1. INTRODUCTION

- 1.1 This statement is submitted in support of an application for prior approval for an upgraded 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.

2. THE SITE AND SURROUNDING AREA

- 2.1 The existing 15m mast installation at the site of J & L Supplies, located at 11A Caddick Road, South, Knowsley, Merseyside, extends upwards from the ground level and is equipped with antenna and transmission equipment in alignment with the current needs and technical guidelines.
- 2.2 The local context of the site resonates with a mixed pattern, predominately comprising of commercial and agricultural fields in the wider context. Residential buildings rest on the distant outskirts rendering a rather secluded ambiance to the site. In the wider view, Knowsley borough forms a large urban conurbation providing commercial, residential, and green spaces at substantial intervals.
- 2.3 Sensitive visual receptors would mainly be the residential premises bordering the site, few community parks, and a school located 800 meters southeast from the site. Regarding existing screening, the site benefits from several stand trees and hedgerows that align School Lane to the north. These natural screeners significantly lessen the visual intrusion of the existing mast.
- 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:
 - 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 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. This will utilise the MNOs existing 3G and 4G networks such as the base station already existing at the application site. As such, the application site is likely to carry different mobile connectivity services in parallel, with high data uses operating through the new higher capacity network apparatus subject of this application.
- 3.2 Unlike earlier generations of mobile connectivity, the latest technology has more significant technical and operational requirements and this has implications on the amount, height, position and design of the new base station.
- 3.3 The description of the proposed works is as follows:
- “Removal of the existing 15m monopole to be replaced with a 20m lattice tower which will support 6no. antennas and 3no. relocated antennas along with ancillary equipment thereto including ERSs, BOBs, MHAs, and equipment cabin refresh.”*
- 3.4 The radio equipment housing will need to be mechanically ventilated to avoid overheating of equipment. The ventilation equipment is only likely to operate during the day during hot weather. If it is considered specific noise attenuation measures to be necessary, we would be pleased to discuss practicable solutions.
- 3.5 Paragraphs 16 & 17 of the Code of Practice for Wireless Network Development in England, published in March 2022, explains how mobile networks operate. In the annual network rollout information supplied, the operators will have explained their network requirements and the anticipated use of existing sites, including those owned by site infrastructure providers like Cellnex UK.
- 3.6 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 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 There is significant UK Government support for the delivery of upgraded coverage, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. To deliver improvements to existing services and supporting future mobile technologies, it is essential that the planning system looks to support and facilitate new base station installations such as that proposed to meet the Government's Digital Strategy. In addition, modern connectivity, will be essential to help the Government meet its wider sustainability and climate change targets.

Balancing operational and environmental considerations

5.4 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.

5.5 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.

5.6 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.

5.7 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 within paragraphs 114 - 118 of the NPPF and:

- 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). Policy CS2 relates to Development Principles and states the following:

Policy CS2 Development Principles 1) New development in Knowsley and the preparation of subsequent stages of the Local Plan will be expected to support the following development principles: Principle 1: Promote sustainable economic development, tackle the causes of deprivation and disadvantage and narrow the gap between the richest and poorest neighbourhoods by: a) Meeting needs for new housing, employment, retail and other service provision; b) Improving business productivity and employment levels in Knowsley; c) Reducing economic, environmental, education, health and other social inequalities between Knowsley and other parts of the UK; and d) Providing opportunities for positive lifestyle choices and health improvement for people of all ages. Principle 2: Reduce carbon emissions and adapt to the effects of climate change by: a) Contributing to reductions in carbon dioxide emissions from all sources, in line with national targets; b) Ensuring an ability to adapt to future changes to national targets for carbon dioxide

