**Town Planning Statement**

**5G Electronic Communications Base Station**

**At the Existing Cellnex Site / BT Telephone Exchange**

**Slade Green TE**

**Slade Green Road**

**Erith**

**Kent**

**DA8 2HU**

**Site Reference 238775**

**CELLNEX AND MBNL**

**26th September 2021**

1. **INTRODUCTION**

1.1 This statement is submitted in support of an application for prior approval for a 5G mobile base station for the mobile network operators (MNOs) EE Ltd and Hutchison 3G UK Ltd, in conjunction with Mobile Broadband Network Limited (MBNL)*.* The application site is operated by Cellnex, 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 must be read in conjunction with this statement.

**2. SITE AND SURROUNDING AREA**

2.1 The proposal is for the upgrading of an existing rooftop site at the Slade Green Telephone Exchange situated on the southern side of Slade Green Road to the west of the junction with Freeland Way. The building hosts existing antennas and associated support structures at rooftop level and the purpose of the upgrade is to facilitate essential new 5G coverage and improved 2G / 3G & 4G service provision. The site is situated within a mixed use residential and commercial area with a high demand for mobile network services. It is considered that the least visually intrusive solution has been put forward via the upgrading of an existing site rather than the introduction of an entirely new ground-based installation. It is important to note that in addition to being the sequentially preferable solution, the upgrading of an existing rooftop site will fit in within the existing network configuration thereby eliminating the need to introduce additional base stations within the cell search area.

2.2 The proposed upgrade site is housed on the rooftop of a large telephone exchange building that benefits from the screening effects associated with the rooflines of surrounding buildings and nearby mature tree planting defining the boundaries of the exchange site and scattered along the northern side of Slade Green Road. The telephone exchange is situated within a high-density residential area however, there are commercial buildings nearby that will lessen the impact for residential receptors within the target coverage area. The upgraded equipment will be relatively small scale in comparison to the bulk of the host building and will be a significantly less visually intrusive solution than introducing a new ground-based installation within the target coverage area.

2.3 The sharing of base stations between multiple operators is one of the key strategic policy principles contained within Government Guidance. H3G and EE have a network sharing agreement and therefore these installations are fully compliant with the National Planning Policy Framework (NPPF). In keeping with the NPPF guidelines of using “high quality communications” (Section 10), the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing built environment.

2.5 The presence of the existing roof top equipment sets a clear precedent for telecommunications development in this location and indicates that the principle of this proposal is acceptable in terms of siting. As stated above the National Planning Policy Framework advocates site sharing, and as such we believe that there are no sequentially preferable locations within the defined site search area.

2.6 The design of the proposed equipment is considered to be the least visually intrusive option available given the level of equipment required for 5G. Although it is accepted that there will be very marginally intensification in the amount of equipment it is felt that such a minor increase would not detract from the character of the area with any visual effects being significantly outweighed by the immense benefits of the new 5G connectivity.

**3. THE 5G PROPOSAL**

3.1 The development proposed is shown in detail in the drawings submitted and is for a new 5G electronic communications base station. The deployment of 5G 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 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 new base station apparatus on the rooftop of the building. 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 installation / replacement of a rooftop array of freestanding antennas.
* The installation of a replacement radio equipment housing at rooftop level within an existing cabin.
* The installation of cabling and associated development.

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 Section 6 of the Code of Best Practice on Mobile Network Development in England, published in November 2016, 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 radio site infrastructure providers like Cellnex.

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 communication sites, in this case owned / operated by Cellnex.

**4. PRIOR ENGAGEMENT**

4.1 The recently revised 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 an Amber score when assessed against the industry traffic light rating model.

4.2 The pre-application consultation in relation to the application site was undertaken with your Authority and Ward Councillors (Stefano Borella and Brenda M Langstead) and St Paul's (Slade Green) C of E Primary School (The Headteacher). 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. At the time of submission there has been no response to this pre-application consultation and accordingly we would be pleased to address any necessary matters within the determination period of the application.

