

Town Planning Statement

Electronic Communications Base Station

At the Existing Cellnex Site

**MANCHESTER DEVONSHIRE STREET NORTH
APEX HOUSE
2 DEVONSHIRE STREET NORTH
MANCHESTER
GREATER MANCHESTER
M12 6JQ**

**Site Reference: 168646
Project Reference: 238825**

CELLNEX / MBNL

December 2021

1. INTRODUCTION

- 1.1 This statement is submitted in support of an application for prior approval determination for the necessary electronic communications upgrades proposed at an existing mobile base station, for the relevant mobile network operator in conjunction with Mobile Broadband Network Ltd (MBNL). The application site is operated by Cellnex, a radio site infrastructure provider.
- 1.2 The application includes:
- A description of the site and surrounding area
 - A description of the proposal
 - A statement of community engagement
 - A review of planning policy considerations
 - A review of design and access considerations
- 1.3 A number of other accompanying documents have been submitted in support of the application and these are referred to and must be read in conjunction with this statement.

2. SITE AND SURROUNDING AREA

- 2.1 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 to the 2G, 3G, 4G and 5G network.
- 2.2 The applicant would also like to stress in today's current crises (COVID-19) it is imperative that communications are not only maintained but also improved to ensure capacity and real time data is at the forefront. Telecommunications is considered as a critical service as it is providing data to network operatives, field engineers, call centre staff, IT, and data infrastructure, 999 and 111 critical services. This installation will allow telecommunications infrastructure providers to assure quality, capacity, and operational performance so that customers have uninterrupted access to crucial mobile and broadband services, specifically at this critical time.
- 2.3 The application site is an existing telecommunication base station, located on the roof of Apex House, 2 Devonshire Street North, Manchester. The site sits south-east of Manchester City centre in the Ardwick Ward.
- 2.4 Immediately south of the building on which the base station is housed is a large Stagecoach factory with other office buildings and civic buildings to the north of the site and directly adjacent. To the west of the site along Hyde Road is The Arden School of Theatre and The Manchester College (Nicholls Campus) with Nicholls Community Football Centre directly behind them directly facing the building.
- 2.5 The existing rooftop base station is shared by multiple telecommunications operators for siting their telecoms apparatus. The rooftop is accessed via an internal staircase that leads to the plant room on the rooftop where the base station can be accessed via the plant room doors and fixed external ladders are used to reach the highest parts of the rooftop base station.
- 2.6 The existing base station can be seen in views from immediate vantage points however, considering that there are no sensitive land-uses in the immediate vicinity, the impact is very minimal in nature to the building and its surrounding landscape. The existing installation is currently failing to meet customer demand and as a result, the

Operator's license obligations for the area. The equipment requires the necessary upgrades to address this market failure. This is the reason for the application before you.



Figure 1: View of site from the Junction of Hyde Road and Devonshire Street North

3. THE DEVELOPMENT PROPOSAL

3.1 The development proposed is shown in detail in the drawings submitted and is for 2G, 3G, 4G and 5G equipment upgrades at the electronic communications base station on the rooftop of Apex House, 2 Devonshire Street North, Manchester.

3.2 The applicant considers it is important to explain the technical justification for the upgrade requirements and how this site fits into the overall network. The NPPF states at Paragraph 114:

'Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.'

3.3 Mobile connectivity is becoming ubiquitous, and the expectation is that it should be available throughout the country. From the first generation of analogue phones to modern 5G enabled smart phones, people have embraced the benefits provided by increased connectivity and the applications that smart phones can control. As digital systems and mobile telephony develop it has become apparent that the mere requirement to make a telephone call is secondary to the overall advantages and opportunities that modern smart phones and increased data speeds can offer.

3.4 It is anticipated that the next generation of smart phones will be only a small part of wider mobile connectivity. The first generation provided voice calls, the second generation allowed basic data such as texting and the third generation offered internet access and the development of apps. Since then, the smart phone has developed further, and the fourth generation has brought video and much faster data speeds allowing the integration of the smart phone into wider use.