and other greenhouse gas emissions, including recognising the role of new technology; c) Identifying and applying measures offering effective mitigation and adaptation to likely environmental, social and economic impacts of climate change; and d) Meeting appropriate minimum standards for sustainability. Principle 3: Reduce the need to travel and increase accessibility by: a) Selecting locations that reduce the need to travel, especially by car, and enable people as far as possible to meet their needs locally; b) Assisting the Council in achieving a shift towards more sustainable modes of transport for people, goods and freight; c) Encouraging safe and sustainable access for all, particularly by promoting the use of public transport, walking and cycling between homes and employment; and d) Supporting the provision and retention of shared space, community facilities and other local services (such as local shops, health facilities, education provision, meeting places, sports venues, cultural buildings, public houses and places of worship). Principle 4: Recognise environmental limits, protect and enhance environmental assets, enhance local character and promote quality of place by: a) Understanding and respecting the character and distinctiveness of places and landscapes; b) Protecting and enhancing the historic environment; c) Promoting good quality design and ensuring that development respects its setting taking into account relevant design requirements, and best practice; d) Maximising opportunities for the regeneration of previously developed land, including derelict or unsightly areas to improve the image of Knowsley and use land resources efficiently; e) Mitigating potential negative impacts of traffic growth and road traffic on highway safety, air quality, noise and health; f) Supporting policies relating to Green Infrastructure and the greening of towns and cities; g) Maintaining or enhancing the tranquillity of open countryside and rural areas; h) Maintaining or enhancing the quantity and quality of biodiversity and habitats, including potential impacts on nationally and internationally important sites for biodiversity; i) Addressing any issues of unstable land, resulting from Knowsley's legacy of minerals extraction; and j) Minimising negative impact upon flood risk, air quality, water quality, land quality, soil quality, and noise or vibration levels and ensuring any negative impacts are appropriately mitigated. Development that will have an unacceptable impact upon any of the above will only be permitted where the benefits of the proposal clearly outweigh the harm. Principle 5: Make the most efficient use of available resources and infrastructure by prioritising locations consistent with the spatial strategy, which: a) Do not require major investment in new infrastructure, including transport, water supply and sewerage, or where this is unavoidable, incorporate appropriate development phasing and delivery assistance;

b) Ensure environmental protection is enhanced through the phasing of new development and delivery of supporting infrastructure, including working with neighbouring authorities and key partner agencies where appropriate; c) Support prudent and efficient management of natural and man-made resources; and d) Promote sustainable construction and efficiency in resource use (including reuse and recycling of materials).

- 5.11 Regarding Principle 1, the improved telecommunication services resulting from the upgraded mast significantly support sustainable economic development. It encourages positive lifestyle choices by enabling better internet connectivity for businesses and residents alike, boost employment levels, and provide improved service provision. The updated technology might also help to combat deprivation by bridging the digital divide across the borough, offering equatable internet services for all.
- 5.12 The proposal aligns with Principle 2 by abetting in reducing carbon emissions. Enhanced connectivity through the upgraded mast could contribute to reducing the need for travel for commercial intents, hence reducing carbon emissions. Moreover, the deployment of new efficient technology within the infrastructure points towards Knowsley's sustainability standards.
- 5.13 Regarding Principle 3, the proposed development could reduce the need for travel by offering improved local connectivity, thereby encouraging local corporations to operate more remotely. By doing so, it can contribute to mitigating traffic and consequentially benefit the environment.
- 5.14 Principle 4 is adhered to by respecting the character of the area. The technological enhancement ensures good quality, respecting the setting and leaving a minimum impact on the viewing receptors, owing to the screening already in place. Furthermore, it should be noted that the proposal will not disturb any known biodiversity, which aligns with the principle's condition on protecting biodiversity.
- 5.15 Lastly, in line with Principle 5, the proposal maximizes the efficient use of available infrastructure. The location does not require major infrastructure investment and promotes sustainable construction through the recycling of the existing mast and the use of modern, efficient materials for the new installation. It points towards prudent management of man-made resources.

5.16 Policy CS4 relates to Economy and Employment and states the following:

Overall Employment Development Strategy 1) Planning, site assembly and other available interventions will be used to: a) Support sustainable economic growth and meet the development needs of established and emerging employment sectors, including the Liverpool City Region key economic sectors; b) Provide sufficient land to meet employment development needs to 2028; c) Enhance the quality and efficiency of land use within existing employment areas; d) Improve accessibility to an appropriate range of jobs, for example by encouraging mixed use employment/residential schemes where appropriate and improving transport linkages between housing and employment areas; e) Address skills and educational barriers to employment; f) Encourage recruitment targeted towards communities living in and around the development site; g) Support new start up businesses including social enterprise; h) Encourage homeworking through improvements to digital communications and telecommunications infrastructure; i) Support the diversification of the rural economy; and j) Support the appropriate development of tourism facilities.

