

Town Planning Statement

Electronic Communications Base Station

At Existing Cellnex Site

**Liverpool Flukers Brook Lane, Woods At Cottage Farm, Flukers
Brook Lane, Knowsley, Liverpool, Merseyside, L34 7HB (NGR
E: 342628 N: 394605)**

**Site Reference: NCO-0007130
CELLNEX and VMO2**

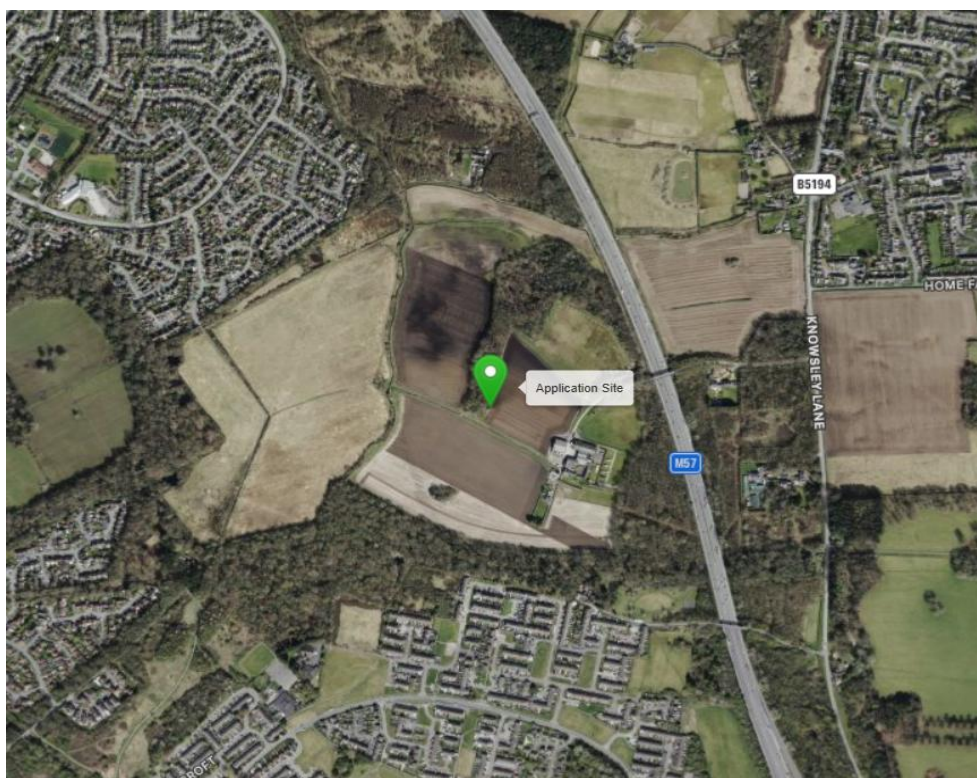
March 2026

1. INTRODUCTION

- 1.1 This statement is submitted in support of an application for prior approval for an upgrade to an existing established site for the mobile network operator VMO2 by Cellnex UK. 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 application site is an established telecommunications base station located on land at Cottage Farm. The site is accessed via Flukers Brook Lane and is positioned adjacent to mature woodland. To the north of the site is the M57 motorway, with Knowsley Village located beyond. To the east, beyond the motorway, is woodland and the grounds of the Knowsley Hall Estate. To the south, beyond the intervening woodland, is the residential area of Stockbridge Village. To the west, are the grounds of Croxteth Hall and Country Park, with further residential development within the Croxteth Park area beyond. The site is located on the urban fringe and is well separated from residential development, with intervening woodland limiting views from public vantage points.
- 2.2 The base station site currently comprises a 22.5 metre monopole mast with an open headframe supporting antennas and associated equipment. The installation is located in close proximity to existing trees and woodland, which provide effective natural screening. The site is not within any statutory landscape or heritage designations and is well located to accommodate upgraded telecommunications infrastructure, supporting connectivity across the surrounding area, including the adjacent motorway corridor.



Aerial view of site (Source: Apple Maps)



Eastern elevation of existing site from access point.