3.5 Connected Nations 2018, states that in 2018, 82% of England's landmass received good 4G coverage from all four mobile operators. Voice services from all 4 operators covered 91% of England's landmass. Individual operator coverage for 4G was higher, at between 89% and 95% of England's landmass. 78% of homes and businesses had good indoor coverage from all 4 operators.

- 3.6 The benefits to commerce, industry and public in general are well recognised. The proposed upgraded installation will form as essential part of MBNL's network.
- 3.7 In a letter dated 07 March 2019 '**Collaborating for Digital Connectivity**', Ministers from the DCMS and MHLG wrote to the CEOs of all Local Planning Authorities in England asking them to support the investment necessary to make the United Kingdom world leader in 5G, with the majority of the population covered by 5G signal by 2027.
- 3.8 Included in support of this application is the document "**General Background Information for Telecommunications Development**" which explains the background to and requirement for upgraded 2G, 3G and 4G network services, which must be read in conjunction with this planning statement. Unlike earlier generations of mobile connectivity, 5G has more significant technical and operational requirements and this has been kept in mind when bringing forward the upgrade proposal. To help explain the important detail, we have further set this out in the accompanying "**5G Technical Support**" document.
- 3.9 The principal elements of the proposed development at the application site reflect these various siting and design factors within the technical support documentation.
- 3.10 The proposed developed consists of:

To be removed

- 1No. BTS Cabinet
- 1No. IMB Cabinet
- 1No. GPS Module
- Other Ancillary Apparatus

To be installed

- 1No. UHF GPS Module
- 3No. Air Antenna
- 5No. Existing Antennas to be raised
- 1No. AIRI Cabinet
- Replacement Support Poles and Steelwork
- All other ancillary apparatus

- 3.11 The proposed equipment upgrades, and support apparatus will be made from materials that are in keeping with those that already exist on the rooftop with the same palette of colours also being retained. The colour of the proposed apparatus is open

to change if the local planning authority request that the proposed is painted a specific colour to better integrate with its surroundings.

- 3.12 Section 6 of the Code of Best Practice on Mobile Network Development in England, published in November 2016, explains how mobile networks operate. In the annual network rollout information supplied, the operators will have explained their network requirements for high level 3G, 4G and 5G and the anticipated use of existing sites, including those owned by radio site infrastructure providers like Cellnex.
- 3.13 The application site will provide the required level of upgraded network coverage whilst properly meeting national town planning policy objectives for the shared use of existing electronic communication sites, in this case operated by Cellnex.

4. PRIOR ENGAGEMENT

- 4.1 The recently revised National Planning Policy Framework (NPPF) and the Code of Best Practice on Mobile Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received a categorisation of 'green' when assessed against the traffic light rating model (see Appendix B of the Code of Best Practice).
- 4.2 In our engagement letter and Consultation Strategy sent on the 22nd November 2021 via email, 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 proposed development.
- 4.3 Regrettably we have not received any further response from your authority and accordingly we would be pleased to address any necessary matters within the determination period of the application.
- 4.4 As part of our best practice engagement with the local community, detailed plans and letters were issued to Ardwick Ward Councillors, Arden School of Theatre and The Manchester College (Nicholls Campus) on the 22nd November 2021 detailing the proposal and welcoming any comments that wished to be brought forward.
- 4.5 To date no comments have been received from the Ardwick Ward Councillors, Arden School of Theatre or The Manchester College (Nicholls Campus), regarding the upgrade works proposed at Apex House, 2 Devonshire Street North, Manchester.

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) revised in July 2021.
- The local policy framework set out in the adopted Development Plan consisting of Extant Unitary Development Policies (UDP) and the Core Strategy Development Plan Document (2012-2027), adopted 11th July 2012.
- The Code of Best Practice on Mobile 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 local 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 high level 2G, 3G, 4G and now 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**', has further been included which sets out how 5G mobile connectivity will underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity.

5.4 To deliver improvements to existing services such as 2G, 3G and 4G and supporting future mobile technologies, it is essential that the planning system looks to support and facilitate installations such as that proposed to meet the Governments' Digital Strategy. In addition, modern connectivity, such as 5G, will be essential to help the Government meet its wider sustainability and climate change targets. The proposed installation has been designed to include 5G services and negate the need for an additional installation

in the area, as such we have enclosed the '**5G – Helping tackle climate change**' document for your consideration.

