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Town Planning Statement

5G Electronic Communications Base Station

At the Existing BT Telephone Exchange

HALIFAX ATE
COMMERCIAL STREET
HALIFAX
WEST YORKSHIRE
HX1 1BT

Site Reference: COM-0025123 - HALIFAX ATE

CELLNEX UK AND EE LTD

21st December 2023

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1. INTRODUCTION

1.1 This statement is submitted in support of an application for planning permission for the necessary electronic communications installations and upgrades proposed at an existing mobile base station on the rooftop of Halifax ATE, for the relevant mobile network operator(s) (MNOs) EE Ltd and Hutchison 3G UK Ltd, in conjunction with Mobile Broadband Network Limited (MBNL). 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.

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2. SITE AND SURROUNDING AREA

2.1 At present it is paramount that digital connectivity is supported and maintained throughout the country. In particular the current massive shift in user demand from city centres and places of work to residential areas and suburbs, requires an improvement in coverage and capacity throughout the whole network. The current proposal therefore provides the necessary equipment upgrades and additional capacity for the 5G network.

2.2 The proposal is for the upgrading of an existing rooftop site at the Halifax Automatic Telephone Exchange (ATE). The site comprises a two-storey telephone exchange building with existing rooftop telecommunications installations. Halifax ATE is located within the Halifax Town Centre Conservation Area as shown in Figure 2.1 and there are seven listed buildings within close proximity as shown in Figure 2.2. As such care and attention has been taken to the proposed siting of our telecoms installation and ancillary equipment.

2.3 The building hosts existing flag pole tower and associated support structures at rooftop level and the purpose of the upgrade is to facilitate essential new coverage and help promote connectivity within Halifax. The site is situated within a heavily commercial area however, it should be noted the surrounding environment does benefit from mixed land uses as there are residential properties located throughout Commercial Street. 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 or rooftop installation. It is important to note that in addition to being the sequentially preferable solution, by utilising an existing telecoms rooftop site this will fit in within the existing network configuration thereby eliminating the need to introduce additional base stations within the cell search area.

2.4 The design of the proposed equipment is considered to be the least visually intrusive option available given the level of equipment required for improved network coverage. 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 Halifax area with any visual effects being significantly outweighed by the immense benefits of the new upgraded connectivity.

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Figure 2.1 – *Extract taken from the Calderdale Council Environmental map.*