3. THE PROPOSAL

- 3.1 The development proposed is shown in detail in the drawings submitted and is for a 5G upgrade to an existing electronic communications base station. The deployment of 5G will utilise the MNO's existing 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 5G higher capacity network apparatus subject of this application.
- 3.2 Unlike earlier generations of mobile connectivity, 5G has more significant technical and operational requirements and this has implications on the amount, height, position and design of the base station. To help explain this important detail, we have set this out in the accompanying **"5G Technical Support"** document, which must be read in conjunction with this planning statement.
- 3.3 The principal elements of the proposed development at the application site reflect these various siting and design factors within the technical support document:
- The removal of the existing 22.5 metre monopole mast.
 - The installation of a replacement 25 metre lattice mast onto new concrete base, to accommodate 9 no. antenna, and ancillary radio equipment onto new headframe.
 - The relocation of 1 no. 0.3m and installation of 2 no. new transmission dishes onto proposed headframe.
 - The Installation of 1 no. GPS Module onto proposed gantry pole within compound.
 - The extension of the fenced compound and the installation of 2 no. new equipment cabinets.
 - The installation of cabling and associated development.
 - Ancillary development thereto.
- 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, this remains as existing and established at the site.

- 3.5 Paragraphs 16 and 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 for 5G 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 5G 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 National Planning Policy Framework (NPPF) and the Code of Best Practice on Mobile 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 'green' when assessed against the traffic light rating model reflecting the proposal which is a replacement mast at an existing established site. We have informed the ward councillors who represent the area, and no comments have been received to date. Should any further comments be received, they will be forwarded on.
- 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. As we have not received any response from your authority we would be pleased to address any concerns within the determination period of the application.

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 on Wireless Network Development in England.

5.2 From these documents it 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 a 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 5G, 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. Our accompanying document of national policy '**National Policy - Delivering Ultra Fast Broadband Mobile Connectivity**' sets out how 5G mobile connectivity will underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. To deliver improvements to existing services and supporting future mobile technologies, it is essential that the planning system looks to support and facilitate new 5G base station installations such as that proposed to meet the Government's Digital Strategy. In addition, modern connectivity, such as 5G, will be essential to help the Government meet its wider sustainability and climate change targets and we explain this in more detail in our accompanying document '**5G – Helping tackle climate change**'.

Balancing operational and environmental considerations

5.4 The special operational and technical factors that require specific siting of a 5G 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 for 5G, 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 planning new 5G 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, the site 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 structurally incapable of supporting more radio apparatus at the height required for 5G. 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. The site is well located to serve residents, visitors and road users visiting the Country Park and travelling along the nearby motorway corridor. Within this context the replacement mast will be seen as an acceptable and justified use providing social and economic benefits, reflecting all of the considerations within paragraphs 119 - 123 of the NPPF and:
- The 5G base station is required as part of a national mobile communications network, necessary to extend and improve mobile connectivity to the local area;
 - 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 which is an established and accepted feature within the landscape.

- The proposal to upgrade the existing base station by the installation of a replacement mast looks to strike the optimum solution, particularly when compared with the alternative of erecting a new, additional base station elsewhere and the development of an associated compound on a site nearby and with it the associated additional resources in developing an additional 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 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 for the replacement of the existing structure up to 25m in height is a material consideration in the determination of the application and represents a realistic fall-back position.

The Need to Protect the Green Belt

- 5.9 The application site falls within the Green Belt. The general presumption in favour of allowing development for modern communications, and the special operational and technical factors that require siting of base stations, is balanced by Green Belt protection policies.
- 5.10 As the proposal already benefits from planning permission under the provisions of Class A of Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, the issue of inappropriate development and the related test of very special circumstances do not arise in this case. Similarly, as the proposal benefits from the permitted development rights granted by the Order, it does not offend any of the five purposes of including the application site within the Green Belt.
- 5.11 The issues for determination relate solely to the siting and appearance of the development, which is acceptable having regard to the technical and operational constraints of providing specific coverage for the operator. Importantly, there are no sites located outside of the Green Belt that are preferable, suitable or available

alternatives to the proposal and it, therefore, accords fully with Green Belt planning policy. This is especially case as the proposal involves the replacement of an existing mast which is already an established feature existing at the site and within the Green Belt.

