

Town Planning Statement

Upgrade of Electronic Communications Base Station

At the Existing Cellnex UK Site

**Rooftop of the Linfern Telephone Exchange Building,
Linfern Road, Glasgow, G12 9ND
(NGR: E 256150, N 667450)**

Site Reference 164920

CELLNEX UK AND CORNERSTONE

Cellnex UK

January 2024

1. INTRODUCTION

- 1.1 This statement is submitted in support of an application for prior approval for a mobile base station upgrade for the mobile network operators (MNOs) Vodafone Ltd and Telefónica UK Ltd, in conjunction with Cornerstone. 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 consists of a three-storey flat roofed telephone exchange building located on the north side of Linfern Road, Hyndland. The site is located in an established residential area in the Glasgow West Conservation Area within ward 23 - Partick East/ Kelvindale.
- 2.2 The proposal is for the upgrading of an existing rooftop telecommunications site at the Linfern Automatic Telephone Exchange (ATE). The largely utilitarian building is a three-storey modern BT Exchange of approximately 14.2m in height to the main flat roof level and 17.6m in height to the top of the plant room. The purpose of the upgrade is to facilitate the provision of essential new and improved coverage and service provisions. The site is situated within a high-density residential 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 base station within the Conservation Area. It is important to note that in addition to being the sequentially preferable solution, the upgrading of an existing rooftop site (on an unlisted building of no special character) will fit in within the existing network configuration thereby eliminating the need to introduce additional base stations within the cell search area.
- 2.3 The streets surrounding the exchange are lined with dense trees and foliage that provide privacy to the apartments and detached dwellings stepped back from the road. As such, the proposed upgrade site is housed on the rooftop of a large telephone exchange building but views towards the equipment are extremely well-screened at ground level by surrounding mature tree planting along both sides of Linfern Road and Sydenham Road. Whilst it is acknowledged that there are residential properties within the vicinity of the telephone exchange, there are also commercial properties 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.
- 2.4 The sharing of base stations between multiple operators is one of the key strategic policy principles contained within Scottish Government Guidance. In keeping with the National Planning Framework (NPF) guidelines of using high quality communications infrastructure 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 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 the upgrade. Although it is accepted that there will be a very marginal 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 improved connectivity.
- 2.7 Within this context, the local planning authority has granted planning permission for various electronic communications apparatus on the Linfern Telephone exchange rooftop such as (most recently):
- 21/03053/FUL | Installation of telecommunications equipment upgrade and associated works | 2 Linfern Road Glasgow G12 9ND
 - 21/00266/FUL | Installation of telecommunication additions to existing base station | 2 Linfern Road Glasgow G12 9ND
 - 20/01429/FUL | Installation of telecommunication additions to existing base station | 2 Linfern Road Glasgow G12 9ND
 - 19/03282/FUL | Upgrade of rooftop telecom equipment. | 2 Linfern Road Glasgow G12 9ND
 - 18/00506/FUL | Replacement of three telecommunication antenna on the roof and ancillary works | 2 Linfern Road Glasgow G12 9ND
 - 15/00043/DC | Removal of 6 existing antennas and installation of 9 antennas and 2 transmission dishes onto existing support poles on roof of building | 2 Linfern Road Glasgow G12 9ND

3. THE PROPOSAL

- 3.1 The development proposed is shown in detail in the drawings submitted and is for the upgrade of an existing rooftop communications base station. The principal elements of the proposed development at the application site reflect various siting and design factors within the technical support document. The operators have a requirement to upgrade the existing rooftop base station to improve mobile connectivity by replacing apparatus which will entail:

The installation of 12no. antennas, replacing the 9no. existing antennas set to be removed, the installation of an additional 2no. transmission dishes, 1no. GPS module, and ancillary radio apparatus. As part of the required upgrade works 2no. existing equipment cabinets on the rooftop are set to be removed. The enclosed drawings provide further details of the siting and the design of the development.

