# Town Planning Statement

## 4G Electronic Communications Base Station

## At the BT Telephone Exchange

**Milngavie ATE**
**Ashfield Road**
**Milngavie**
**Glasgow**
**G62 6BT**

**Site Reference COM-0024721**

**CELLNEX UK AND MBNL**

**Cellnex UK**

**January 2024**

## 1. INTRODUCTION

1.1 This statement is submitted in support of an application for prior approval for a 4G 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 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. SITE AND SURROUNDING AREA

2.1 The application site is a longstanding telecommunications site on the roof of a BT Telephone Exchange, a three storey building with a roof level of 13.3m and is presently host to electronic communications apparatus operated by EE Limited, Hutchinson 3G UK Limited, Telefonica O2 (UK) Limited, Vodafone and CTIL. It is essential for the existing antenna in situ to be situated at their current heights in order to maximise coverage to the surrounds.

2.2 The local context includes local amenities and residential dwellings which form part of the Milngavie town centre. The BT Telephone Exchange is situated adjacent to Ashfield Road and Main Street, with the existing equipment in situ situated across the entirety of the base station roof. To the north of the site is a Café and retail units which are situated within two storey buildings. To the east of the site is a small grass area which comprises several deciduous trees, beyond which is the B8030. To the south of the site is the Ashfield Medical Practice which is situated within a two storey building. To the west of the site are residential dwellings which vary from 2 to 4 storeys. Vehicular access is provided via an existing access point from Ashfield Road and roof access is provided via existing internal and external routes to roof levels.

2.3 Views of the site from the surrounding area are restricted due to the surrounding built environment, the local topography and deciduous trees. Short distance views of the site are possible from Ashfield Road and the B8030.

2.4 The site is situated within the Milngavie Town Centre Conservation Area and there are two Category B listed buildings within close proximity of the site:

- The Category B listed Corbie-HA, Ashfield Road is situated approximately 35m to the west of the site
- The Category B listed Gavins Mill, Gavins Mill Road is situated 38m to the east of the site

The site is not located within or in close proximity to any statutory landscape designations or sites of nature conservation interest.

2.5 A review of the Council's online planning record shows that the site has applications relevant to telecommunications development as summarised below:

- Application reference: TP/ED/04/0123 – Planning approved in June 2004 for the installation of 3no. 3G antennas onto roof top with all associated ancillary development.
- Application reference: TP/ED/06/1230 – removal of condition 1 in December 2006 of planning permission TP/ED/01/0809 dated 15 Novermber 2001, which imposes a 5 year limitation on the telecommunications development.
- Application reference: TP/ED/15/0064 – Planning approved in March 2015 for the installation of 1 rooftop Antenna and 1 equipment cabinet, including the removal of existing colinear 5m high antenna with ancillary development thereto.
- Application reference: TP/ED/15/0187 – Planning approved in April 2015 for the proposed removal of 12No existing antennas (9No antennas from the existing stub mast and 3No pole mounted antennas on the rooftop) and the installation of 9No new antennas and 1No 0.3m transmission dish onto the existing stub mast on the roof of the Milngavie Telephone Exchange, the removal of 4No existing equipment cabinets and the installation of 2No new equipment cabinets at ground level adjacent to the building. The Officer's Report acknowledged that the site is an established location for telecommunications development and it concluded that the proposal would not have an adverse impact on the property, neighbours and wider street scene.
- Application reference: TP/ED/15/0470 – Planning approved in August 2015 to replace 3No. existing antennas with 3No. new antennas and installing 3No. additional equipment cabinets onto the existing support grillage on the roof.

## 3. THE PROPOSAL

3.1 The development proposed is shown in detail in the drawings submitted and is an upgraded 4G electronic communications base station. The deployment of 4G will utilise the MNOs existing 3G networks such as the base station already existing at the application site. As such, the application site is likely to carry different mobile connectivity services in parallel, with high data uses operating through the new higher capacity network apparatus subject of this application.

3.2 Unlike earlier generations of mobile connectivity, 4G has more significant technical and operational requirements and this has implications on the amount, height, position and design of the new base station.