**5. PLANNING POLICY**

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 Best Practice on Mobile Network Development in England.

1. 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

1. 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. 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

1. 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.
2. However, paragraphs 3.2 – 3.3 of the Code of Best Practice explain that 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 Code of Best Practice emphasises that the NPPF now applies a reduced policy test compared to previous guidance. This helps clarify than 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.
3. In balancing these requirements, the starting point for the 5G networks is to use existing electronic communications sites owned by other operators or radio site management companies, such as Cellnex. 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.
4. In this instance, the installation of apparatus at this existing site owned or managed by Cellnex, where there are existing operations aligns with this longstanding policy.
5. As a matter of principle, the development proposed is in accordance with the relevant policy framework and should 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

1. At local level, the proposal has been considered against The London Plan: Spatial Development Plan for Greater London and the London Borough of Bexley Core Strategy February 2012 and Bexley Unitary Development Plan (Adopted 28th April 2004 – Saved 2007).
2. The London Plan (adopted March 2021) is the new Spatial Development Strategy for Greater London now forming part of the statutory development plan. The document sets out the Mayor’s vision for Good Growth along with a framework for how London will develop over the next 20-25 years.

Policy GG1 Building strong and inclusive communities states:

*Good growth is inclusive growth. To build on the city’s tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:*

1. *Encourage early and inclusive engagement with stakeholders, including local communities, in the development of proposals, policies and area-based strategies*
2. *Seek to ensure changes to the physical environment to achieve an overall positive contribution to London*
3. *Provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation*
4. *Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city*
5. *Ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging, which encourage community buy-in, and where communities can develop and thrive*
6. *Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for building relationships during the daytime, evening and night-time*
7. *Ensure that new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements*
8. *Support and promote the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.*

Policy GG 5 Growing a good economy states:

*To conserve and enhance London’s global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:*

1. *Promote the strength and potential of the wider city region*
2. *Seek to ensure that London’s economy diversifies and that the benefits of economic success are shared more equitably across London*
3. *Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration*
4. *Ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London’s growth*
5. *Ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning*
6. *Promote and support London’s rich heritage and cultural assets, and its role as a 24-hour city*
7. *Make the fullest use of London’s existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity*
8. *Recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London’s economic success*

In accordance with the requirements of Policies GG1 and GG5 the proposal will deliver reliable critical mobile digital infrastructure by upgrading an existing base station allowing for the provision of essential new 5G coverage.

1. The Bexley Local Plan includes the following relevant policies: Bexley UDP policy ENV45 Telecommunications Apparatus, UDP Policy ENV39 Built Environment, Bexley Core Strategy Policy CS01 Achieving sustainable development and Bexley Core Strategy Policy CS09 Using Bexley’s resources sustainably,

Policy ENV45 Telecommunications Apparatus states:

The Council recognises the need and desire for telecommunications equipment in order to facilitate the growth of telecommunications systems and will give favourable consideration to proposals, provided that they meet the criteria set out in this policy, in Government Guidance and in Statutory Regulations, as relevant. In particular, the Council will seek to ensure that satellite dishes, terrestrial microwave antennas, aerials and all other telecommunications equipment should only be located in such a way as to minimise any adverse effects on the character or visual amenity of the area.

In considering any proposals for telecommunications equipment, bearing in mind the limitations imposed by lines of sight, technical issues and legal requirements, the Council will need to be satisfied that:

1. all alternative locations or means of telecommunication have been fully explored;
2. there is no reasonable possibility of sharing existing facilities, particularly masts;
3. in the case of antennae and masts, there is no possibility of locating these on an existing building or other structure;
4. the siting, design, materials, colour and appearance of the equipment should minimise the visual impact of the development on the environment, with screening and landscaping where relevant; and
5. where a satellite dish or other equipment is to be located to serve an individual property, its location should be carefully chosen so as to minimise the impact on the appearance of the building and consideration should be given to alternative locations for the equipment at low level within the site.