- 3.2 Annex B of the Scottish Government Planning Guidance: Digital Telecommunications (December 2023) broadly explains how mobile networks operate. In the annual network rollout information supplied, the operators will have explained their network requirements for advanced mobile connectivity and the anticipated use of existing sites, including those owned by radio site infrastructure providers like Cellnex UK.
- 3.4 The application site has been selected by the operators as this will provide the required level of improve 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.
- 3.5 The use of the BT exchange building on Linfern Road to provide mobile coverage clearly reflects the operational nature of the site and as explained at paragraph 4.34 of the Scottish Government Planning Guidance: Digital Telecommunications (December 2023), “less visually sensitive areas where the use of standard equipment may be more readily acceptable could include.....telephone exchanges”.

4. PRIOR ENGAGEMENT

- 4.1 Industry best practice and also paragraph 3.5 of the Scottish Government Planning Guidance: Digital Telecommunications (December 2023) encourage engagement 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 In our engagement letter issued on 19th December 2023 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.
- 4.3 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.
- 4.4 Our best practice engagement with the local community entailed sending letters and draft drawings to the four local Ward Councillors for Patrick East/ Kelvindale – Blair Anderson, Jill.Brown, Lilith Johnstone and Kenny McLean; Dowanhill, Hyndland and Kelvinside Community Council; the Head Teacher of Notre Dame High School Ms Rosemary Martin; and to Eamont Lodge Court Retirement Home. To date no formal responses have been received from any of those consulted.

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);
- Glasgow West Conservation Area Character Appraisal
- Scottish Government Planning Guidance: Digital Telecommunications - December 2023 (replaced 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 advanced mobile connectivity, 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 Advanced, modern mobile connectivity will help underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. To deliver improvements to existing services and supporting future mobile technologies, it is essential that the planning system looks to support and facilitate new

base station installations and upgrade existing base stations such as that proposed to meet the Government's Digital Strategy.

The Need to Protect the Historic Environment

- 5.5 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. Scottish Government Planning Guidance: Digital Telecommunications (December 2023) at paragraph 3.3 also says that where making decisions, local planning authorities must "*understand the technical, operational and topographical constraints of delivering fixed and wireless communication infrastructure, services and networks*".
- 5.6 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.
- 5.7 In this instance the installation of apparatus onto the rooftop of this existing operational site owned / managed by Cellnex UK, where there are existing operations aligned with longstanding policy.
- 5.8 Whilst the building itself is not listed, the application site falls within Glasgow West Conservation Area Conservation Area. 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.
- 5.9 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 technologies necessitate siting of a new apparatus within the Conservation Area;
- The upgrade of the existing 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.
- The use of the rooftop of the BT Telephone Exchange building aligns with paragraph 4.34 of the Scottish Government Planning Guidance: Digital Telecommunications, which recognises that *“less visually sensitive areas where the use of standard equipment may be more readily acceptable could include... telephone exchanges”*.

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

5.11 At local level, the proposal has been considered against the relevant policies within the Glasgow City Development Plan (Adopted 2017).

Glasgow City Development Plan 2017 - IPG3 Economic Development – Interim Planning Guidance (February 2017) Section 8 Telecommunications states:-

The Council recognises the importance of new telecommunications infrastructure as part of meeting economic development objectives and maintaining the city's competitiveness. Delivery of high-speed broadband, telecommunications and digital infrastructure which can enhance the competitiveness and operation of local economic enterprises and businesses will be supported. At the same time, it is also recognised that certain types of telecommunications infrastructure, such as antennas and mobile phone masts, can have significant visual impacts.

The Council will support proposals for new telecommunications infrastructure, where:

- i. they accord with Placemaking and Sustainable Spatial Strategy policy aims and objectives;
- ii. high-speed broadband is provided, especially where this is delivered via discrete underground cabling;
- iii. the site proposed has been identified and justified as the most appropriate solution following a search for alternative locations and options, including sharing or co-location of sites. Reasons for rejecting sites should be submitted as evidence;
- iv. visual impact is minimised through careful and sensitive design and siting;
- v. it is demonstrated that cumulative impact has been considered and limited;
- vi. careful landscaping or screening can be incorporated into the proposal, where appropriate.

GROUND-BASED MASTS

Applications for ground-based masts should be accompanied by:

- details of the site search for an alternative site and the reasons why each location was unacceptable; and
- a coverage plot indicating the extent of the coverage gap.

