

Our ref: 7130

Date: 26/3/2026

The Chief Planning Officer
Knowsley Metropolitan Borough Council
Planning Services
Municipal Buildings
Huyton
Knowsley
L36 9UX

Dear Sir/ Madam,

VMO2 and Cellnex UK

Submission of an Application for a Prior Approval Determination

Proposed replacement of existing mast for VMO2 at Cellnex UK site: Liverpool Flukers Brook Lane, Woods At Cottage Farm, Flukers Brook Lane, Knowsley, Liverpool, Merseyside, L34 7HB (NGR E: 342628 N: 394605)

On behalf of Cellnex UK, in conjunction with VMO2, we submit herewith an application for a prior approval determination for the installation of an upgrade to an existing mobile base station at the above site.

The application is submitted in accordance with the requirements of Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, and seeks a determination as to whether the Authority's approval will be required for the siting and appearance of the development.

The application comprises:

- i. The installation of 1 no. replacement 25m lattice mast onto new concrete base to accommodate 9 no. antenna, ancillary radio equipment, and 1 no. 0.3m and 2 no. 0.6m transmission dishes, 2 no. equipment cabinets and ancillary development thereto within extended fenced compound.
- ii. An O.S. site plan scale showing the red line area has been submitted via the portal.
- iii. Electronic payment of £588 in respect of the appropriate fee has been made via the portal.
- iv. The Developer's Notice served on the landowner and proof of delivery.
- v. The Developer's contact details.
- vi. The Notification served on the operator of the civil safeguarding area.

The following information is also provided to assist with your determination of the application:

- i. The Authority's 1APP form for telecommunications development prior approval applications.
- ii. Drawing nos
03-000A Existing Site Layout
04-001A Existing Elevation
04-101A Proposed Site Plan
04-151A Proposed Elevation
providing further details of the siting, layout and design of the development
- iii. A supporting Planning Statement.
- iv. National Policy - Delivering Ultra Fast Broadband Mobile Connectivity
- v. 5G – Helping tackle climate change document
- vi. 5G Technical Support document
- vii. A statement of compliance with ICNIRP
- viii. 5G Health and Safety document

Developers Contact Details

All correspondence and queries relating the determination of this application should be submitted to the undersigned.

However, in accordance with the requirements of The Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, any correspondence to the developers should be sent to:

For Cellnex UK: R+, 4th Floor 2 Blagrove Street, Reading, RG1 1AZ

For Virgin Media O2, 500 Brook Drive, Reading, United Kingdom, RG2 6UU

Email: planning@cellnextelecom.co.uk

This letter and the enclosures also provide due notification, as may be required, under the relevant conditions of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended. In particular, you are given notice of the intention to install the electronic communications apparatus described in more detail in the application documentation (including the scale drawings) and to be located as shown on the application plans. No fee is required for this separate statutory notification.

We indicated in our prior engagement letter that the Traffic Light Rating was 'green'. The prior engagement carried out suggests this rating to be correct and we have not altered it. Any comments or concerns will be considered as part of the application progress. We have written to the ward councillor who represents the area and no comments or concerns have been received. Should any comments be received, they will be forwarded on.

The Scope of the Prior Approval Determination

The permitted development rights granted by Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended (the GPDO), exist to facilitate the establishment of modern communications apparatus and infrastructure judged by successive governments to be important to a modern economy and in attaining sustainability objectives.

The permitted development granted subject to the prior approval procedure is similar to the grant of outline planning permission, with details of precise siting and appearance being reserved. This is explained at Annex A Glossary of Code of Practice for Wireless Network Development in England, March 2022. The National Planning Policy Framework is also accordingly clear that permitted development rights should not generally be withdrawn.

As a consequence, the scope of determination does not extend to whether the site selected is needed, as the development is acceptable in principle due to the rights conveyed by the GPDO. Likewise, whilst information on alternative sites may be supplied by way of background and context, the extent of control on siting is limited to the precise siting on a site and not the general location.

As the principle of development at the application site is permitted by the GPDO, this submission focuses on the statutory criteria of detailed siting and appearance. In so doing, this is considered against current town and country planning guidance, including the development plan which are material considerations, and with reference to the operational requirements of the operator and the attempts to accommodate the particular requirement.

Health and Safety

Every installation on a site owned or managed by Cellnex UK will be compliant with international standards adopted by the UK Government. A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.

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.

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.

Paragraph 100 of the Code of Practice indicates that where appropriate supplementary information will be submitted with the application, and we trust all the supporting material submitted in

fulfilment of this is of assistance. However, if you do require any clarification or further information, please let us know immediately.

Whilst as a matter of best practice extensive supporting material is submitted, the lawful scope of determination remains confined to the detailed siting and appearance of the apparatus proposed. The permitted development rights exist to facilitate the establishment of modern communications,

judged by successive governments to be important to a modern economy and in attaining sustainability objectives.

We would be willing to meet with you or assist with any visits to the site and the surrounding area if this is beneficial to the determination of the application.

Finally, your attention is drawn to the statutory 56 days period for the determination of this application of this nature upon which detailed advice is given at paragraph 101 onwards of the Code of Practice for Wireless Network Development in England.

We trust everything is in order, but if you do require any further information or clarification, please do not hesitate to contact me.

Yours faithfully,

Matthew McGimpsey
For and on behalf of VMO2 and Cellnex UK
Assistant Planner
United Infrastructure Ltd