Balancing operational and environmental considerations

- 5.5 Paragraphs 3.2 – 3.3 of the Code of Best Practice explain that 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 Code of Best Practice emphasises that the NPPF now applies a reduced policy test compared to previous guidance. This helps clarify that 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.
- 5.6 In this instance, the installation of upgraded apparatus at this existing site managed by Cellnex, where the current apparatus is located aligns with this longstanding policy.
- 5.7 As a matter of principle, the development proposed is in accordance with the relevant policy framework and should therefore be acceptable. In the next section, the Design Considerations are reviewed to demonstrate that the detail of the development is also acceptable and that in accordance with the presumption in favour, planning permission should be granted.

Local Policy Considerations

- 5.8 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".
- 5.9 The Statutory development plan as defined by the Planning and Compulsory Purchase Act 2004 comprises the extant Unitary Development Policies of the Manchester Unitary Development Plan and the Manchester Core Strategy Development Plan.

Manchester Unitary Development Plan (July 1995)

- 5.10 The Manchester Unitary Development Plan (UDP) was adopted in July 1995 as the strategy document which set out guidelines for all development in Manchester and provided a framework from which to base decisions about planning applications.
- 5.11 The Manchester Core Strategy was adopted on 11 July 2012 which is the key development plan document in the LDF. It replaces significant elements of the UDP. However, a number of policies remain extant following the adoption of the Core Strategy including Policy DC 17.1 relating to telecommunications.
- 5.12 Policy DC 17.1 states that applications for telecommunications development will normally be approved if the Council can be satisfied that the development has been sited and designed to minimise its impact on residential amenity and in environmentally sensitive areas. Wherever possible the Council will expect the potential of existing buildings and masts, including the sharing of such facilities, to be fully explored before agreeing to additional separate development.
- 5.13 In the justification to Policy DC 17.1 the Council recognises the need for Manchester to be at the forefront in the field of telecommunications. The Council therefore starts from the presumption in favour of sustainable development and investment in the telecommunication systems serving the city. Equally, it wishes to ensure that new developments are brought forward in a way which protects residential amenity and minimises the visual impact of such development particularly in conservation areas and other environmentally sensitive areas in parks and the river valleys. The Council is also concerned to make maximum possible use of existing buildings and facilities by encouraging operators to share facilities wherever possible in order to avoid unsightly duplication and clutter.

Manchester Core Strategy DPD (July 2012)

- 5.14 The Manchester Core Strategy was adopted in July 2012 and sets out the long term strategic policies for Manchester's future development and will form the framework that planning applications will be assessed against.
- 5.15 The Core Strategy Vision states inter alia that:

“By 2027 Manchester will be:

- *A successful and accessible city in the front rank of cities in Europe and the world*
- *A city with a growing economy driven by the strength of the Regional Centre and Manchester Airport which supports a successful City Region. The knowledge-based economy flourishes with an entrepreneurial community, characterised by a fully skilled, inclusive working population.*
- *Meeting the challenge of climate change at the forefront of environmental initiatives and improvement and continuing to deliver sustainable development and a more effective green infrastructure.*
- *A city with an increased and sustainable healthy population and a community which both benefits from and drives the City’s productivity upwards.*
- *A city with neighbourhoods where people choose to live all their lives.”*

5.16 In order to help meet this vision the Core Strategy sets out a number of spatial objectives.

5.17 Spatial Objective SO1 relates to spatial principles and aims to provide a framework within which sustainable development of the city can contribute to halting climate change.

5.18 Spatial Objective SO2 relates to the economy and supports a significant further improvement of the City’s economic performance and spread the benefits of this growth across the City to reduce economic, environmental and social disparities, and to help create inclusive communities.

5.19 SO4 relates to Centres and aims to provide a network of distinctive, attractive and high quality centres, strengthening local identity, providing essential services close to homes and local access to healthy foods.

5.20 Policy SO1 relates to spatial principles and states inter alia that development in all parts of the City should:

- Make a positive contribution to neighbourhoods of choice including making a positive contribution to the health, safety and well-being of residents.