Code of Practice for Wireless Network Development in England (March 2022)

- 5.12 The Code of Practice (CoP) provides guidance to Code Operators, including Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure. The aim of the CoP is to support The Government's objective of delivering high-quality wireless infrastructure whilst balancing these needs with environmental considerations.
- 5.13 Regarding Principles and Commitments paragraph 8 of the CoP reiterates that Digital connectivity is vital to enable people to stay connected and businesses to grow and that fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK and at paragraph 19 emphasises the need for LPAs to support the expansion of the telecommunications network.
- 5.14 Regarding siting and design principles the CoP acknowledges that the choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, and that Operators should make efforts to reduce visual impacts where possible.
- 5.15 Paragraph 39 notes that *'Placing a mast within or adjacent to an existing group of trees, vegetation and other natural features can reduce visual impact.* Paragraph 69 states *"Existing masts may be required to be strengthened or replaced with a larger, lattice-type structure. This may be desirable and more appropriate in rural areas, but less so in more urban environments, where greater densities of base stations will be required"*.

Local Policy Considerations

- 5.16 At the local level, the proposal has been assessed against the relevant adopted policies of the Knowsley Local Plan Core Strategy, adopted in January 2016, which forms part of the statutory Development Plan for the area. The proposal has also been considered against the relevant provisions of the National Planning Policy Framework.
- 5.17 Whilst the Core Strategy does not contain a specific policy relating solely to telecommunications development, the importance of high-quality digital infrastructure is recognised throughout the Plan. Paragraph 2.19 identifies communications infrastructure as a key growth sector within the borough's economy, highlighting the need to support and expand telecommunications networks to facilitate economic development and connectivity.
- 5.18 Policy CS4 (Economy and Employment) supports the delivery of infrastructure necessary to facilitate economic growth, including the enhancement of digital communications. In particular, the policy seeks to:
- “Encourage homeworking through improvements to digital communications and telecommunications infrastructure.”*
- 5.19 The proposed development will contribute towards this objective by supporting improved network capacity and coverage, thereby enabling more reliable connectivity for residents and businesses.
- 5.20 The Core Strategy further recognises digital infrastructure as a key component of essential infrastructure provision. Paragraph 11.2 confirms that ‘infrastructure’ includes digital infrastructure such as telephone and internet facilities. The proposal therefore represents the maintenance and enhancement of essential infrastructure required to support modern communication networks.
- 5.21 Policy CS27 (Planning for and Paying for New Infrastructure) sets out the overarching approach to infrastructure provision within the borough. The policy supports:
- the safeguarding of existing infrastructure;
 - the maintenance and improvement of existing infrastructure; and
 - the replacement of inadequate infrastructure.

The proposal represents the replacement and upgrade of an existing telecommunications installation and therefore directly accords with these objectives by ensuring the continued operation and enhancement of digital infrastructure

- 5.22 The policy also requires that development should avoid or appropriately mitigate any negative impacts on infrastructure provision. In this instance, the proposal utilises an established base station site at Cottage Farm and does not give rise to any adverse impacts on existing infrastructure. Instead, it provides a clear improvement to network capability within the area.
- 5.23 The application site lies within the Green Belt, where Policy CS5 seeks to restrict inappropriate development. However, the proposal relates to the replacement and upgrading of an existing telecommunications installation at an established site. Further as set out in paragraph 5.10 the proposal already benefits from planning permission under the provisions of Class A of Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, the issue of inappropriate development do not arise in this case.
- 5.24 The proposed development is required to maintain and enhance telecommunications coverage across the surrounding area, including the adjacent motorway corridor and nearby residential communities. The social and economic benefits associated with improved digital connectivity are significant and align with the strategic objectives of the Core Strategy.
- 5.25 By upgrading an existing installation rather than introducing an additional site, the proposal minimises the need for additional telecommunications infrastructure elsewhere. This approach ensures that impacts are contained within an established location and represents the most efficient and sustainable solution.
- 5.26 The proposal therefore represents the most appropriate balance between meeting the operational requirements of the telecommunications network and complying with the relevant policy framework. The development accords with Policies CS4 and CS27 of the Knowsley Local Plan Core Strategy and the relevant provisions of the National Planning Policy Framework.
- 5.27 As a matter of principle, the development proposed is in accordance with the relevant policy framework and should therefore be considered acceptable. The following section will assess the design and siting of the proposal in further detail.

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 listed in Paragraph 20 of the Code of Practice.