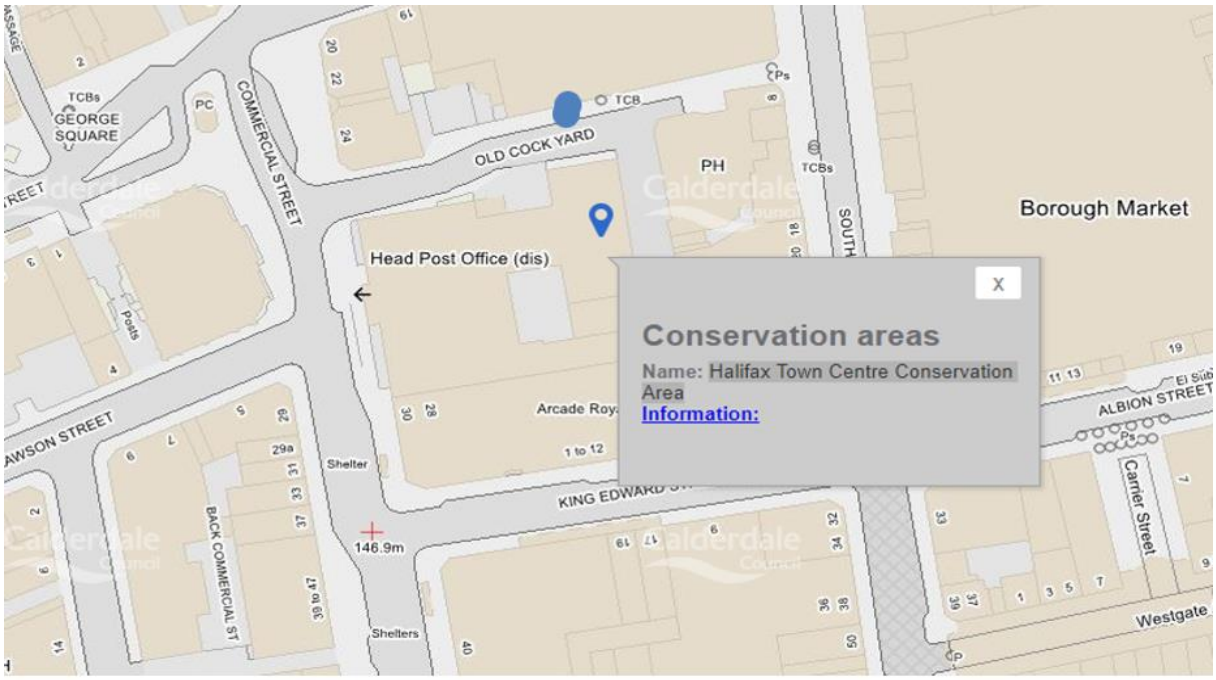

Figure 2.2 – *Extract from Historic England showing the site within close proximity to several listed buildings*

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2.5 Please see Section 5.4 for a heritage statement which emphasises the minimum impact the proposed works will have on the upon the Halifax Town Centre Conservation Area and listed buildings.

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3. THE 5G PROPOSAL

3.1 The development proposed is shown in detail in the drawings submitted and in Figure 3.1 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:

- Replacement of 1No Alpha Wireless AW3363 tri-sector antenna at 23m height with 1No Alpha Wireless AW3836 tri-sector antenna at 23.4m on existing flagpole
- Installation of 1No GPS node at 19m height on proposed gantry pole
- Installation of 1No D-AIRO cabinet on proposed 2No 2.8m long brackets fixed to existing steel beams
- Removal of 1No 3900A cabinet installed on steel grillage
- Removal of 6No combiners, 3No mast head amplifiers (MHA), 3No remote radio units (RRU) and 1No Mk1 BOB fixed to grillage handrail
- Installation of 3No combiners, 3No ERSs and 6No Mk2 BOBs on proposed gantry pole
- Installation of ancillary equipment

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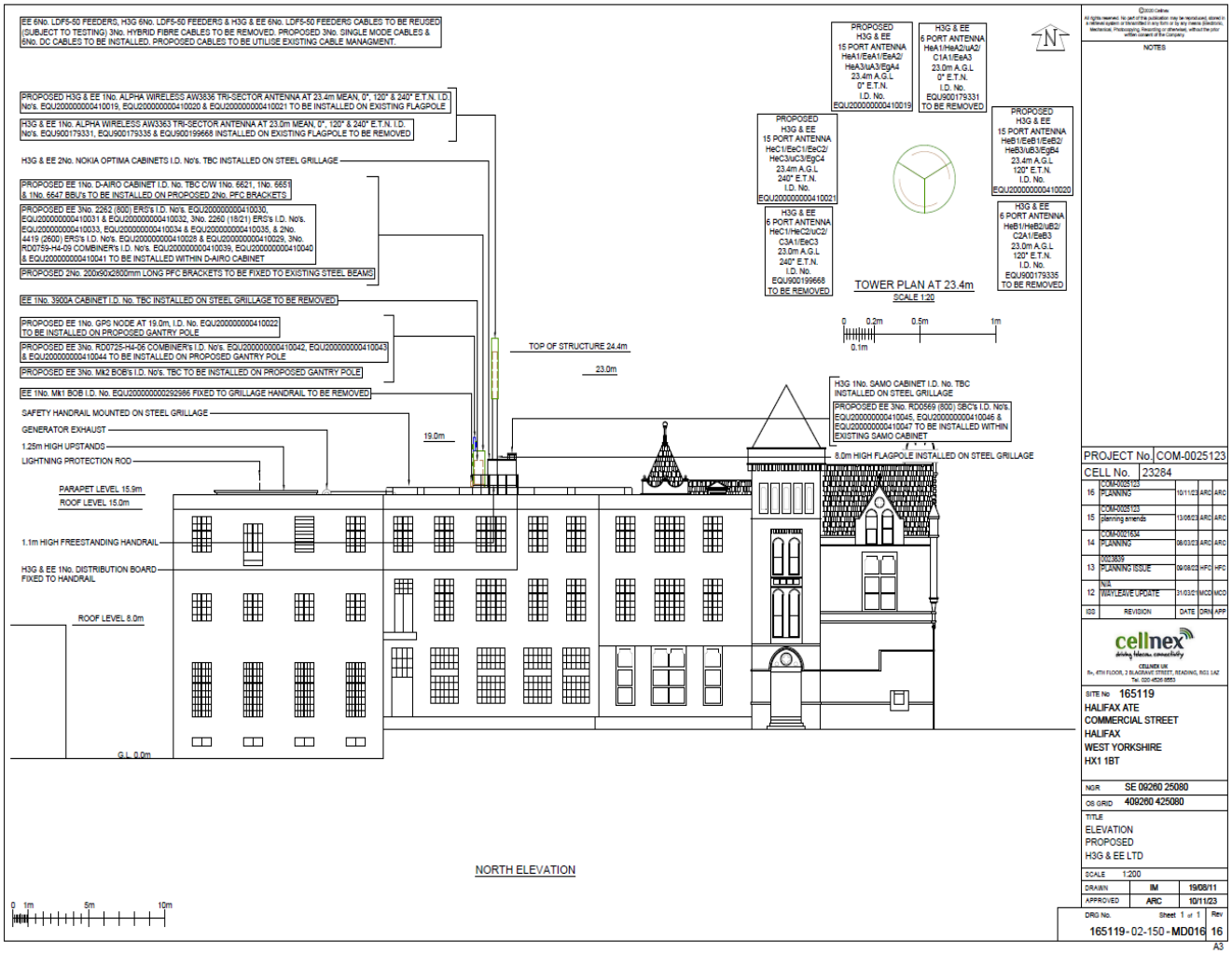
Figure 3.1 Extract of from 165119-02-150- MD016 (Planning Drawings) showing the proposed elevation.