- Considering the needs of all members of the community regardless of age, gender, disability, sexuality, religion, culture, ethnicity or income.
- Minimise emissions.
- Improve access to jobs, services, education and open space by being located to reduce the need to travel.

5.21 Policy EC1 relates to employment and economic growth in Manchester. The policy states that the priorities for economic growth include:

- Ensuring the continued social, economic and environmental regeneration of the city.
- Ensuring the connectivity to international markets for the import and export of goods to ensure competitiveness in international markets.

5.22 Policy DM1 relates to development management. It is a general design policy which is not specifically related to telecommunications but contains some relevance for such applications. The policy states that all development should have regard to the following inter alia:

- Appropriate siting, layout, scale, form, massing, materials and detail.
- Impact on the surrounding areas in terms of design, scale and appearance of the proposed development. Development should have regard to the character of the surrounding area.
- Effects on amenity including privacy, light, noise, vibration, air quality, odours, litter, vermin, road safety and traffic generation.

5.23 In accordance with Policies SP1 and DM1's requirements for high quality design, 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 into the city. The visual effects have been further reduced by specifying the narrowest available profile of antenna support poles and by keeping the height of the antennas down to an absolute minimum whilst still meeting the technical and operational requirements required. It is also worth stating that the ancillary equipment will be out of sight to the general pedestrian.

5.24 The foreword to this Digital Strategy states:

'We live in a world where the number of digital devices has now passed the number of people. Digital technology is now shaping every aspect of our lives in ways which were inconceivable a generation ago: how we work, travel, shop, access services, meet people, communicate and are entertained.'

Greater Manchester has always been a pioneer city region, with an eye for opportunity and the drive and pragmatism to seek out new solutions to old problems with almost 80000 digital and digital-intense creative businesses in Greater Manchester employing more than 82300 people generating £4.1bn of economic growth annually.

In the Greater Manchester Strategy, we set a clear ambition to be a world-leading digital city region, and committed to taking an open, innovative and connective approach to delivering that ambition.

...to be a digital City-Region with a Difference and drive real change together, from the bottom up. We can only be a world leading city-region if we bridge the digital divide. Progress must be universal; geographically, socially and economically...using digital to connect young people to opportunity or tackle homelessness...we will capitalise on Greater Manchester's unique ability to use digital to connect and enhance our other high value sectors such as creative industries, health innovation and advanced manufacturing and materials.'

5.25 The GM Digital Strategy asks why it is vital for Greater Manchester to be a leading digital City-Region and quotes:

"The future vitality of cities is increasingly based on their ability to use digital networks in intelligent, strategic ways" (Aspen Institute, Washington).

5.26 The strategy goes on to state that:

...' digital technology has catalysed the interconnection of the global economy, with the internet enabling the free exchange of goods and services, providing consumers with greater choice and business with access to skills, resources and customers. As a result, people are not accessing more digital content and services from outside their

own country, cross-border payments increasing, and small companies are more easily becoming more “multi-national”.

Digital technology is increasingly the backbone of all industries, regardless of the nature and type of business. Embracing digital technology throughout all sectors, geographies and occupations is fundamental to Greater Manchester’s current and future international competitiveness’.

“We want to be recognised as an international thought leader and do-er in digital innovation and adoption across our economy and communities” ...

‘This strategy is therefore founded on evidence that becoming a leading digital city region is imperative to deliver our wider vision. We must do it to deliver the economic, social and inclusion improvements we need and want to see. We can do it because we have the vision, leadership and both the industrial and political will, coupled with strong academic, industrial and community foundations and an exciting and disruptive set of emerging activities and technology’.

5.27 The Digital Strategy sets out the Greater Manchester Vision: A city with a difference:

“It would be fantastic if we led the country in encouraging digital innovation which supports businesses and investment, creating jobs and opportunity, but focusing on improving outcomes for people such as loneliness or homelessness in our society.

I don’t want Manchester to be just a smart city – I want it to be the smartest city” (Andy Burnham Mayor of Greater Manchester).