3.3 The 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 3no. antenna at 15.8m
- The installation of 3no. new antenna at 15.8m, 16m and 16.8m on proposed steelwork
- The installation of ancillary equipment including MHAs, RRUs, BOBs, GPS Module and equipment refresh.

3.4 The radio equipment housing will need to be mechanically ventilated to avoid overheating of equipment. The ventilation equipment is only likely to operate during the day during hot weather.

3.5 Paragraphs 8 – 17 of Planning Advice Note 62: Radio Telecommunications broadly explain how mobile networks operate. In the annual network rollout information supplied, the operators will have explained their network requirements for 4G 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 operators as this will provide the required level of 4G 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 UK.

## 4. PRIOR ENGAGEMENT

4.1 Industry best practice and Planning Advice Note 3/2010 Community Engagement require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal receive a green score when assessed against the industry traffic light rating model.

4.2 In this case, the proposal involves replacement antennas at all but the same height of the antennas which are proposed to be removed. As an acceptable from of development can be brought forward as explained further within this statement, then formal pre-application engagement with the LPA was deemed unnecessary. However, if you do have detailed comments to make on the proposals we should be pleased to discuss these with you at an early stage in the determination of this application.

## 5. PLANNING POLICY

5.1 The relevant planning policy and best practice framework is found principally within:

- National Planning Framework 4 (NPF4), particularly national Policy 24 on Digital Infrastructure;
- The local policy framework set out in the adopted Local Development Plan(s);
- Milngavie Town Centre Conservation Area Character Appraisal;
- PAN62 – Radio Telecommunications.

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 Government support for the delivery of 4G, 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. The Digital Infrastructure Section of NPF4 states that Government planning policy is to *"encourage, promote and facilitate the roll-out of digital infrastructure across Scotland to unlock the potential of all our places and the economy".* The intended outcome is to deliver *"universal and future proofed digital infrastructure across the country"* but also to support local living and reduce the need for travel. The provision of good quality digital connectivity and digital innovation is a golden strand that flows through the 'Regional Spatial Priorities' of the NPF4.

5.4 To deliver improvements to existing services and supporting future mobile technologies, it is essential that the planning system looks to support and facilitate upgraded base station installations such as that proposed to meet the Government's Digital Strategy. In addition, modern connectivity, such as 4G, will be essential to help the Government meet its wider sustainability and climate change targets. Policy 24 of

the NPF4 advises that local planning policy should support the delivery of mobile connectivity, particularly gaps in connectivity and barriers to digital access.

**The Need to Protect the Historic Environment**

5.14 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 Areas, is balanced by the need to still preserve their special qualities.

5.15 The longstanding policy to minimise the potential environmental impact associated with electronic communications development is to avoid the unnecessary proliferation of new radio masts and sites. This policy objective is backed with the statutory obligation placed upon operators to share apparatus, where practicable. This is set out under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended. As a consequence, the starting point for planning new networks or the expansion of existing networks is, therefore, to use existing electronic communications sites owned by other operators or radio site management companies, such as Cellnex UK. In addition, the possibility of using other high structures is also looked at.

5.16 In this instance the installation of 4G apparatus onto the rooftop of this existing operational site owned or managed by Cellnex UK, where there are existing operations, aligns with longstanding policy.

5.17 The site falls within the Milngavie Conservation Area which is covered by the Milngavie Conservation Area Appraisal**.** The 'Historic assets and places' section of NPF4 sets out the Government's national planning policy for the protection of the historic environment in particular Conservation Areas. The intention behind the policy is to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places.

5.18 Having regard to the above, the installation will be seen as an acceptable and justified use, as:

- All reasonable steps have been taken, through careful siting at an existing Cellnex UK site, to moderate the visual impact of the development, having regard to technical and operational factors – any impact will be neutral in the

context of the site and look to preserve the character and appearance of the Conservation Area;

- The target coverage area has been explained and consequently the special operational and technical requirements of 4G necessitate siting of a new apparatus within the Conservation Area;

- The 4G base station is required as part of a national mobile communications network, necessary to extend and improve mobile connectivity to the local area and consequently an important material planning consideration.