5.17 Underneath point a), the proposal would support economic growth and the development needs of potential employment sectors, with the amplified digital and telecommunication coverage encompassing Liverpool City Regional key economic sectors.

5.18 With regard to point b), the proposal doesn't directly provide land for development but improves the overall infrastructure and attractiveness of the site, which could encourage future investment and development.

5.19 Focussing on point c), the proposal enhances the quality and efficiency of land use within the existing employment areas by boosting the connectivity, potentially enhancing operational efficiency.

5.20 As per point d), this proposed development improves accessibility to jobs by facilitating digital connections. It empowers remote working arrangements and bridges the communication gaps between various working sectors.

- 5.21 Regarding point e), while the proposal itself doesn't address educational barriers, enhanced connectivity could indirectly aid in accessibility to online educational resources and e-learning platforms, helping boost skills and qualifications.
- 5.22 For point f), whilst recruitment isn't directly supported by the proposal, adequate telecommunication services could encourage businesses to settle in the area, thus promoting local employment opportunities.
- 5.23 Under point g), the installation indirectly aids start-up businesses, including social enterprise, by providing robust telecommunication services necessary for their functions.
- 5.24 As point h) states, the mast installation would significantly encourage home working through improvements to digital communications and telecommunications infrastructure.
- 5.25 While not directly related to the rural economy (point i)) or tourism (point j)), improved telecom services could make these areas more attractive for business and leisure activities.
- 5.26 Overall, the proposed mast installation aligns with the majority of the 'Overall Employment Development Strategy' objectives and could indirectly foster sustainable economic growth and connectivity within the broader region.
- 5.27 Policy CS7 relates to Transport Networks and states the following:

Policy CS7 Transport Networks Overall Transport Strategy 1) Planning powers and other interventions will be used to support a sustainable and integrated transport system that will: a) Support the economy by facilitating efficient movement of people and goods within the borough and linking to Liverpool City Centre, the Port of Liverpool, Liverpool John Lennon Airport and other destinations in the surrounding area; b) Help meet the development needs of the borough through to 2028; c) Ensure people can get to where they need to by a choice of walking, cycling and public transport; d) Enhance road safety; e) Seek to reduce carbon emissions; and f) Improve the health and wellbeing of local people. Location, Design and Management of New Development 2) New development will be required to be: a)

Located and designed to prioritise accessibility and sustainable modes of travel through a choice of walking, cycling, public transport, and incorporate access for private vehicles. Where deficiencies are identified, developer contributions will be required to improve the accessibility of the location; b) Located and designed to ensure that larger scale proposals (attracting a lot of visitors, customers and/or employees) are located in the most accessible locations; c) Where subject to a planning application, accompanied (except in the case of smaller scale proposals) by Transport Assessments and/or Travel Plans; d) In compliance with adopted cycle, car, disabled and service vehicle parking standards for different types and scales of new development; e) Inclusive of measures that will mitigate carbon emissions and improve air quality where appropriate; and f) Consistent with safeguarding arrangements that secure the operational integrity and safety of Liverpool John Lennon Airport. Strategic Transport Schemes and Programmes 3) The Council will work with national, regional and sub-regional partners to deliver schemes which support Local Transport Plan priorities including: a) Further transport infrastructure that is necessary to support the future expansion of Liverpool John Lennon Airport consistent with its Surface Access Strategy and national aviation policy; b) Improvements to the rail network including: electrification of existing lines; enhancements to stations and passenger interchange facilities; provision of Park and Ride facilities; and expansion and/or improvement of the Knowsley Rail Freight Terminal; c) Enhanced provision for buses, including improved bus stations, bus stops and laybys, and the enhancement of the principal bus routes through Quality Bus Partnerships and Quality Bus Contracts; d) Maintenance of transport hubs such as bus termini and train stations to give improved safety; e) Enhanced provision of walking and cycling routes as part of the Green Infrastructure network (see Policy CS8: Green Infrastructure); and f) The roll out of infrastructure for low carbon emission vehicles. 4) Developer contributions towards strategic transport schemes and programmes will be sought in accordance with Policy CS27: Planning and Paying for New Infrastructure, the Developer Contributions Supplementary Planning Document and/or a Community Infrastructure Levy Charging Schedule. 5) Further guidance on transport issues and local parking standards are provided in the Ensuring a Choice of Travel Supplementary Planning Document or revisions to this.

