



## **Town Planning Statement**

### **5G Electronic Communications Base Station**

#### **At BT Telephone Exchange**

**Baillieston ATE, Maxwell Road, Baillieston, Glasgow, G69 6HW.**

**Site Reference: COM-0014714**

**Cornerstone**

**Cellnex UK**

***March 2024***

## 1. INTRODUCTION

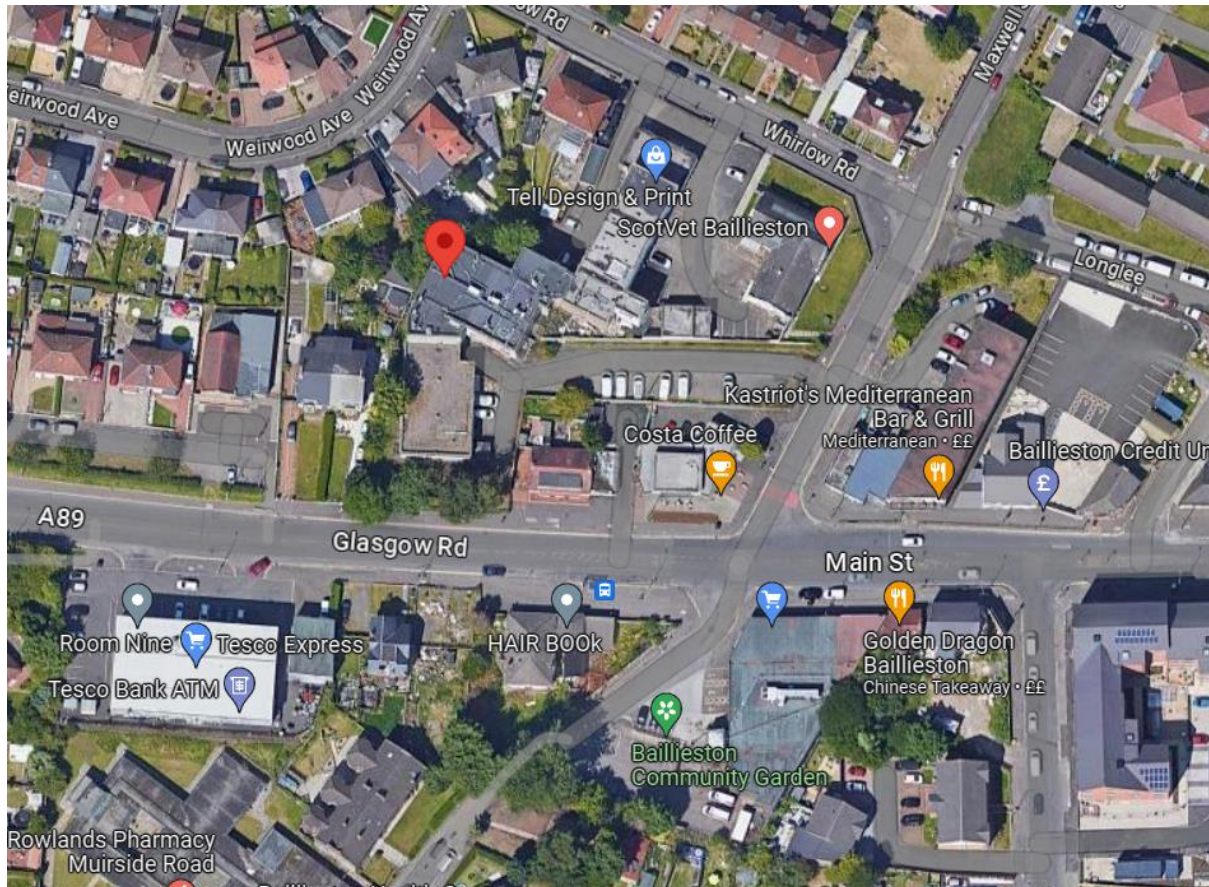
- 1.1 This statement is made in support of a planning application for a 5G upgrade to a mobile base station for the mobile network operators (MNOs) Vodafone Ltd and Virgin Media O2 Ltd, in conjunction with Cornerstone. The application site is operated by Cellnex UK, a radio site infrastructure provider.
- 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 are 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 existing telecommunication site is in Baillieston, a primarily residential area. However, the site is situated in close proximity to commercial establishments, including Tell Design and Print, Costa Coffee, Tesco Express, and several restaurants. This can be seen in Figure 1. Baillieston ATE is adjacent to the A89, that goes directly into Glasgow city centre. The Telephone Exchange is a two-storeyed structure, enabling the apparatus to be at an optimum height. The site is surrounded by similar buildings between one to three storeys high and the local area does not benefit from any taller structures. No heritage issues, such as conservation areas and listed structures were found within vicinity of site.