5.19 As a matter of principle, the development proposed is in accordance with the relevant policy framework and should be therefore be acceptable. As such, the electronic communications apparatus required will not adversely affect the overall integrity of the Conservation Area or offend the qualities for which the area has been designated. 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**

5.20 At local level, the proposal has been considered against the East Dunbartonshire Local Development Plan 2, which was adopted in November 2022. The proposed development has been assessed against the planning policies contained within the adopted Development Plan that guide development. The below policies are considered relevant and discussed below.

5.21 Policy 10 related to Design and Placemaking and states the following:

*Development of all scales must accord with all of the following design and placemaking principles:*

*A. Be designed to ensure a positive impact on the character, function, identity and amenity of the surrounding area, including compatibility with existing uses.*

*B. Be of a high quality and demonstrate the six qualities of successful place: distinctive, safe and pleasant, welcoming, adaptable, resource efficient and easy to move around and beyond.*

*C. The siting, design and layout of all new development will limit likely greenhouse gas emissions.*

D. *Provide appropriate linkages to transport, neighbouring developments and green infrastructure connections.*
E. *Incorporate sustainable materials, energy, design and construction methods.*
F. *Help to reduce use of the car by prioritising pedestrians, cyclists and public transport services.*
G. *Safeguard and enhance features that contribute to the heritage, character and local distinctiveness of the area, including the historic environment.*
H. *Contribute to a welcoming and safe environment and, if in a town centre, encourage high quality public realm and active frontages.*
I. *Promote healthy, active and inclusive lifestyles including meeting requirements for accessible, good quality and inclusive open space provision.*
J. *Include details on the provision for storage and collection of waste.*
K. *Protect, mitigate and enhance the natural and water environment. Landscaping will protect, enhance, expand, manage or create green infrastructure and the green network. Advance landscaping or temporary greening of development sites will be encouraged.*

5.22 Policy 19 relates to the Historic Environment and states the following in relation to Listed buildings and Conservation Areas and states the following:

*Listed Buildings*

*Development affecting a listed building or its setting shall preserve the building, its setting and any features of special architectural or historic interest which it possesses. The layout, design, materials, scale, siting and land use of the development should be appropriate to its character and appearance of the building and setting. There is a presumption against demolition or other works that adversely affect the listed building or its setting. Listed buildings should not be demolished unless it is demonstrated that the building:*

*C. is no longer of special interest;*

*D. is incapable of meaningful repair;*

*E. demolition is essential to delivering significant benefits to economic growth or the wider community; or*

*F. repair and reuse of the building is not economically viable and has been marketed at a price reflecting its location and condition to potential restoring purchasers for a reasonable period.*

*Planning Permission in Principle is not appropriate for proposals related to Listed Buildings as there is a need to fully assess matters of design. Historic Environment Scotland's Managing Change in the Historic Environment guidance on Use and Adaption of Listed Buildings and Demolition of Listed Buildings provides further guidance.*

*Conservation Areas and Townscape Protection Areas*

*Development within a Conservation Area or Townscape Protection Area, and proposals outwith which will impact on its appearance, character or setting, will preserve or enhance the character and appearance of the designated area. It will be consistent with any relevant Conservation Area/ Townscape Protection Area Appraisal and management plan. There will be a presumption against proposals to demolish an unlisted building in the Conservation Area where it makes a positive contribution to the area's character and appearance. Trees which contribute to the character and appearance of the Conservation Area will be preserved. Planning Permission in Principle is not appropriate for proposals related to Conservation Areas as there is a need to fully assess matters of design. The special qualities and boundaries of the Conservation Areas and Townscape Protection Areas are part of a review of Local Historic Environment Designations. The Plan will be updated in line with the findings of this review.*

5.23 Policy 22 relates to Digital Communications and states the following:

*Digital Communications*

*All development proposals must demonstrate consideration of digital communications infrastructure, including broadband, as an integral component of new homes and business premises. The Council will expect appropriate, universal and future-proofed infrastructure to be included as part of the design process and installed as part of the development. For non-householder proposals, the Council expects developers to work with the broadband industry from an early stage to incorporate high speed broadband connectivity infrastructure into new development, in line with the Digital Strategy for Scotland. Proposals should also consider any requirements identified in Policy 24 and Supplementary Guidance on Developer Contributions.*