The Council will normally refuse any application or intervene on any developments by telecommunications operators which would adversely affect Conservation Areas, scheduled Ancient Monuments, statutorily listed buildings and buildings of local interest, Sites of Special Scientific Interest, registered historic parks and gardens or other areas of sensitive landscape.

Bexley UDP Policy ENV39 Built Environment states:

In order to protect and enhance the quality of the built environment, the Council will seek to ensure that all new developments, including alterations and extensions, changes of use and other operations, including highway improvements, are satisfactorily located and are of a high standard of design and layout. In determining applications for development the Council will consider the extent to which the proposal:

1. is compatible with the character of the surrounding area, would not prejudice the environment of the occupiers of adjacent property, or adversely affect the street scene by reason of its (a) scale, (b) massing, (c) height, (d) layout, (e) elevational treatment, (f) materials and/or (g) intensity of development;
2. is appropriately landscaped, including the retention of appropriate trees and shrubs and the incorporation of public art where relevant;
3. has any unreasonable effect on the surrounding area by reason of noise and any emissions to land, air, or water, and is not, by reason of its location, itself adversely affected by such conditions as may already be in existence within the neighbourhood;
4. makes adequate provision for vehicle parking in accordance with the Council's vehicle parking standards;
5. takes due account of the need to deter crime, both against individuals and against public or private property whilst maintaining an attractive environment; and
6. takes into consideration important local and strategic views, particularly where the proposed development is one which significantly exceeds the height of its surroundings or is located on a prominent skyline ridge.

Bexley Core Strategy Policy CS01 Achieving sustainable development states:

The Council will seek to achieve sustainable development, in line with the vision set out in Bexley’s Sustainable Community Strategy, to create a ‘strong, sustainable and cohesive community’, in order to provide people equal access to a better quality of life, protect the environment, promote the local economy and encourage an active and healthy lifestyle.

The Council will seek to meet the London Plan housing target for Bexley, by seeking to achieve the minimum average housing target of 335 units; and projected growth in jobs, by maximising the potential of the Thames Gateway and London Plan Opportunity Areas; ensuring that higher density, mixed use developments are located in town centres and other accessible locations with supporting infrastructure. These types of development will only be permitted outside of the identified growth areas where it can be additionally shown that they demonstrably contribute to the sustainable development of the borough and that the principles set out below have been applied.

Developers will be required to address the sustainable development principles set out below.

In conjunction with the requirements identified in this Core Strategy, as well as the requirements of all other documents that make up Bexley’s Development Plan, sustainable development will be achieved by applying the following principles:

1. adapting to and mitigating the effects of climate change, including sustainably retrofitting existing building stock where possible;
2. maximising the effective and efficient use of natural and physical resources, including land, water and energy, whilst addressing pollution issues, such as contamination, noise and air quality, to contribute to the health and well being of the community and the environment;
3. ensuring housing provision meets the needs of Bexley’s current and future population, including those unsuitably housed, and that housing type and tenure reflect local circumstances and requirements, as well as other relevant Development Plan targets;
4. helping the borough to continue to play a key role in contributing to London’s economic growth and prosperity;
5. preserving and enhancing the existing network of town centres, including their role as a focus for new services and infrastructure, whilst enhancing the role and contribution of local neighbourhood centres;
6. minimising the distances people need to travel and contributing to the improvement of sustainable transport connections;
7. protecting designated areas, such as metropolitan green belt, from inappropriate development so as to preserve, enhance and promote Bexley’s network of open spaces and waterways, heritage, biodiversity and geological assets;
8. maintaining and improving the best elements of Bexley’s suburban character by ensuring new development reflects or, where possible, enhances the unique characteristics of these areas, including residential gardens and the historic environment;
9. ensuring that building height, mass and setting enhances the character of the surrounding locality, and requiring proposals for tall buildings to make a positive contribution to the existing character of the surrounding area by being of high architectural quality and appropriate to their local and historic context. The eastern end of Bexleyheath town centre has been identified as the best opportunity for locating tall buildings, subject to further detailed analysis. Old Bexley town centre has been identified as an area particularly sensitive to locating tall buildings and is considered inappropriate for tall buildings. While the majority of the borough is not considered appropriate for tall buildings, potential may exist for such development to be considered, for example: in locations which benefit from good public transport accessibility, exhibit an existing local built character that would allow for taller buildings, would not cause harm to heritage assets and the wider historic environment, and would not increase the risks of flooding, subject to further detailed area/site analysis and meeting various criteria;
10. providing a complementary mix of land uses as part of well designed developments in order to contribute positively towards meeting the needs of the local community, to create safe and inclusive places, and manage flood risk; and,
11. ensuring existing or proposed infrastructure (including green infrastructure), services and facilities are safeguarded to help improve accessibility and address deficiencies, and that adverse impacts of development, including waste arisings, are mitigated.

