Town Planning Statement

5G Electronic Communications Base Station

At the Existing Cellnex Site

Rooftop at Clayton House
59 Piccadilly
Manchester
M1 2AQ

Site Reference 238897

CELLNEX AND MBNL

13th July 2022

1. INTRODUCTION

1.1 This statement is submitted in support of an application for planning permission for a 5G mobile base station for the mobile network operators (MNOs) EE Ltd and Hutchison 3G UK Ltd, in conjunction with Mobile Broadband Network Limited (MBNL). The application site is 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 The proposal is for the upgrading of an existing rooftop site at Browns Clayton House situated on the northern side of Piccadilly at the junction and to the west of Newton Street. The building hosts existing antennas and associated support structures at rooftop level and the purpose of the upgrade is to facilitate essential new 5G coverage and improved 2G / 3G & 4G service provision. The site is situated within a town centre retail area with a high demand for mobile network services.

2.2 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 rooftop or ground-based installation. It is important to note that in addition to being the sequentially preferable solution, the upgrading of an established rooftop site will fit in within the existing network configuration thereby eliminating the need to introduce additional base stations within the cell search 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 and separate ground-based installation within the target coverage area.

2.3 The sharing of base stations between multiple operators is one of the key strategic policy principles contained within Government Guidance. H3G and EE have a network sharing agreement and therefore these installations are fully compliant with the National Planning Policy Framework (NPPF). In keeping with the NPPF guidelines of using “high quality communications” (Section 10), the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing built environment.

2.4 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 Policy Framework advocates site sharing, and as such we believe that there are no sequentially preferable locations within the defined site search area.

2.5 The design of the proposed equipment is considered to be the least visually intrusive option available given the level of equipment required for 5G. Although it is accepted that there will be very marginally intensification in the amount of equipment it is felt that such a minor increase would not detract from the character of the area with any visual

effects being significantly outweighed by the immense benefits of the new 5G connectivity.

3. THE 5G PROPOSAL

3.1 The development proposed is shown in detail in the drawings submitted and is for a new 5G electronic communications base station. The deployment of 5G will utilise the MNOs existing 3G and 4G networks such as the base station already existing at the application site. As such, the application site is likely to carry different mobile connectivity services in parallel, with high data uses operating through the new 5G higher capacity network apparatus subject of this application.

3.2 Unlike earlier generations of mobile connectivity, 5G has more significant technical and operational requirements and this has implications on the amount, height, position and design of the new base station apparatus on the rooftop of the building. To help explain this important detail, we have set this out in the accompanying ***"5G Technical Support'*** document, which must be read in conjunction with this planning statement.

3.3 The principal elements of the proposed development at the application site reflect these various siting and design factors within the technical support document:

- The removal of existing wall mounted rooftop antennas and associated support structures.
- The installation of upgraded replacement wall mounted antennas and associated support structures.
- The removal and replacement of equipment cabinets at rooftop level.
- The installation of cabling and associated development.

3.4 The radio equipment housing will need to be mechanically ventilated to avoid overheating of equipment. The ventilation equipment is only likely to operate during the day during hot weather. If it is considered specific noise attenuation measures to be necessary, we would be pleased to discuss practicable solutions.

3.5 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 5G and the anticipated use of existing sites, including those owned by radio site infrastructure providers like Cellnex.

3.6 The application site has been selected by the operator as this will provide the required level of 5G network coverage while properly meeting national town planning policy objectives for the shared use of existing electronic communication sites, in this case 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 an Amber score when assessed against the industry traffic light rating model.

4.2 The pre-application consultation in relation to the application site was undertaken with your Authority and Ward Councillors (Adele Douglas, Jon-Connor Lyons and Sam Wheeler), Manchester Airport (CAA) and Royal Manchester Children's Hospital (CAA). At the time of submission there has been no response to this pre-application consultation and accordingly 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 Policy, especially the National Planning Policy Framework (NPPF)
- The local policy framework set out in the adopted Development Plan;
- 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 planning authority, you will be familiar with this framework and so in the interests of brevity, we do not rehearse it back to you in detail but address instead the principal themes to demonstrate that the application accords with them.

National Support for Modern Communications

5.3 There is significant UK Government support for the delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. Our accompanying document of national policy '**National Policy - Delivering Ultra-Fast Broadband Mobile Connectivity',** sets out how 5G mobile connectivity will underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. It is essential that the planning system looks to support and facilitate new 5G base station installations such as that proposed to meet the Government's Digital Strategy. In addition, modern connectivity, such as 5G, will be essential to help the Government meet its wider sustainability and climate change targets and we explain this in more detail in our accompanying document '***5G – Helping tackle climate change'***.