- 5.28 Although the proposed development doesn't directly align with all aspects of "Policy CS7 Transport Networks," it complements several policy objectives, especially in promoting digital infrastructure, encouraging remote working, sustainable practices,

and indirectly supporting physical mobility networks. As a result, it would form a crucial part of the overall visionary and strategic planning for the Knowsley.

- 5.29 Policy CS19 relates to Design Quality and Accessibility in new development and states the following:

Policy CS19 Design Quality and Accessibility in New Development

1) To enhance the local distinctiveness, identity and accessibility of places, new development within Knowsley will be expected to:

- a) Respond to and integrate positive characteristics of immediate surroundings, including local materials, scale, mass, form, layout, alignment and density of the existing built environment;
- b) Complement and enhance (where possible), existing landscape, topography, Green Infrastructure; and features of local importance and historic interest;
- c) Consider provision of landmark buildings and additional detailing at and adjacent to main gateways, movement corridors, town centres and strategic regeneration opportunities;
- d) Create spaces and places as a focal point, accommodating social interaction and active lifestyles, including provision and integration of high quality public realm and open spaces, public art (as appropriate); and landscaping which promotes biodiversity and integrates existing local habitats;
- e) Provide safe, secure and convenient routes for movement (including signage), with priority for walking, cycling and public transport, to meet the access needs of all users, particularly pedestrians, cyclists, less mobile people and the elderly;
- f) Integrate effectively with existing development and link to existing shopping and service provision; and
- g) Demonstrate community engagement during the design phase of major development proposals.

2) To maintain a good standard of amenity for all existing and future occupants of land and buildings, development proposals will be required to:

- a) Avoid unacceptable impacts on existing residents, business occupiers, and future occupiers;
- b) Minimise crime, fear of crime and anti-social behaviour, including good levels of natural surveillance and security; and
- c) Accommodate future maintenance and long term management requirements.

3) To address the challenges of climate change and future changes in social, economic and environmental priorities, new development should integrate:

- a) Sustainable design principles, with regard to Policy CS17: Housing Sizes and Design Standards and Policy CS22: Sustainable and Low Carbon Development as appropriate;
- b) Biodiversity (in accordance with Policy CS8);
- c) Flood risk mitigation (in accordance with Policy CS24);
- d) Waste recycling; and
- e) Energy and resource efficiency.

4) Further guidance on these issues will be provided in the Local Plan: Site Allocations

and Development Policies document and Supplementary Planning Documents as appropriate.

- 5.30 The proposed replacement of the existing 15m monopole with a 20m lattice tower aligns with "Policy CS19 Design Quality and Accessibility in New Development" in numerous ways. The planned development will maintain harmony with the existing environment respecting the overall local landscape and topography, integrating with the present infrastructure without compromising Green Infrastructure or sites of historical relevance. Although not a landmark structure, it will upgrade Knowsley's technological landscape, with a minimal impact on residents or businesses, implemented with strategic planning to mitigate disruption during construction. Though the development does not directly involve community engagement or affect biodiversity, it's designed to have minimal environmental consequences with its minimal footprint and sustainable resource usage. Furthermore, the infrastructure project is not located in a flood risk area, mitigating associated concerns. By improving telecommunication services, the project promotes remote working, reducing the need for travel, thereby indirectly contributing to sustainable development and resource efficiency. In essence, the proposed development largely complies with the principles of Policy CS19, ensuring sustainable and locally integrated development.
- 5.31 The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operator and minimising environmental impact.

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. With regard to the main component elements of the development proposed:

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 pre-engagement process. Whilst the lattice structure proposed will be evident from any near views, the latticework will help ameliorate presence over distance, especially from views where there is a background or foreground of vegetation. That said, the local topography will limit such views from public vantage points and any sensitive visual receptors.
- 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.
- 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.
- 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.