The current location is positioned away from the nearby roads. When looking at the site from Glasgow Road, the trees next to the building's southern side offer some visual screening. Views of Maxwell Street from the east limit the view of the stub-mast. To the north-west, Whirlow Road and Weirwood Avenue provide sporadic views of the top half of the mast. However, owing to the scale of apparatus and views being transitional & localised, the impact is not substantial. The stub-mast would be partially visible from a few properties to the north-west. To the northwest of the structure, there are a few trees, which lessen the impact of apparatus and mitigate the limited adverse visual impact on residential properties. These aspects have been discussed further in this statement in context of proposed apparatus.

Figure 1 – An image to show the surrounding area around the existing telecommunication site (indicated by the red marker). Extract taken from Google Images.



2.2 Whilst, this is a rooftop upgrade to an existing telecommunications installation, the site is surrounded with buildings or similar height and appearance, which minimise the visibility of the telecom proposal. However, whilst the site is adjacent to residential buildings to the west, we believe these will not be impacted, as the proposal will have no more material effect on them than the existing apparatus on the telephone exchange. The site is accessed through existing means via the building the rooftop is located on.

2.3 There has been previous planning history, that shows approval of upgrades at this existing telecommunication site. Application reference 21/01401/FUL, was granted permission subject to conditions in June 2021. Application reference 06/03092/DC, for the installation of 2 antennas in mock chimney flues and one pole mounted antenna was granted permission in 2006.

The Town and Country Planning (General Permitted Development and Use Classes) (Scotland) Amendment Order 2020 came into force on 1st April, which further widens the permitted development rights provided to certain telecommunications development. This is a reflection of government's vision to improve digital connectivity in Scotland. The Scottish Planning Policy supports the need for mobile networks to evolve and deliver advanced, digital connectivity across Scotland. This has been discussed further in detail in this report and should be considered in the determination of this application.

### 3. THE PROPOSAL

- 3.1 The development proposed is shown in detail in the drawings submitted and is for an extension to an existing electronic communications base station, to provide 5G to the local area of Baillieston. The deployment of 5G services is a development of the MNOs existing 3G and 4G networks apparatus at the existing base station. The utilisation of an existing base station is critical to this situation as it reduces the proliferation of masts in the area while delivering the most current and effective coverage. 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 significant technical and operational requirements and this has implications on the amount, height, position and design of the upgraded base station apparatus on the rooftop of the building. To help explain this important detail, we have set this out in the accompanying “5G Technical Support’ document, which must be read in conjunction with this planning statement.
- 3.3 The principal elements of the proposed development at the application site reflect these various siting and design factors within the technical support document:
- ***The installation of new 7m Stub tower.***
  - ***The removal of 6No. Antennas at 15m.***
  - ***The installation of 6No. Antennas at 19.4m.***
  - ***The installation of 3No. Antennas at 20.05m.***
  - ***The installation of 3No Antennas at 18.75m.***
  - ***The installation of 2No. GPS Antennas.***
  - ***The installation of 3No. 0.3m Dishes***
  - ***The installation of 30No. RRUs and 3No. Diplexers.***

- 3.3 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.
- 3.4 PAN 62 has just been replaced by the Scottish Government Planning Guidance: Digital Telecommunications. broadly explain how mobile networks operate. The document recognises the importance of the land use planning system in delivering digital and telecommunications infrastructure across Scotland. 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.
- 3.5 The application site has been selected by the operators 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. The policies are discussed in more detail in the statement.

