Town Planning and Heritage Statement

Upgrade of Electronic Communications Base Station
5G Electronic Communications Base Station

At the Existing Cellnex Site / BT Telephone Exchange

Sunderland ATE, St Thomas Street, Sunderland, Tyne and Wear, SR1 1QD (NGR E: 439890 N: 557090)

Site Reference: COM-0025768

Cellnex and BT EE

December 2023

1. INTRODUCTION

1.1 This statement is submitted in support of an application for planning permission for an upgrade to an existing established site for the mobile network operator (MNO) BT EE. The application site is owned / 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 an upgrade of an existing rooftop installation at the Sunderland Telephone Exchange. The building is located on St. Thomas Street and is located within the Sunniside Conservation Area. The six-storey building has a utilitarian appearance which reflects its function and hosts existing antennas and associated support structures at rooftop level. The building itself is set back from the frontage onto St Thomas Street which also assists with the attenuation of the rooftop structures. The site occupies a city centre location, with extensive retail, commercial and city centre residential properties surrounding the site. As a central site it is in an area with a high demand for mobile network services and located at roof level, the rooftop masts are well located and able to serve this busy central area yet remaining largely screened from public views.

2.2 The proposal, is for an upgrade to facilitate essential new 5G coverage at this central location and involves the installation of replacement antenna and ancillary equipment onto two separate existing rooftop structures along with upgrades to equipment cabinets, and ancillary development thereto.

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 of 6 no. new and replacement antenna and ancillary radio equipment onto proposed antenna support poles.
- The installation 1 no. GPS Module to be installed onto proposed antenna support pole.
- The installation of 1 no. replacement equipment cabinet at rooftop level.
- The installation of cabling and associated development.
- Ancillary development thereto.

3.4 The established existing 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 is as 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 radio 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 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 'Green' when assessed against the traffic light rating model as referenced 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. As we have not received any response from your authority, we would be pleased to address any necessary matters within the determination period of the application.

4.3 We wrote to ward councillors on 21 November 2023 ahead of the submission and have received no comment or concerns. Should any comments be received, they will be forwarded on.

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;
- Conservation Area Character Appraisal
- The Code of Practice on 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 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**'.

The Need to Conserve the Historic Environment

5.4 In this case the site falls within the Sunniside Conservation Area site and as such we provide a Heritage Statement in support.

5.5 The Telephone Exchange building that hosts the equipment is not itself protected but is within the Sunniside Conservation Area. The exchange building is approximately 32m / 6 storey commercial building and hosts telecommunications equipment at different roof levels. The rooftop telecommunications site benefits from its city centre location and has been accepted as an essential form of infrastructure in an urban setting. It is a site able to serve this busy commercial area yet located away from street level minimising the effect upon the streetscene and the conservation area. The visual effects of the proposed upgrade will be minor due to the scale of the replacement equipment in comparison to the existing installation and the overall bulk of the host building. The proposed upgrade is the least visually intrusive coverage solution available and has been carefully sited and designed to respect the aesthetics of the sensitive surrounding area. It is important to note that the proposed alterations will not have a negative impact on the Conservation Area.

5.6 A new support pole adjacent to the mast will support antenna GPS Module and ancillary equipment but this will be seen in the context of the adjacent mast which attenuates its visual impact, the additional visual impact is minimal. The upgrade to an established site represents the least visually intrusive solution rather than seeking an alternative site in the area.

5.7 The general presumption in favour of allowing development for modern communications, and the special operational and technical factors that require siting of base stations within Conservation Area / World Heritage sites, is balanced by the need to conserve or enhance their heritage qualities.

5.8 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 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.

5.9 In balancing these requirements, the starting point for planning new 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. 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.

5.10 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.

5.11 Nonetheless, any potential harm the apparatus would cause to the designated heritage asset must be assessed, as set out in NPPF paragraph 195 and how to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. In this case, all reasonable steps have been taken, through careful siting at an existing Cellnex site, to moderate the visual impact of the development, having regard to technical and operational factors. Accordingly, the proposal looks to conserve the heritage asset.

5.12 In so far as there may be any perceived harm, the development proposal will have less than substantial harm to the significance of a designated heritage asset and as such, this harm has to be weighed against the public benefits of the proposal (paragraph 202). In this respect the base station is required as part of a national 5G mobile communications network, necessary to extend and improve mobile connectivity to the local area and has wider public interests. As explained, the target coverage area falls within the designated area and the special operational and technical requirements necessitate siting of new apparatus within it.

5.13 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

5.14 At local level, the proposal has been considered against the Sunderland City Council Core Strategy and Development Plan 2015-2033 adopted in January 2020. Policy BH6 Quality Communications states:

i- *"Development for the installation of new telecommunications infrastructure must demonstrate that:*

ii- There would be no significant adverse effect on the external appearance of the building or on the space in which they are to be located;

iii- There would be no significant adverse impact on the special character and appearance of heritage assets.

iv- The applicant has explored the possibility of sharing facilities, such as masts, cabinet boxes, satellite dishes and antennae on existing buildings or other structures.

v- There would be no significant adverse impact on the visual amenities of neighbouring occupiers."

5.15 We have demonstrated that the proposal, which involves upgrades to an existing, established site, will not result in a significant additional visual impact and has been designed to minimise its impact upon the conservation area representing the best available scheme, and that the upgrade of the existing site is preferable to a new rooftop or ground-based mast elsewhere. The proposal, which is a shared facility is therefore in accordance with this policy.

5.16 The proposed development is considered to strike the best balance between meeting the specific network requirements for the operator(s) 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, 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 addressed from Paragraph 20 of the Code of Practice.

Physical Context

6.2 The application site currently accommodates an existing base station, the scale of the upgraded equipment will be minor in comparison to the overall host building and in relation to the change in appearance from the existing established site. The effects of the upgrade will be minimised by the removal of the existing antennas that will be replaced by the upgraded equipment. The height and bulk of the equipment has been kept down to the minimum capable of providing the required coverage. The upgrading of a shared existing facility has eliminated the need to provide new and entirely separate additional base stations within the target area.

Amount, Design, Layout and Scale of the Development

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. 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 positioned slightly higher to meet the especial 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 as established.

- **Respect architectural style**

  The telephone exchange, although within the conservation area, was designed to provide local connections to the electronic communications networks and has a utilitarian appearance, more in contrast with other heritage buildings within the area. Mobile phone base stations are a more modern wireless form of telephone exchange, but still require many of the operational attributes present. The development proposed therefore fully reflects the function of the exchange and the apparatus proposed can be viewed as an evolutionary requirement.

- **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 elsewhere within the Conservation Area 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.

- **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.

Access Considerations

6.4 Access to the site will be provided from the existing entrance to the Telephone Exchange building on St. Thomas' Street.

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.

Appearance

6.7 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.