Bexley Core Strategy Policy CS09 Using Bexley’s resources sustainably states:

Development that seeks to maximise the effective and efficient use of natural and physical resources, while contributing to the health and well-being of the community and the environment, will be encouraged.

The Council will do this by applying the requirements outlined in national and regional planning policy and guidance to new development, in particular the requirements of the Mayor’s London Plan with regard to open space and the Blue Ribbon Network, energy and water supplies and resources, air and water quality, water and sewerage infrastructure, noise reduction, contaminated land, hazardous substances and sites and minerals.

In addition, this will include:

1. protecting, enhancing and promoting green infrastructure, including making the borough’s parks, open spaces, waterways and recreational facilities an integral part of encouraging healthy lifestyles;
2. making best use of existing physical infrastructure (e.g. sewerage, water supply, telecommunications, transport) and working with partners to ensure infrastructure networks within the borough contribute to improving the health, safety and wellbeing of Bexley’s residents;
3. investigating options across the borough for sustainably managing water supplies and resources (through rainwater harvesting, sustainable urban drainage systems (SUDS) and grey water recycling), as well as opportunities for enhancing biodiversity (e.g. green roofs), within Council-owned buildings;
4. maximising the opportunities to improve health of the environment (e.g. air, surface water, groundwater and soil quality) and reducing pollution and conflicts between adjoining land uses, which is fundamental to providing a good quality of life; encouraging the transport and accessibility functions of the borough’s waterways, particularly to support the carriage of freight (including minerals), and associated facilities (e.g. safeguarded wharves) on the River Thames in particular; and
5. working with partners to make sure any leisure, transport, freight or development activities on and adjacent to the River Thames and other riverside areas are not detrimental to the quality of the environment in those areas.
6. In accordance with the Bexley Core Strategy and saved UDP, the proposal is for a sensitively designed upgrade of an existing shared site housed on the rooftop of the Slade Green Telephone Exchange. In line with the importance UDP Policies ENV45 & ENV39 place on minimising visual impact it is considered that the proposed upgrade will not overly intrude into the locality and any associated visual impact will not outweigh the continued need and future demands to provide coverage to the surrounding area. The visual effects of the proposed upgrade will be relatively minor being of small scale in comparison to the overall bulk of the host building. The BT Exchange rooftop is already home to various existing utilitarian structures including safety barriers, roof access ladders and a generator exhaust system which will help the proposed upgraded equipment to merge with its surroundings. It is felt that the upgrading of an existing rooftop site within the commercial setting of a BT Exchange will be a significantly less visually intrusive solution than introducing a new and entirely separate ground-based facility within the cell search area.
7. The visual effects have been further reduced by keeping the height of the antennas down to the absolute minimum capable of achieving the required coverage and by specifying the narrowest available profile of antenna support poles. The visual effects of the upgrade will be softened by the removal of existing antennas to be replaced by the upgraded equipment. It is also worth stating that the ancillary equipment enclosure upgrades will be set back from the edge of the roof thereby reducing the visual impact.
8. The visual effects of the proposed upgrade will be further reduced by the screening effects associated with mature tree planting defining the boundaries of the Exchange site and by the high roof lines of the surrounding buildings. The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operators and minimising environmental impact.