#### 4. PRIOR ENGAGEMENT

- 4.1 Industry best practice and Effective Community Engagement in Local Development Planning Guidance 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 score when assessed against the industry traffic light rating model. The industry has adopted a traffic light model system. It allows a proposal to be rated according to its likely sensitivity in terms of environmental, planning and community considerations. The ratings include Green, Red and Amber. Therefore, a rating of Amber can be deemed as sufficient in the elements stated previously, reflecting the engagement made with the local planning authority, local councillors and local school in the area.
- 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.
- 4.5 Our best practice engagement with the local community entailed, a site detail sheet, a letter, and drawings. The pre consultation was engaged with local councillors of the area: Councillor Alex Kerr, Councillor John Daly, Councillor Kevin Lalley and local schools within 500m proximity: Garrowhill Primary School, Happitots Nursery Garrowhill, St. Bridget's Primary School, Bannerman High School. Consequently, because there were no responses received, we can assume that no concern was raised from the proposed development, supporting the amber rating.
- 4.6 We have not received any response from the engagement made but we would be pleased to address any necessary matters within the determination period of the 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); City Development Plan and Clyde Plan 2017
- Scottish Planning Policy June 2014
- 

5.2 Scottish Government Planning Guidance – Digital Telecommunications Dec 2023  
From these documents it 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. The below principal themes demonstrate that the application accords with them and illustrate we are aware of the relevant planning policies.

### National Support for Modern Communications

5.3 There is significant 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. 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 Our accompanying document of national policy ‘**National Policy – Delivering Ultra-Fast Broadband Mobile Connectivity**’ sets out how 5G 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 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**'.

Page 16 of the NPF4 on National Spatial Strategy advises that 'digital connectivity will also be critical' to 'rural revitalisation.' Policy 24 of the NPF4 is clear that digital infrastructure will support investment and population growth in rural areas. The NPF4 goes on to advised that local planning policy should support the delivery of mobile connectivity, particularly gaps in connectivity and barriers to digital access, which are often more acute in rural areas. We also explain in our support document(s) '*5G - Smart Cities*', '*Connected Vehicles and 5G "ecosystem"*' and '*5G - Benefits for Health and Emergency Services*' the particular benefits of 5G and how it will help support sustainable urban communities, innovation, efficiencies and productivity.

### **Balancing operational and environmental considerations**

- 5.5 The special operational and technical factors that require specific siting of a 5G base station should be balanced by the need to minimise environmental and visual impact.
  
- 5.6 The longstanding policy to minimise the potential environmental impacts associated with electronic communications development include the requirement to avoid the unnecessary proliferation of new radio masts and sites. This policy objective is backed with the statutory obligation for 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 the expansion of existing networks is, therefore, to use existing electronic communications sites owned by other operators or radio site infrastructure providers, such as Cellnex UK. In addition, the possibility of using other high structures is also looked at. Importantly, we are using an existing site and site sharing here instead of an installing a new mast. Demonstrably, this complies with the local plan and national plan, enabling more efficient coverage from an existing location.

5.7 In this instance the installation of apparatus onto the rooftop of this existing site owned or managed by Cellnex UK, where there are existing operations aligns with longstanding policy. Indeed, paragraph (e)(ii) of Policy 24 of the NPF4 states that when erecting antennas (for a base station), then the sharing an existing operational rooftop of a building, such as that operated by Cellnex UK, should be first explored. Within this context the installation will be seen as an acceptable and justified use, reflecting all of the considerations within Policy 24 of the NPF4:

- The 5G base station is required as part of a national mobile communications network, necessary to extend and improve mobile connectivity to the local area;
- The target coverage area has been explained and consequently the special operational and technical requirements of 5G necessitate siting of a new apparatus within it;
- 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.

5.8 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 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 relevant policies from the adopted City Development Plan and Clyde Plan. There have been references made to the need for robust digital connectivity in some sections of the development plan.

The CDP reiterates the four planning outcomes mentioned in the Clyde Plan – second

Strategic Development Plan for the Glasgow and Clyde Valley area. Under the section: Strategic Approach, The CDP sets out a strategy, to achieve the key aims of the Plan, by delivering on four strategic outcomes, one of which is:

‘...We want to achieve a City that is a place where it is easy to move around with active travel and public transport given priority and a place where investors, businesses and residents have good access to physical and digital infrastructure...’