Physical Context

- 6.2 The application site is located at Cottage Farm, on the urban fringe within the Metropolitan Borough of Knowsley. The site forms part of an established telecommunications installation and is accessed via Flukers Brook Lane. The immediate surroundings comprise areas of mature woodland and vegetation, with the site positioned adjacent to existing tree cover which provides a high degree of natural screening. The wider area is varied in character, with the M57 motorway located to the north and Knowsley Village beyond, while to the east, beyond the motorway, are further areas of woodland associated with the Knowsley Hall Estate. To the south, beyond intervening woodland, lies the residential area of Stockbridge Village, and to the west are the grounds of Croxteth Hall and Country Park, with further residential development within the Croxteth Park area beyond. The site is well contained within its setting, with surrounding vegetation limiting views from the local area and longer range vantage points.

Design, Concepts & Principles

- 6.3 The scale, layout and design of the development has been guided by the special 5G 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 explained in detail in the '**5G Technical Support**' document. With regard to the main component elements of the development proposed:

5G Mast design

- The proposed lattice mast provides enhanced structural capacity by enabling the efficient shared use of the mast mounting of multiple antennas and dishes

at optimal heights for both operators and represents a future proofed design as indicated in CoP. This is particularly critical for supporting modern communications technologies. The proposed lattice structure, can accommodate current and future network needs on a single structure, reducing the need for additional installations in the area, consistent with paragraph 120 of the NPPF which seeks to minimise the proliferation of masts.

- Unlike a monopole, the open framework of a lattice mast offers a more visually permeable form, reducing its overall mass and ameliorating presence over distance; the CoP confirms that a lattice style structure is usually more appropriate in rural areas.
- The modest height increase from 22.5m to 25m is operationally essential to ensure effective coverage and antenna clearance. The structure has been designed to the minimum dimensions necessary, balancing technical need with visual sensitivity. This height increase is within what benefits from permitted development at Part 16 of the General Permitted Development Order.

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 5G network. The design of these features is very much driven by operational and technical factors.
- Lattice towers provide greater structural capacity than monopoles, enabling the efficient mounting of multiple antennas and dishes at optimal heights. This is particularly critical for supporting modern 4G and 5G technologies. By using a lattice structure, the proposal can accommodate current and future network needs on a single structure, reducing the need for additional installations in the area, consistent with paragraph 120 of the NPPF which seeks to minimise the proliferation of masts.

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. The equipment cabinets at this site are located within a large existing equipment cabin which will remain as existing.

Access Considerations

- 6.4 Access to the site will be provided from the existing access route via Flukers Brook Lane, as illustrated in the location plan.
- 6.5 Once constructed, the development will be unstaffed 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 the 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.
- 6.8 The mast is set amongst a backdrop of trees, which will mitigate its impact in views from public vantage points nearby. The use of a lattice tower, which is a relatively open and permeable structure, will give the impression of allowing views through the mast to the backdrop of trees and the sky, thereby minimising its visual impact.

Appearance

- 6.9 The proposed siting and design of the development has been carefully considered to ensure that its appearance is appropriate within the surrounding context. The application site is an existing, established telecommunications base station located at

Cottage Farm on the urban fringe within Knowsley. The proposal replaces the existing installation with a 25m lattice mast positioned within the existing compound, ensuring that development remains contained within the established site.

- 6.10 The proposed 25m lattice mast falls within the height parameters for Permitted Development under Part 16 of the GPDO. The lattice mast design adopts an open galvanised steel framework which allows views through the structure and reduces its perceived visual mass when seen against the sky and surrounding backdrop. This open-frame design enables the mast to sit more lightly within the landscape when compared to a solid monopole structure.
- 6.11 The lattice mast design is therefore considered to be the most appropriate structure type in this instance, particularly given the site's location proximity to the M57 motorway and within an area influenced by existing infrastructure and urban fringe characteristics, as supported by the Code of Practice. The mast will be viewed in the context of surrounding woodland, motorway infrastructure and the wider landscape setting, all of which assist in filtering and softening views of the development.
- 6.12 The proposed installation represents a functional and technically efficient structure necessary to support modern telecommunications infrastructure. In this case, the design provides the required operational capability while limiting additional visual impact, ensuring that the development reads as a modest piece of utility infrastructure within an established and well-screened site, rather than appearing as a prominent or incongruous feature within the wider area.

7. HEALTH AND SAFETY

- 7.1 In support of the application, we include a separate document called '**5G Health and Safety**' which sets out in more detail the associated health and safety considerations. 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.
- 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 prior approval.

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 111 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 5G cellular system. These impose particular locational and siting requirements which are even greater with 5G. 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 Best 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 within the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle which benefits from permitted development 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.