The application may be refused if no such details are received, or if there is no satisfactory reason for not using an existing building or mast. Masts should preferably be located where any adverse effect on visual amenity is less likely to be problematic.

Operators are encouraged to use innovative designs within woodland. Within historic areas, apparatus should be incorporated within lighting columns and other street furniture, or within custom designed monopoles.

In general, proposals should not result in a situation where:

- the erection of a mast and cabins would be detrimental to pedestrian or traffic safety;

- a pavement monopole would be close to another monopole, lighting column or traffic light column, resulting in clutter and visual dis-amenity; or
- a monopole with an overly large head casing, or attached dish/drum, would be located in an area of high visibility, or overlooked by housing.

Within residential areas, masts should:

- be monopoles;
- be located to blend in with existing street furniture by matching the alignment, height, colour and width of nearby lighting columns;
- be located midway between lighting columns, or other tall items of street furniture, to preserve visual amenity;
- not be located beneath the crown of trees, where construction of the masts and cabins will result in root and branch damage; and
- have equipment cabins finished in colours to match their background.

SITE SHARING

- Wherever possible, operators are encouraged to share masts, or sites such as rooftops. Mast sharing, however, can often lead to an increase in height and bulk of the mast, making it much more visibly intrusive. Mast sharing is unlikely to be acceptable within residential areas or adjacent to residential properties.

Policy CDP 1 Placemaking (supported by Supplementary Guidance Policy SG1 Placemaking) states:

In order to be successful, new development should aspire to achieve the six qualities of place as defined in draft Scottish Planning Policy and reinforced by Creating Places and Designing Streets.

- It is distinctive;
- It is safe and pleasant;
- It is easy to move around and beyond;
- It is welcoming;
- It is adaptable; and
- It is resource efficient. These qualities shall be further elaborated in Supplementary Guidance.

The Council will also expect new development to be design-led, to contribute towards making the City a better and healthier environment to live in and aspire towards the highest standards of design while protecting the City's heritage, by achieving the following:

1. Making the City an appealing place to live, work and visit;
2. Embedding community facilities and local shopping facilities in communities and recognising the needs of all members of society; (refer to Policy CDP4: Network of Centres);
3. Creating healthy and more equitable environments and promoting healthy lifestyle opportunities, including opportunities for communities to grow food;
4. Delivering sustainable buildings, areas and spaces that are attractive and enhance the quality of life for everyone;
5. Demonstrating efforts to responsively engage with all stakeholders;
6. Demonstrating a creative and iterative process in developing proposals;
7. Delivering highly creative, innovative, and technical standards in design of buildings, structures, infrastructures and their setting;
8. Respecting the historic and natural environment by responding to its qualities and character and encouraging their appropriate use;
9. Providing high quality amenity to existing and new residents in the City;
10. Promoting connectivity, active travel and public transport use rather than private car use;
11. Taking the opportunity to deliver an integrated approach to infrastructure delivery;
12. Bringing, where possible, vacant and derelict land back into effective use via both short term (e.g. Stalled Spaces) or long term solutions;
13. Ensuring new activity does not result in the deterioration of air quality particularly in, or adjacent to, Air Quality Management Areas;
14. Ensuring new activity does not introduce unacceptable additional noise particularly in, or adjacent to, Noise Management Areas nor have an adverse effect on Quiet Areas; and
15. Assessing major developments using the Glasgow Healthy Sustainable Neighbourhood Model and demonstrating healthy outcomes have been considered (via application forms).

The level of detail and design tools required to deliver on Policy CDP 1: The Placemaking Principle will be considered in the context of the size of development and the relationship to delivering on Policy CDP 2: Sustainable Spatial Strategy.

The Supplementary Guidance that supports this policy, as outlined in Table 1 will provide details on how development proposals shall be assessed in terms of meeting The Placemaking Principle.