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 Paragraphs 16 & 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.

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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 UK.

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4. PRIOR ENGAGEMENT

4.1 The recently revised National Planning Policy Framework (NPPF) and the Code of Practice for Wireless 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 Amber when assessed against the traffic light rating model as referenced in the Code of Practice.

4.2 The proposed works were given a Traffic Light Rating of Amber due to the historic value of the listed buildings and conservation area in which the existing telecommunications site is within vicinity. Although the proposed upgrades are modest it has been given an amber rating as a precautionary measure.

4.3 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.

4.4 The Pre-application engagement started on the 6th December 2023 for a 14-day consultation period however, regrettably we have not received any response from your authority and accordingly we would be pleased to address any necessary matters within the determination period of the application. The pre-consultation comprised of the drawings of upgrades, and a letter describing the proposed works.

The Pre-consultation engagement was sent to the following:

- Calderdale Metropolitan Borough Council Planning Department
- GCSE School
- Shining Stars Day Nursery
- Tiny Tree Nursery & Out of School Club Halifax
- M&S Nurseries
- Waterloo House Private Day Nursery Ltd

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- Ward Councillors for Town Ward:
  - Councillor Megan Swift
  - Councillor Joseph Thompason
  - Councillor Tim Swift

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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;
- Heritage statement
- The Code of Practice for 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'***.

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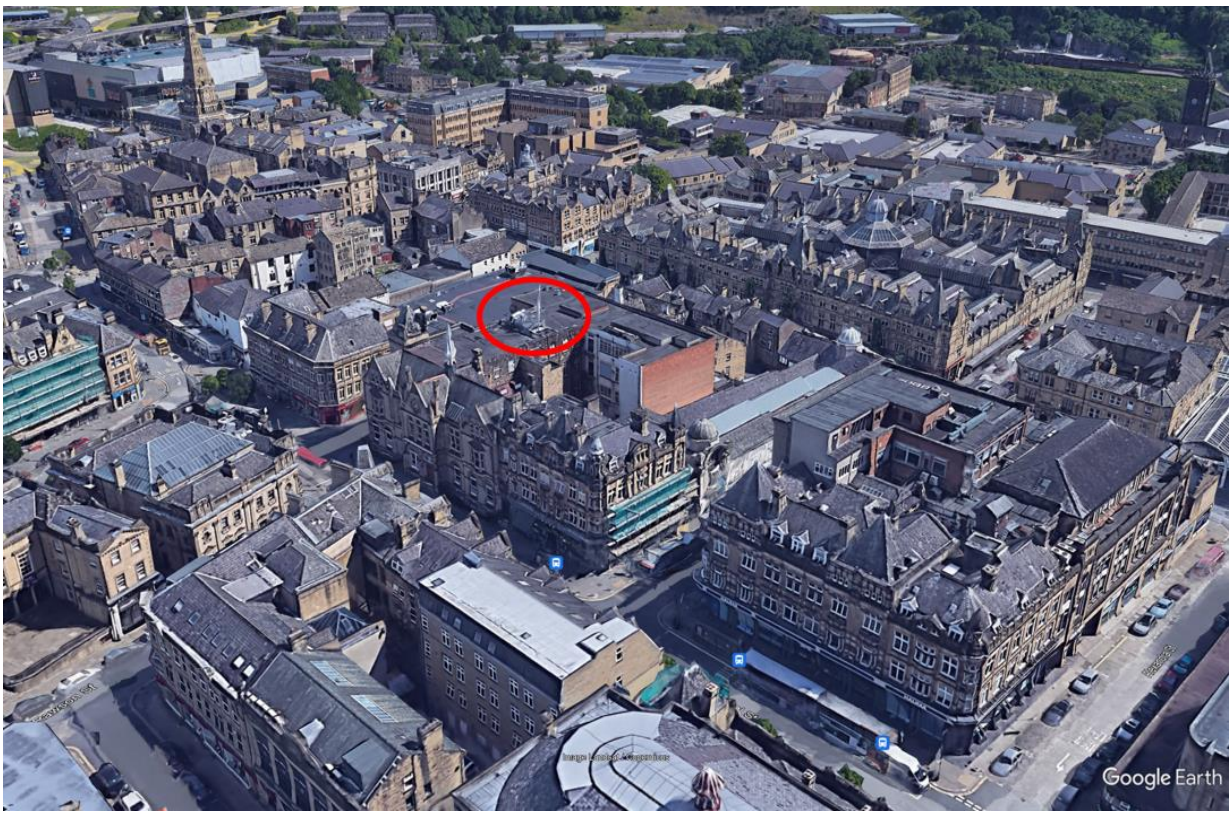
The Need to Conserve the Historic Environment