‘...Digital Connectivity Support the development of digital connections to allow mobile working and local business to flourish...’

This strategic outcome is reflected in Policy CDP 3 Economic Development.

‘... The Plan will support development proposals that...’

‘... 5. Support and improve the City’s energy, transport and digital infrastructure...’

Within the City Development Plan 2017, IPG3 Economic Development Interim Planning Guidance, recognises the importance of telecommunications, stating:

#### “8 Telecommunications

*8.1 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.*

*8.2 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.*

*Note: New residential and industrial development should provide up-to-date telecommunications infrastructure.*

*8.3 The following provides further guidance for telecommunications infrastructure which is recognised to require careful siting given the potential requirement for visual impact assessment and/or mitigation:*

#### *A - APPARATUS ON EXISTING BUILDINGS OR STRUCTURES*

- Operators are encouraged to locate apparatus on existing buildings or structures, rather than erecting free-standing masts.*
- Apparatus should ideally be located within fake features such as a tank house or flagpole. If the equipment is too bulky or numerous, then apparatus should be located back from the edge of the roof to minimise its visual impact.*
- If a rooftop cannot take the loading of telecommunications equipment, permission may be granted for apparatus attached to, and viewed against, the top of the walls, on condition that the apparatus is coloured to match its background colour.”*

Given that an existing location is being used to deliver digital infrastructure, telecommunications, and high-speed broadband—all of which can boost Baillieston's competitiveness by bringing in 5G—it appears that our proposal complies with the local plan's goals.

Digital Glasgow Strategy launched at the end of 2018, sets out the 'our priorities and commitments to developing Glasgow's digital economy and transforming our public services through the use of digital technology'. They believe their vision is as follows: "A world class city with a thriving digital economy and community, where everyone can flourish and benefit from the best digital connectivity and skills, where technology is

used to improve everyone's quality of life, drive businesses' innovation and service design and improve our city, its neighbourhoods and its success”.

Glasgow City Council believes that investment in Glasgow's digital connectivity is almost entirely based on market dynamics within the telecommunications industry, and they are confident in Glasgow's telecommunication market. As a result, this upgrade enables the installation of 5G, increasing Glasgow's market and overall economic worth.

- 5.21 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 is categorised as a local development 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 consideration of the detail, 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 upgrade of an existing 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 existing apparatus and similar buildings in the vicinity of the site, mean that the visual impact of the proposed telecommunications equipment will be limited.

### 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 explained in detail in the '**5G Technical Support**' document.
- 6.6 For example, the number 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 5G 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 5G 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 Scottish Government Planning Guidance – Digital Telecommunications Dec 2023 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 reduced 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.

- 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 Scottish Government Planning Guidance – Digital Telecommunications Dec 2023 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 cabinets will be painted the same as the existing cabinets. 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 and stub tower are similar to the existing electronic communications apparatus installed on the building, although higher to reflect the technical requirements of 5G as explained in the '**5G Technical Support**' document. 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.

- **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.



## Access Considerations

- 6.9 Access to the site will be provided through existing routes, in line with the previous approved applications.
- 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.

## Appearance

- 6.12 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 minimise imposing 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. Furthermore, as this is an existing rooftop telecommunication site, the appearance is minimal due to the marginal works that aligns with the original site.

## 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.

## 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. The proposed works seen below are to deliver improved service for the local area of Baillieston:

- ***The installation of new 7m Stub tower.***
- ***The removal of 6No. Antennas at 15m.***
- ***The installation of 6No. Antennas at 19.4m.***
- ***The installation of 3No. Antennas at 20.05m.***
- ***The installation of 3No Antennas at 18.75m.***
- ***The installation of 2No. GPS Antennas.***
- ***The installation of 3No. 0.3m Dishes***
- ***The installation of 30No. RRUs and 3No. Diplexers.***
- ***The installation of associated ancillary equipment as shown on the attached drawings.***

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 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 in providing the 5G system is clear from the considerable benefits that will flow and it is expected to make 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 have particular locational and siting requirements which are more restrictive than previous network generations. 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 have 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 approval applies. We believe this proposed development to the existing installation located on an existing rooftop site is fully compliant with the local plan and urge the LPA to approve this telecommunication upgrade.