The Need to Conserve the Historic Environment

5.4 In this case the site falls within the Stevenson Square Conservation Area and Clayton House is a Grade II Listed Building and therefore a Heritage Statement has been provided in support of the proposal.

5.5 The upgraded telecommunications equipment will be wall mounted at rooftop level at Clayton House at 59 Piccadilly, which is a six-storey building of approximately 27.1m in height to ridge level at the highest part of the rooftop area.

5.6 The building was built in 1907 and the English Heritage listing provides the following description:

5.7 *MANCHESTER PICCADILLY (north side) No.59 Clayton House, and 61*

GV II Restaurant, warehousing and offices. Dated 1907 at top floor; by W and G Higginbottom. Portland stone facade with brown terracotta ground floor, slate roof. Long narrow rectangular plan at right-angles to street. Jacobean Baroque style.

Six storeys and three bays, symmetrical; small cornice to ground floor, panels over outer fourth-floor windows lettered "CLAYTON" "HOUSE", prominent cornice over fourth floor with mutules and egg-and-dart enrichment, dentilled cornice over fifth floor broken in the centre by a Baroque-style broken-pedimented upstand lettered "AD MCMVII". The ground floor has doorways to left and right, both with pedimented surrounds and that to left with frieze lettered "CLAYTON HOUSE", and C20 shop window between; the upper floors have mullion-and-transom windows, mostly six lights, including a canted oriel tiered from second to fourth floors, those in the outer bays at second floor with triangular pediments, that at third floor of the oriel with a segmental pediment enclosing a lion-mask cartouche, and all these with ornamental wrought-iron balconies. Tall corniced chimneys at the gables.

The architects are Walter Higginbottom (1850-1924) and George Harry Higginbottom (1852 - 1927). These are not to be confused with William Herbert Higginbottom (1868 –1929), who was born in Leeds but moved to and practised in Arnold, Nottingham.



Figure 1: View of Clayton House from Portland Street

5.8 The visual effects of the proposed upgrade will be extremely minor due to the small scale of the equipment in comparison to the overall bulk of the host and surrounding buildings. It should also be noted that although there will be a marginal intensification of equipment the upgraded antennas will be installed in a similar position to the existing antennas that will be removed to facilitate the upgrade. The site benefits from the screening effects associated with the high density of surrounding tall buildings thereby limiting the field of view towards the existing and proposed upgraded equipment.

5.9 The proposed upgrade is the least visually intrusive coverage solution available within the sensitive Listed Building / Conservation Area setting and has been carefully sited and designed to respect the aesthetics of the sensitive surrounding area. It is important to note that the proposed alterations will not have a negative impact on the Conservation Area and nearby listed buildings.

5.10 The general presumption in favour of allowing development for modern communications, and the special operational and technical factors that require siting of base stations within the Conservation Area, is balanced by the need to conserve or enhance their heritage qualities.

5.11 However, 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 than an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.

5.12 In balancing these requirements, the starting point for planning new networks or the expansion of existing networks is to use existing electronic communications sites owned by other operators or radio site management companies, such as Arqiva. This policy objective is backed with the statutory obligation placed upon operators to share apparatus, where practicable out under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.

5.13 In this instance, the installation of upgraded apparatus within an existing rooftop site, rather than the introduction of an entirely new and separate base station**,** aligns with this longstanding policy.

5.14 Nonetheless, any potential harm the apparatus would cause to the designated heritage asset must be assessed, as set out in NPPF paragraph 194 and how to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. In this case, all reasonable steps have been taken, through careful siting at an existing Arqiva site, to moderate the visual impact of the development, having regard to technical and operational factors. Accordingly, the proposal looks to conserve the heritage asset.

5.15 In so far as there may be any perceived harm, the development proposal will have less than substantial harm to the significance of a designated heritage asset and as such, this harm has to be weighed against the public benefits of the proposal (paragraph 202). In this respect the base station is required as part of a national mobile communications network, necessary to extend and improve mobile connectivity to the local area and has wider public interests. As explained, the target coverage area falls within the designated area and the special operational and technical requirements necessitate siting of new apparatus within it.

5.16 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

5.17 At local level, the proposal has been considered against the Manchester Local Development Framework Core Strategy Development Plan Document (2012) / Citywide Development Control Policies SP1 (Spatial Principles) and DM1 (Development Management) and the Unitary Development Plan for the City of Manchester (Adopted 1995)

Saved Policy DC17.1 – Telecommunications Policy SP 1 Spatial Principles states:

Spatial Principles

The key spatial principles which will guide the strategic development of Manchester to 2027 are:

- *The Regional Centre will be the focus for economic and commercial development, retail, leisure and cultural activity, alongside high quality city living.*
- *The growth of Manchester Airport will act as a catalyst for the regional economy and will also provide the impetus for a second hub of economic activity in this part of the City.*
- *Beyond these areas, the emphasis is on the creation of neighbourhoods of choice, providing high quality and diverse housing around district centres which meet local needs, all in a distinct environment. The majority of new residential development in these neighbourhoods will be in the Inner Areas, defined by the North Manchester, East Manchester and Central Manchester Regeneration Areas.*
- *The City is covered by regeneration areas including the City Centre. All development should have regard to the character, issues and strategy for each regeneration area as described in the North, East, Central and South Manchester and Wythenshawe Strategic Regeneration Frameworks and the Manchester City Centre Strategic Plan.*

- *The City's network of open spaces will provide all residents with good access to recreation opportunities. The River Valleys (the Irk, Medlock and Mersey) and City Parks are particularly important, and access to these resources will be improved.*
- *New development will maximise the potential of the City's transport infrastructure, in particular promoting walking, cycling and use of the public transport. The extension to the Metrolink network through the Oldham and Ashton lines will create key corridors for new development.*

Core Development Principles

Development in all parts of the City should:-

- *Make a positive contribution to neighbourhoods of choice including:-*
    - *creating well designed places that enhance or create character.*
    - *making a positive contribution to the health, safety and wellbeing of residents*
    - *considering the needs of all members of the community regardless of age, gender, disability, sexuality, religion, culture, ethnicity or income.*
    - *protect and enhance the built and natural environment.*
- *Minimise emissions, ensure efficient use of natural resources and reuse previously developed land wherever possible.*
- *Improve access to jobs, services, education and open space by being located to reduce the need to travel and provide good access to sustainable transport provision.*

Policy DM 1 Development Management states:

Development Management

All development should have regard to the following specific issues for which more detailed guidance may be given within a supplementary planning document:-

- *Appropriate siting, layout, scale, form, massing, materials and detail.*
- *Impact on the surrounding areas in terms of the 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, birds, road safety and traffic generation. This could also include*

proposals which would be sensitive to existing environmental conditions, such as noise.

- *Accessibility: buildings and neighbourhoods fully accessible to disabled people, access to new development by sustainable transport modes.*
- *Community safety and crime prevention.*
- *Design for health.*
- *Adequacy of internal accommodation and external amenity space.*
- *Refuse storage and collection.*
- *Vehicular access and car parking.*
- *Effects relating to biodiversity, landscape, archaeological or built heritage.*
- *Green Infrastructure including open space, both public and private.*
- *The use of alternatives to peat-based products in landscaping/gardens within development schemes.*
- *Flood risk and drainage.*
- *Existing or proposed hazardous installations.*
- *Subject to scheme viability, developers will be required to demonstrate that new development incorporates sustainable construction techniques as follows (In terms of energy targets this policy should be read alongside policy EN6 and the higher target will apply):-*

a) *For new residential development meet as a minimum the following Code for Sustainable Homes standards. This will apply until a higher national standard is required:*

Year 2010 – Code Level 3;

Year 2013 - Code Level 4;

Year 2016 - Code Level 6; and

b) *For new commercial developments to demonstrate best practice which will include the application of the BREEAM (Building Research Establishment Environmental Assessment Method) standards. By 2019 provisions similar to the Code for Sustainable Homes will also apply to all new non-domestic buildings.*

The Unitary Development Plan for the City of Manchester Policy DC17.1 states:

Applications for telecommunications developments 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.

Reasons:- The Council recognises the need for Manchester to be at the forefront in the field of telecommunications. The Council therefore starts from a presumption in favour of new 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 equipment, 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.

5.18 In accordance with the relevant requirements of the Manchester Local Development Framework Core Strategy Development Plan Document (2012) / Citywide Development Control Policies and the Unitary Development Plan for the City of Manchester (Adopted 1995) policy requirements, the proposal is for a sensitively designed upgrade of an existing shared rooftop installation.

5.19 In accordance with Policies SP 1 and DM 1'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. The visual effects have been further reduced by keeping the height and bulk of the antennas down to the absolute minimum capable of providing the required coverage. It is also worth stating that the ancillary equipment enclosure upgrades will be out of sight towards the central area of the roof. The visual effects of the proposed upgrade will be extremely minor being of small scale in comparison to the overall bulk of the host building. It is considered that the proposed upgrade will not overly intrude into the locality and any associated visual impact will not outweigh the continued need and future demands to provide coverage to the surrounding area.

5.20 In accordance with the requirements to minimise visual impact set out in Policy DC17.1 the existing rooftop site has been selected in a discretely mounted rooftop position surrounded by tall buildings and situated as far away as technically possible from the

views of residential properties. The site benefits from the masking effects associated with the high rooflines of the surrounding buildings and there is scattered tree planting along both sides of Piccadilly forming a screening barrier for ground level views towards the site. It should also be noted that the antennas and associated support pole have been mounted in a position set back from the edge of the roof area to reduce the visual envelope within the Conservation Area.