5.4 In this case the site falls within the Halifax Town Centre Conservation Area and within close proximity to the below listed buildings as shown in Figure 2.1 and 2.2. As such we provide a Heritage Statement in support.

Figure 5.1 – Extract from Google Earth of the existing telecommunications site in relation to the surrounding area



Heritage Statement

5.5 Understanding the importance of heritage within the Halifax area is important to our client and hence we have included a section within the planning statement to discuss any potential impact the proposed works would have on the mentioned conservation area and the below listed buildings:

- BOROUGH MARKET WITH SHOPPING ARCADE TO NORTH (1281516)
- OLD COCK HOTEL (1254004)

- ARCADE ROYALE (1380067)
- POST OFFICE CHAMBERS AND ARCADE ROYALE WEST ENTRANCE (1380068)
- HEAD POST OFFICE (1415426)
- LLOYDS BANK (1243601)
- SOMERSET HOUSE (1133901)

It is considered that the very minor development subject to this application, and described and illustrated herein, will have no detrimental impact upon the character, setting and fabric of the listed buildings and conservation area, given the existing base station is an established part of the Halifax . As shown in Figure 5.1 the existing rooftop site benefits from a significant height and therefore, would not be visible from ground level. Additionally, there are no other buildings that exceed the telephone exchange in height and due to the modest works proposed this is expected to have an almost non-existent visual impact.

5.6 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 the Conservation Area / World Heritage site, is balanced by the need to conserve or enhance their heritage qualities.

5.7 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.

5.8 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 UK. This policy objective is backed with the statutory obligation placed upon operators to share apparatus, where practicable out under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.

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5.9 In this instance, the installation of apparatus at this existing site owned or managed by Cellnex UK, where there are existing operations aligns with this longstanding policy.

5.10 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 UK 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.

5.11 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.

5.12 As a matter of principle, the development proposed is in accordance with the relevant policy framework and should be 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.

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Local Policy Considerations

5.22 At local level, the proposal has been considered against Calderdale Local Plan 2018/19 – 2032/33 – Written Statement (Adopted March 2023).

POLICY IM6

Telecommunications And Broadband

The policy does not establish any quantum or spatial distribution of telecommunications development across the borough. any telecommunications development proposals coming forward will be appropriately assessed and consider the following matters:

A. *The siting and design of the equipment will not cause unacceptable harm to the character or appearance of the area (including considerations relating to the south Pennine Moors Spa and SAC) or building on which it is located and will not have an unacceptable effect on the amenity of adjoining residential areas;*
   The special character and appearance of all heritage assets are preserved or enhanced;
B. *the quality or special interest of any environmentally sensitive areas (including considerations relating to the South Pennine Moors, SPA and SAC) are not detrimentally or adversely affected;*
C. *it can be demonstrated that the equipment will meet the international commission on non-ionising radiation protection (ICNIRP) guidelines on the limitation of exposure of the general public to electromagnetic fields;*
D. *it has been demonstrated that mast or site sharing is not feasible and that the equipment cannot be sited on an existing building or other appropriate structure that would provide a preferable environmental solution;*
E. *Consideration has been given to the future demands of network development, including that of other operators.*

it is believed that the proposed works adheres to all of the above sections outlined in policy IM6– especially section A and D which seeks to minimise the need for additional masts. as the proposed planning application is for a series of modest telecommunication upgrades this will reduce the proliferation of masts in the Halifax area. It should be noted that the application submitted is accompanied by a valid ICNIRP certification therefore adhering to section C.