*Commercial Telecommunications*

*A proposal for the installation and siting of any new telecommunications equipment should demonstrate that consideration has been given to siting and design options which minimise visual impact and satisfy operational requirements. It should set out the alternatives that have been considered and the reasons for the chosen solution. The site selected will be compatible with its surrounding uses and have no significant adverse impact on the natural or historic environment. The proposal should also include an explanation of how the equipment fits into the wider network.*

*A telecommunications proposal may be appropriate in the green belt where there is no alternative location.*

*Siting and Design*

*Proposals for telecommunications development will be supported provided that the following criteria are met:*

A. *The siting and appearance of the proposed apparatus and associated structures should minimise their individual, and cumulative, impact on the visual amenity, character or appearance of the surrounding area.*
B. *Where attached to a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building.*
C. *If proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures, concealing or disguising equipment and site sharing.*
D. *The siting of equipment should not have an adverse impact on the natural or historic environment.*
E. *A declaration that the equipment and installation is designed to be in full compliance with the appropriate ICNIRP guidelines for public exposure to radiofrequency radiation is submitted.*

*All proposals must include details of the design, including height, materials, landscaping and all components. The proposal must also accord with detailed siting, design and locational criteria set out in Supplementary Guidance: Design and Placemaking.*

5.23 In accordance with Policy 10, the proposed upgrade is a sensitively designed upgrade of an existing shared rooftop installation. In line with the requirements of the policies detailed above placing emphasis on the importance of high-quality design, it is considered that the proposed upgrade of a shared facility 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

5.24 In accordance with Policy 19, any impact will be neutral in the context of the site and look to preserve the character and appearance of the Conservation Area. It is considered that the siting and appearance of the proposal within the Conservation Area should be seen as acceptable on the basis that given the height and scale of the apparatus proposed, would not cause unacceptable harm to the visual amenity of the area. Any harm caused by the proposals would be minimal and outweighed by the numerous public benefits associated with the delivery of an advanced, high quality communications network. The Officer's report of the TP/ED/15/0187 approval recognised that the site is well established. It can be considered that the Telephone Exchange does not contribute to the character and appearance of the Conservation Area and an upgrade of this base station prevents the requirement for a new base station within the Conservation Area. As a result of this, the character and appearance of the Conservation Area is preserved.

5.25 In accordance with Policy 22, the proposal will deliver reliable critical mobile digital infrastructure by upgrading an existing base station allowing for the provision of essential upgraded coverage.

5.26 The proposed development is therefore 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 entails essentially engineering operations and so exempt from the requirement to provide a Design Statement under Regulation 13 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, as amended.

6.2 However, to assist your determination this section provides a description of the process adopted in the design of the proposals and explains the access considerations following guidance within Circular 3/2022 and PAN68. The significant contribution such developments makes towards sustainability objectives has already been outlined in some detail in preceding sections.

6.3 In assessing the development, it needs to be borne in mind that the works relate to the installation of an upgraded base station. Hence, certain features of the development, e.g. the means of access to the site and apparatus, are deliberately restricted for the security of the installation and to accord with ICNIRP guidelines. Other aspects of the development, for example, the height of the proposed antennas, are dictated by technical and operational considerations related to the need to provide an acceptable level of mobile coverage to the local area.

**Design Concepts and Principles**

6.5 The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide coverage to the local area, having regard to the need to minimise visual impact.

6.6 For example, the numbers of antennas and their size is the minimum amount of development required to provide the required level of coverage for the mobile network. The proposed siting of the apparatus also takes account of technical and other considerations, including the following:

- The 4G antennas have to be installed at specific locations and heights to meet the coverage requirements.
- The antennas are similar to the existing electronic communications apparatus installed on the building although higher and closer to the edge of the rooftop to meet the especial technical and operational requirements of 4G and meet ICNIRP compliance.