5.21 The justification for Policy DC17.1 - Telecommunications acknowledges that technology developments and access to digital services such as the internet are critical to Manchester's economic, environmental and social development. The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operators and minimising environmental impact.

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.

Physical Context

6.2 The proposed upgrade site has been carefully selected in a position capable of providing the required new essential 5G coverage within the setting of an existing rooftop base station in the heart of a busy retail district. The site is hosted on a Grade II listed building situated within the Stevenson Square Conservation Area with numerous other listed buildings within the vicinity and therefore the proposal is for the sensitively designed upgrading of an existing installation rather than introducing a new base station within the target area. The scale of the upgraded equipment will be relatively minor in comparison to the overall bulk of the host building and the visual effects of the upgrade will be softened by the removal of the existing antennas that will be replaced by the upgraded equipment. The height and bulk of the equipment has been kept down to the absolute minimum capable of providing the required coverage and the ancillary equipment enclosure upgrades have been positioned out of sight towards the central area of the flat roof. The upgrading of an existing shared existing facility will fit into the existing network configuration thereby eliminating the need to provide new and entirely separate additional base stations within the target area.

6.3 The visual envelope of the existing and proposed equipment will be extremely constrained by the high density of surrounding tall buildings. These masking effects will be further enhanced at ground level by scattered tree planting housed within the pavement areas along both sides of Piccadilly. The site has been carefully selected in a position capable of providing the required essential upgraded coverage whilst being situated as far away as technically possible from the views of residential receptors and represents the least visually intrusive coverage solution within the sensitive conservation area setting.

Amount, Design, Layout and Scale of the Development

6.4 The scale, layout and design of the development has been guided by the special 5G technical and operational factors affecting the need to provide coverage to the local area, having regard to the need to minimise visual impact. With regard to the main component elements of the development proposed*:*

- **Kept 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 and 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. The scale of the equipment has been kept down to the absolute minimum capable of providing the required coverage and elements of the existing building have been incorporated in the design to screen views of the equipment wherever possible.

  Have minimal impact above the roofline commensurate with technical constraints

  The apparatus that projects above the roofline has been kept to the minimum having regard to the technical parameters and design considerations explained above. The impact on the apparatus remains contained and new views towards this apparatus from the local vantage points remain limited.

- **Not be detrimental to views and general skyline**

  A combination of design, topography and natural and manmade features should help keep any perceived changes to views and the skyline to within acceptable limits. Indeed, within the context of this urban location the attention of the casual observer is likely to remain be focussed more upon the streetscape.

- **Avoid creating clutter**

The apparatus should not look unduly cluttered and insofar as it might be visible it will be viewed as operational electronic communications equipment compatible and now expected on a building designed and constructed exclusively for electronic communications purposes.

- **Use clean lines and maintain symmetry**

  The apparatus has clean lines and has been sited to maintain symmetry with both the building and its different elements.

Antenna Array

- The numbers of antennas and dishes and their size has been kept to the minimum necessary to provide 5G coverage and to link this site back into the operator's network. The design of these features is very much driven by operational and technical factors.

Equipment Cabinets

- The number of radio equipment cabinets and their size has been limited to what is required to meet the operator's current and foreseeable network requirements. The location and design of the equipment cabinets, and the electronic communications equipment housed within them, reflects their functionality and the technical and operational requirement to be in reasonable proximity to the antenna systems and dishes that they support. This avoids exceptionally large runs of feeder cables and associated supporting trays, and the subsequent loss of signals.

Access Considerations

6.5 Access to the site will be provided from the existing rooftop access points.

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

6.7 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

6.8 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 in any event.

6.9 The ancillary equipment will be out of sight set back from the edge of the roof to mitigate its impact in views from public vantage points nearby. The visual effects of the antenna additions will be extremely minor, and any impact will be softened by the removal of existing equipment as part of the upgrade proposal. For these reasons, additional landscaping is not considered necessary or appropriate to the setting and has not been included within the scheme.

Appearance

6.10 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 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 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.

8.2 The service provided by the operator is in the public interest and is in very high demand, with 5G being the next and highly significant advancement in mobile connectivity. In the UK mobile services now exceed fixed landlines in terms of customer numbers and usage.

8.3 The public interest of the system is clear from the considerable benefits that will flow and it makes a significant and major contribution towards sustainable objectives.

8.4 The operator's requirement is in the context of network needs associated with a 5G cellular system. These impose particular locational and siting requirements which are even greater with 5G. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.

8.5 The operators have 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.
- Engagement in accordance with the Code of 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 national policy set out in particular within the NPPF. In particular it is a form of development that is

specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.

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