5.28 The strategy goes on to state that the Vision for Greater Manchester is ‘to be one of the best places in the world for developing and harnessing digital technology and to be recognised as being a top 5 European Digital City Region by 2020 which:

- Empowers and enables residents to have the highest quality of life; and
- Supports the creation of high quality jobs and achieves the maximum possible productivity levels’.

5.29 Greater Manchester is aiming to become a world leading digital city by 2022. Greater Manchester plays a fundamental role in driving economic growth.

- 5.30 The strategy notes that in terms of mobile internet, despite good public WI-FI coverage in most public buildings across Greater Manchester, and on Metrolink and many buses, WI-FI provision is patchy in public places and there are still barriers to access (registration requirements and cost) in many parts of Greater Manchester.
- 5.31 The strategy also acknowledges that digital exclusion is closely linked with social exclusion. The Greater Manchester Action Plan for Infrastructure at 8.1 states that the connectivity which Greater Manchester requires is to increase average mobile and fixed broadband internet speeds and aims to improve call and mobile coverage including securing a national 5G test bed status thus positioning Greater Manchester at the forefront of next generation 5G mobile.
- 5.32 The strategy notes 5 digital enablers: Social Networks, Mobile internet/apps, digital health, infotainment and e-commerce.

Greater Manchester Local Industrial Strategy (June 2019)

- 5.33 This Local Industrial Strategy sets out how Greater Manchester (GM) will forge its future. It states that it will build on GM's position as a 'leading European digital city-region; enable the digitalisation of all sectors; and capitalise on the links between digital and creative industries that feed internationally significant clusters in broadcasting, content creation and media, and maximise growing assets in cyber security.
- 5.34 It aims to put in place the integrated 21st century infrastructure needed for digital driven, clean and inclusive growth. A top 5 city-region for the digital economy in Europe, with full fibre broadband and 5G coverage.

Greater Manchester Infrastructure Framework 2040 (GMCA)

- 5.35 This is a pre-cursor to the GM Infrastructure Strategy. The aim is to focus on developing infrastructure which ultimately improves the lives of all those living and working within Greater Manchester.
- 5.36 The infrastructure Framework acknowledges a number of key challenges, one of which is digital and the need to provide pervasive, affordable, resilient digital connectivity. The Framework notes that 'Digital technology is increasingly the backbone of the major industries and our daily lives'.

- 5.37 The Framework goes on to state that approaching 2040, Greater Manchester will need to be a smart and digitally ready City Region. To achieve this, and support on-going digitalisation, the region will require resilient fixed connectivity (through fixed fibre) supported by 5G (and subsequent technologies). It will also need to streamline the process for installation of new infrastructure within the street space.
- 5.38 Telecommunications development is highly sustainable. Indeed, mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data, video and voice calls to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared.
- 5.39 Central Government has expressed a support for new telecoms installations and the deployment of new technology. It is seen as essential for the country to develop and exploit the advantages of such new technology to the direct benefit of the public and the economy. As reflected in the Local Plan, it is seen that Local Government is key to the deployment of new technology and the upgrading of existing technology. We ask that this application be given due consideration and progressed for a positive determination.

National Planning Policy Framework (July 2021)

- 5.40 The governments National Planning Policy Framework (NPPF) was revised in July 2021 and consolidates most planning policy documents into a single circular.
- 5.41 Paragraph 10 of the NPPF confirms that sustainable development is at the heart of the Framework. Paragraph 11 states:

For decision taking this means:

- *Approving development proposals that accord with an up-to-date development plan without delay; or*

- *Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- *The application of policies in this framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

5.42 The proposal scheme will enable the operators to maintain and enhance 2G, 3G and 4G services in the area whilst also providing 5G services, forming part of a network of high technology. These services allow home working and working on the move and can reduce the need to travel, thus contributing to the sustainability agenda.

5.43 The Governments latest thinking strongly supports communications infrastructure. Section 10 relates to 'Supporting high quality telecommunication'. Paragraph 114 of the Framework document sets out the objectives of the Communications Infrastructure. It states that 'advanced, high quality, and reliable communications infrastructure is essential for economic growth and social well-being'. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology and full fibre broadband connections.