- 5.12 In accordance with the requirements set out in Policy CDP 1 and IPG3 Section 8 relating to minimising any adverse impact on the visual amenity, character or appearance of the surrounding area, the proposal is for a sensitively designed upgrade of an existing shared rooftop installation. The site has been carefully selected in an extremely well screened position capable of providing the required essential coverage to a high-density residential area whilst being situated as far away as technically possible from the views of residential properties.
- 5.13 In accordance with Policy CDP1 the proposed upgraded installation will 'promote connectivity' whilst seeking to provide the 'opportunity to deliver an integrated approach to infrastructure delivery'. This development would result in negligible harm to amenity and the public benefits would certainly outweigh the perceived harm to amenity.
- 5.14 In line with the policy requirements detailed above 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. The visual effects of the proposed upgrade will be minor with the upgraded antennas being installed in a similar position to the existing with a marginal increase in bulk and intensity. The upgrading of the existing installation will be a considerably less visually intrusive coverage solution than introducing a new separate ground based or rooftop base station within the target coverage area. In accordance with Policy IPG3 Economic Development Section 8's requirements to mitigate adverse visual effects, the height of the upgraded antennas has been kept down to the absolute minimum capable of providing the required coverage. The BT Exchange rooftop is already home to various existing utilitarian structures including safety barriers, roof access ladders, raised steel steps over gaps and a plant room all of which will help the proposed upgraded equipment to merge with its surroundings.
- 5.15 The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operators and minimising environmental impact. It is also worth noting that there is an extensive planning history of approved applications for similar upgrade proposals at this site, the most recent of which was determined in December 2021.

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 a new 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 and dishes, are dictated by technical and operational considerations related to the need to provide an acceptable level of mobile coverage to the local area.

Physical Context

- 6.4 The proposed upgrade site has been carefully selected in a position capable of providing the required new essential upgrades for mobile coverage within the commercial setting of a large BT Exchange rooftop whilst minimising visual intrusion within the target coverage area. The site benefits from the screening effects associated with mature tree planting defining the local road and property boundaries. The upgraded equipment will be of extremely small scale in comparison to the overall bulk of the host building and although the proposed upgrade will require a marginal increase in bulk of the associated antenna apparatus the visual effects will be minor. The height of the equipment has been kept down to the absolute minimum capable of providing the required coverage and there will be no visible changes to any of the ancillary equipment enclosures. 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.

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, already referred to above.

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 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 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 the Scottish Government Planning Guidance: Digital Telecommunications 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 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

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 4.28 of the Scottish Government Planning Guidance: Digital Telecommunications further outlines the specific aims in relation to installing apparatus on a building and these are addressed accordingly:

- **Be coloured to correspond with the background or to reduce contrast**

The antennas can be painted as desired. If you consider alternative colours to be appropriate please let us know.

- **Keep 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 no higher than what is currently in place. 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. 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 as far as practicable**

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.

- **Minimise impacts on important views and 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 creating excessive 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.

- **Minimise fixings and other physical impacts on the building fabric**

The apparatus has been limited to what is operationally necessary and utilising, where possible, existing fixings to minimise direct disturbance with the actual fabric of the building / structure itself

- **Use clean lines and maintain symmetry**

Apparatus will be grouped and mounted as reasonably practical given operational and technical constraints and in a manner that best attempts to ensure visual balance and apparatus proportionate to the host building / structure

Antenna Array

- The numbers of antennas and dishes and their size has been kept to the minimum necessary to provide the required 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.

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

- 6.9 Access to the site will be provided from the existing BT Exchange rooftop entry points.
- 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.
- 6.13 The height of the replacement and upgraded antennas has been kept down to the absolute minimum capable of providing the required coverage to mitigate the impact on views from public vantage points nearby. For these reasons, additional landscaping is not considered necessary or appropriate and has not been included within the scheme.

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 In support of the application, we include 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 the upgrade of an existing electronic communications base station necessary to improve a vital network that provides public services.
- 8.2. The service provided by the operator is in the public interest and is in very high demand. In the UK there are now more than 111 million subscriptions to mobile networks and mobile services now exceed fixed landlines in terms of customer numbers and usage.
- 8.3. The public interest of the system is clear from the considerable benefits that will flow and it makes a significant and major contribution towards sustainable objectives.
- 8.4. The operator's requirement is in the context of network needs associated with an advanced, modern cellular system. 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.