- The antennas have to be positioned to avoid radio interference with any existing equipment already installed on the building.

- All apparatus has to be maintainable in accordance with general health and safety requirements including the CDM regulations.

- All apparatus has to be installed in a structurally feasible manner.

- All apparatus has to be clear of existing features on the roof such as access points, air conditioning units, roof lights, or other electronic communications apparatus.

- All apparatus has to be installed in accordance with the requirements of the building occupier.

6.7 The design options have been examined within those technical parameters, having regard also to the overriding aims set out in paragraphs 32 and 33 of PAN62 with the principle of minimising contrast between equipment and its surroundings. There are a number of suggested ways in which apparatus might be installed on a building. The following design approaches have also been considered but rejected for the reasons given:

- Flagpoles

  Flagpole designs incorporate an omni directional antenna, i.e. one that transmits and receives over 360 degrees. Such an antenna system has poor operational characteristics, with reduced data handling capacity and reduce geographical coverage. In this case, such an antenna system would not satisfy the operational requirements of 5G and if utilised could result in the need for a further base station.

- Mock Chimneys

  The use of mock chimneys has been explored, but has been discounted for design reasons. In particular, the antennas have to be located at particular locations on the building and a series of mock chimneys at these points would look odd, as they would look incongruous on the building and would not replicate sympathetically the normal design of buildings with chimneys.

- Face Mounting

In addition (delete as applicable), the building is not sufficiently high and clear of obstacles to enable the face mounting of antennas, which need to have a clear view over the wider area to provide the necessary coverage.

- Central Mounting

  The possibility of mounting the antennas centrally in a single group has been explored. This would necessitate the use of a stub mast or a support frame. Such structures would have to have an overall height of around five metres to ensure ICNIRP compliance across the roof, as explained above. On a building of this scale, such a structure would not be an appropriate solution.

- Screening Solutions

  The possibility of screening the apparatus, by way of a false storey or roof made of radio transparent glass reinforced plastic (GRP) has been examined. However, because the building is already dominant in its surroundings, such an option would not be a sympathetic solution in this case.

6.8 Paragraph 57 of PAN62 further outlines the specific aims in relation to installing apparatus on a building and these are addressed accordingly:

- **Be coloured to match the background**

  The equipment proposed will be light grey (RAL7035) and antennas can be painted as desired. If you consider alternative colours to be appropriate please let us know.

- **Be in proportion to the size of 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 higher to reflect the technical requirements of 4G. They will therefore be seen in the context of this apparatus and will not appear as incongruous or jarring additions to the building.

- **Relate to architectural form**

Within the severe technical constraints the apparatus shall be installed in a manner that respects architectural style. Architecture and its style are about function as well as pure design. The telephone exchange was designed to provide local connections to the electronic communications networks and as such, even though it falls within a designated area, its appearance is modern and reflects its operational function. 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. In similar fashion, for example, a railway station, i.e. development required for another form of communications, which now may form part of our built heritage still has to evolve in accordance with new technology and safety requirements. In turn these translate into an array of structures that were often never envisaged when first built.

- **Have minimal impact on the roofline**

  The apparatus that projects above the roofline has been kept to the minimum having regard to the technical parameters and design considerations explained above. Views towards the site from further within the Conservation Area will be minimal and look to preserve its character.

- **Respect important views or skylines**

  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 adverse cumulative effect**

  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 their size has been kept to the minimum necessary to provide 4G coverage and to link this site back into the operators' networks. The design of these features is very much driven by operational and technical factors.

**Access Considerations**

6.9 Access to the site will be provided from the existing internal and external access route in place.

6.10 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.

6.11 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**

6.12 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.

**Appearance**

6.14 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 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 planning permission.

## 8. SUMMARY AND CONCLUSIONS

8.1. In summary, the application is in respect of a 4G 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 4G being the next and highly significant advancement in mobile connectivity. In the UK there are now more than 97 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 4G cellular system. These impose particular locational and siting requirements which are even greater with 4G. 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 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 industry 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 NPF4. 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 planning permission applies.