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Policy HE1

Historic Environment

Development proposals should conserve, and where appropriate, enhance, the historic environment especially those elements which make a particularly important contribution to the identity, sense of place and local distinctiveness of Calderdale…

A. *Development proposals will be expected to conserve heritage assets in a manner appropriate to their significance. Harm to a designated heritage asset (or a Class II archaeological site) will only be permitted where this is outweighed by the public benefits of the proposal. Substantial harm to or the total loss of the significance of the most important designated heritage assets will only be permitted in wholly exceptional circumstances where there is a clearly defined significant public benefit which outweighs the harm.*
B. *Development proposals will be expected to conserve heritage assets in a manner appropriate to their significance. Harm to a designated heritage asset (or a Class II archaeological site) will only be permitted where this is outweighed by the public benefits of the proposal. Substantial harm to or the total loss of the significance of the most important designated heritage assets will only be permitted in wholly exceptional circumstances where there is a clearly defined significant public benefit which outweighs the harm.*

It is understood the significant importance of heritage assets to the Halifax area and as outlined in the previous sections 5.4-5.9 the site is within vicinity to 6 scheduled monuments. However, again it should be noted that the proposed works involve modest upgrades and therefore, should have an almost non-existent visual impact. As the proposed works are on an existing rooftop site without any structural changes this will help to preserve the historic value to the local community whilst offering significantly better connectivity for present and future mobile services.

5.23 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.

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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 proposed upgrade site has been carefully selected in a position capable of providing the required new upgraded essential coverage within the commercial setting of a large BT Exchange whilst minimising visual intrusion within the target coverage area. The scale of the upgraded equipment will be extremely minor in comparison to the overall bulk of the host building and the equipment has been positioned on the existing roof where the existing equipment is currently in-situ, to minimise the visual effects. The visual effects have been further mitigated by positioning the ancillary equipment cabinets out of sight towards the central area of the flat roof.

6.3 The visual envelope of the existing and upgraded equipment will be extremely small due to the screening effects associated with the high density of 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 view of residential receptors.

- **Kept in proportion to the Existing Apparatus and Exchange Building**

  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 and closer to the edge of the rooftop to meet the especial technical and operational requirements

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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 or look out of place within the heritage area.

- **Respect architectural style**

  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, although within the heritage asset, 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. 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 and now common within urban environments including those that may be designated for their heritage interest.

- **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 Halifax City Centre 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.

- **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.

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Access Considerations

6.4 Vehicular access to the site will be provided from the existing entrance to the telephone exchange on Commercial Street. Thereafter, access will be provided from the established internal routes to roof level. These existing routes do not require any amendment as part of the development proposed

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

6.6 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Landscaping

6.7 The proposed siting of the development has been very carefully chosen to minimise environmental impact. Any potential impact of the development is principally associated with radio mast, which is the most visible component of the base station, and which cannot be fully screened for operational reasons. The height of the apparatus on an existing rooftop means that any attempt to screen it in its entirety would be unrealistic in any event.

Appearance

6.8 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.

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7. HEALTH AND SAFETY

7.1 In support of the application, we include a separate document called ***'5G Health and Safety'*** which sets out in more detail the associated health and safety considerations. Every installation on a site owned or managed by Cellnex UK will be compliant with international standards adopted by the UK Government. A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.

7.2 The ICNIRP guidelines seek to protect against the well-known thermal effects of radio emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.

7.3 National planning policy remains clear, provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines through the refusal of planning permission.

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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 UK.
- Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
- Engagement in accordance with the Code of Practice procedures.
- An examination of design options to try and minimise potential visual impact.

8.6 Since the application site falls within vicinity to seven listed buildings and the Halifax City Centre Conservation Area this has been a key consideration and treated with high concern. However, it should be re-emphasised that due to the moderate upgrades proposed this will have an almost non-existent visual impact upon the surrounding area.

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8.7 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.

8.8 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.