5.44 The proposed development accords with all these aspects of the NPPF in that it will provide MBNL who share this telecoms base station, with continued and improved network provision, within this suburban area of Greater Manchester, bringing a range of associated economic and technical benefits.

5.45 Section 12 of the Framework relates to 'Achieving well-designed places.

5.46 Paragraph 126 states: *'The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process'.*

5.47 Public benefits are defined within the NPPF and could be anything that delivers economic, social, or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. These principles are reflected at local level.

5.48 Although not the primary focus of this development proposal which main requirement is to provide upgraded 2G, 3G, 4G and 5G network coverage, Local Planning Authorities will have to weigh the Public Benefits of such connectivity with the requirements to instruct and manage the build environment. Central Government understands that this may present concerns with the various design solutions proposed but it is important that all Local Planning Authorities understand the technical needs of the proposed upgrades and better understand the wider advantages of such new technology. This is further emphasised within the National Infrastructure Commission's Report in 2016, where National Digital Strategy will be directed through the Economy and Industrial Strategy Cabinet Committee in order to:

"Support and challenge local government in their plans to enable the delivery of digital infrastructure; both in terms of ensuring that these plans help the UK to meet its national objectives, and that local authorities develop consistent approaches to support the deployment of mobile infrastructure across the country". 'Connected Future', National Infrastructure Commission, 2016.

5.49 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. In terms of this application, it is considered that the relevant policies of the Local Plan can be afforded due weights for the purposes of decision making as the relevant criteria within the policies applicable to the proposed development are consistent with the policies contained in the NPPF.

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 listed in Appendix A of the Code of Best Practice.

Amount, Design, Layout and Scale of the Development

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

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

The scale of the apparatus when installed will look proportionate to the structure as a whole. The antennas are similar to the existing electronic communications apparatus installed on the building and have been specifically located to meet the technical and operational requirements associated with ICNIRP guidelines. 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 wider 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 building plays host to the already existing rooftop base station and elevation mounted antennas, thus retaining the existing features of the building. The development proposed therefore fully reflects the function of the base station 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, 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.

- **Have minimal impact above the Roofscape and Skyline**

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 remain limited. 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 site the attention of the casual observer is likely to remain to be focussed more upon the road and 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 with what is already in-situ on the existing rooftop.

- **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 improve the local network 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 as well as in this case, airport safeguarding criteria.

- **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

- 6.3 The rooftop base station site is accessed via an internal stairwell to the main roof level and an outdoor hooped access ladder takes you onto the upper rooftop to the other parts of the existing operational rooftop site.
- 6.4 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.
- 6.5 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

- 6.6 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 the antennas and its support structures, 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.
- 6.7 The base station can be seen in views from immediate vantage points. However, considering that there are no sensitive land-uses placed in the immediate vicinity of the site, the impact is very minimal in nature.

Appearance

- 6.8 The sensitive approach to siting and design should minimise the appearance of the development proposed. The apparatus may be visible however, 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 separate documents called '**Health and Mobile Phones**' and '**5G Health and Safety**' which set out in more detail the associated health and safety considerations. Every installation on a site owned or managed by Cellnex will be compliant with international standards adopted by the UK Government. A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.
- 7.2 The ICNIRP guidelines seek to protect against the well-known thermal effects of radio emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.
- 7.3 National planning policy remains clear, provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines through the refusal of planning permission.

8. SUMMARY AND CONCLUSIONS

- 8.1 In summary, the application is in respect of electronic communications base station upgrades 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. The current installation requires equipment upgrades to meet the operator's license obligations and network capacity requirements. The base station will also accommodate new 5G technologies 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 2G, 3G, 4G and 5G cellular system. These impose particular locational and siting requirements. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.
- 8.5 The operator(s) has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:
- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Cellnex.
 - Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
 - An examination of design options to try and minimise potential visual impact.
- 8.6 The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.
- 8.7 This statement and the other accompanying material has demonstrated that the proposal is in accordance with local Development Plan Policy and National Policy set

out in particular within the NPPF. In particular it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.

- 8.8 In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one which the presumption in favour of development.