**6. DESIGN CONSIDERATIONS**

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, as amended. 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 Appendix A of the Code of Best Practice.

**Physical Context**

1. The proposed upgrade site has been carefully selected in a position capable of providing the required new essential 5G coverage within the commercial setting of a large BT Exchange. The scale of the upgraded equipment will be relatively minor in comparison to the overall bulk of the host building and the visual effects of the upgrade will be softened by the removal of the existing antennas that will be replaced by the upgraded equipment. The height of the equipment has been kept down to the absolute minimum capable of providing the required coverage and the ancillary equipment enclosure upgrades have been positioned out of sight within an existing cabin. The upgrading of a shared existing facility has eliminated the need to provide two new and entirely separate additional base stations within the target area.
2. The visual effects of the proposed upgrade will be softened by the screening effects associated with the mature tree planting defining the boundaries of the exchange site. These masking effects will be further enhanced by scattered tree planting on the northern side of Slade Green Road and by the high rooflines of the surrounding buildings. Whilst it is acknowledged that there are residential properties within the locality the proposed upgrade site has been carefully selected on a large telephone exchange building situated as far away as technically possible from the views of residential receptors.

**Amount, Design, Layout and Scale of the Development**

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

* **Kept in proportion to the building or structure**

The scale of the apparatus is not large and when installed should look proportionate to the structure as a whole.The antennas are similar to the existing electronic communications apparatus installed on the building although a marginal height increase will be necessary to meet the special technical and operational requirements of 5G. They will therefore be seen in the context of this apparatus and will not appear as incongruous or jarring additions to the building.

* **Respect architectural style**

Within the severe technical constraints, the apparatus shall be installed in a manner that respects architectural style. The scale of the equipment has been kept down to the absolute minimum capable of providing the required coverage and elements of the existing building have been incorporated in the design to screen views of the equipment wherever possible.

**Have minimal impact above the roofline commensurate with technical constraints**

The apparatus that projects above the roofline has been kept to the minimum having regard to the technical parameters and design considerations explained above. The impact on the apparatus remains contained and new views towards this apparatus from the local vantage points remain limited.

* **Not be detrimental to views and general skyline**

A combination of design, topography and natural and manmade features should help keep any perceived changes to views and the skyline to within acceptable limits. Indeed, within the context of this urban location the attention of the casual observer is likely to remain be focussed more upon the streetscape.

* **Avoid creating clutter**

The apparatus should not look unduly cluttered and insofar as it might be visible it will be viewed as operational electronic communications equipment compatible and now expected on a building designed and constructed exclusively for electronic communications purposes.

* **Use clean lines and maintain symmetry**

The apparatus has clean lines and has been sited to maintain symmetry with both the building and its different elements.

**Antenna Array**

* The numbers of antennas and dishes and their size has been kept to the minimum necessary to provide 5G 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**

1. Access to the site will be provided from the existing rooftop access points.
2. Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.
3. 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**

1. The proposed siting of the development has been very carefully chosen to minimise environmental impact. The height of the apparatus on an existing rooftop means that any attempt to screen it in its entirety would be unrealistic in any event.
2. The proposed upgrade site benefits from the screening effects associated with mature tree planting defining the boundaries of the exchange site and scattered along the northern side of Slade Green Road and the high rooflines of the surrounding buildings. The ancillary equipment has been installed within an existing equipment cabin to mitigate its impact in views from public vantage points nearby. For these reasons, additional landscaping is not considered necessary or appropriate to the setting and has not been included within the scheme.

**Appearance**

1. 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 apparatus may be visible, they should look straight forward in appearance and reflect its 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, 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 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 planning permission.

**8.** **SUMMARY AND CONCLUSIONS**

8.1 In summary, the application is in respect of a 5G 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, with 5G being the next and highly significant advancement in mobile connectivity. In the UK 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(s) 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.
    - 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.

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.