Town Planning & Heritage Statement

5G Electronic Communications Base Station

At the *Existing BT Telephone Exchange*

Euston TE, Euston Road, Camden, London, NW1 2BH

Cellnex Project ref: COM-0007834 Site ref: 166657

CELLNEX UK CTIL

September 2023

1. INTRODUCTION

1.1 This statement is submitted in support of an application for planning for a 5G mobile base station for the mobile network operator(s) (MNOs) Telefónica UK Ltd, in conjunction with Cornerstone. The application site is owned / operated by Cellnex UK, a radio site infrastructure provider.

1.2 The application includes:

- A description of the site and surrounding area
- A description of the proposal
- A statement of community engagement
- A review of planning policy considerations
- A review of design and access considerations

1.3 A number of other accompanying documents have been submitted in support of the application and these are referred to and should be read in conjunction with this statement.

2. THE SITE AND SURROUNDING AREA

2.1 The application site comprises part of the roof of the Euston Telephone Exchange, an unlisted, five-story building located within the Bloomsbury Conservation Area. The building is located on Euston Road and has a red brick façade. The Telephone Exchange is not hugely prominent in the street as it is linked to other buildings on both sides, allowing it to blend in. The Telephone Exchange is located in between Barry's Bootcamp and a University College London building. The UCL campus building attached to the West side of the Telephone Exchange is glass fronted and provides modern context the wider street scene. There is telecommunications equipment already in situ on the rooftop.

3. THE 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. 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 6No. antenna; 3No. at 25.0m and 3No. at 25.7m.
- The installation of new 7.5m high bespoke FLI monopole with new slimline headframe.
- The installation of 6No. antenna; 3No. at 26.8m and 3No. at 28.115m to be installed on the proposed headframe.
- Proposed 12No. RRUS to be installed on rails fixed to proposed gantry poles.
- Proposed 1No. Percy PSU to be installed on proposed grillage platform.
- Proposed 2No. flatpack frame to be installed on proposed steel work.
- Proposed GRP shroud to be installed.

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. The cabinets are located upon the rooftop and not in close proximity to other properties as such there should be no major impact. If it is considered specific noise attenuation measures to be necessary, we would be pleased to discuss practicable solutions.

3.5 Paragraphs 16 & 17 of the Code of Practice for Wireless Network Development in England, published in March 2022, explains how mobile networks operate. In the annual network rollout information supplied, the operators will have explained their network requirements for 5G and the anticipated use of existing sites, including those owned by site infrastructure providers like Cellnex UK.

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 communications masts and sites, in this case owned / operated by Cellnex UK.

4. PRIOR ENGAGEMENT

4.1 The recently revised National Planning Policy Framework (NPPF) and the Code of Practice for Wireless Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received an amber rating when assessed against the traffic light rating model as referenced in the Code of Practice.

4.3 In our engagement letter, sent out on the 15th of June 2023, we sought to agree with you the appropriate traffic light rating and associated engagement requirements with the local community and obtain your comments on the siting and design of the development.

4.4 A formal pre-application letter was received from the Council on the 14th of September 2023. The Councils response was positive and ultimately concluded that the proposal is acceptable in this instance.

> *"Given the limited visibility of the proposed telecommunications equipment from the streetscape, it is considered that the proposal would not adversely impact the character of the Conservation Area.*
>
> *Although the visual impact of the proposed telecommunications equipment is considered to have minimal visual impact from street level, this increases the potential for visual impacts in longer views, which needs to be carefully considered when electing the location of the proposed telecommunications equipment. Being located within the centre, as currently proposed, would be an acceptable outcome."*
>
> *"The proposed development is unlikely to lead to a significant loss of outlook or sunlight/daylight from primary habitable rooms of neighbouring properties due to the structure, in its current form, not being an adversely projecting figure on the roof of the building."*

Within their pre-application response the Council are clear to note that they will only grant planning permission for development which does not affect or cause harm to the amenity of the Conservation Area. Steps have been taken to ensure that any harm is kept to a minimum. The proposed equipment will covered in a GRP Shroud. This will be discussed in more detail in the planning assessment section of this document.

4.5 Additionally, further consultation was undertaken with Ward Councillors S. Francis, A. Harrison, and R. Madlani of the Bloomsbury Ward. Due to the nature of the works proposed on the established base station rooftop site no further consultation is being proposed at this time. No response was received from the Ward Councillors in this instance.

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 Camden Local Plan (adopted 2017)
- Bloomsbury Conservation Area Character Appraisal
- The Code of Practice for Wireless Network Development in England.

5.2 From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development. As planning authority, you will be familiar with this framework and so in the interests of brevity, we do not rehearse it back to you in detail, but address instead the principal themes to demonstrate that the application accords with them.

National Support for Modern Communications

5.3 There is significant UK Government support for the delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. Our accompanying document of national policy '***National Policy - Delivering Ultra Fast Broadband Mobile Connectivity'*** sets out how 5G mobile connectivity will underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. 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'***.

Balancing operational and environmental considerations

5.4 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.

5.5 However, there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs for 5G, the NPPF now applies a reduced policy test compared to previous guidance. This helps to 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 balancing these requirements, the starting point for the 5G networks or the expansion of existing networks is to use existing electronic communications sites owned by other operators or radio site management companies such as Cellnex UK. This policy objective is backed with the statutory obligation placed upon operators to share apparatus, where practicable out under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.

5.7 A replacement stub mast is required in this instance as the existing antenna support system is not suitable for the provision of and supporting of the apparatus for 5G equipment. The development entails the use of an existing site owned or managed by Cellnex UK which is in operational use and where equipment and support structures are already an established feature of the site and wider landscape. Within this context the replacement stub mast will be seen as an acceptable and justified use, reflecting all of the considerations within paragraphs 114 - 118 of the NPPF and:

- 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 necessitate siting of a stub mast within it;

- All reasonable steps have been taken, through careful siting at an existing Cellnex UK communications site, to moderate the visual impact of the development, having regard to technical and operational factors. In this case,

the replacement of an existing support system which is now an established and accepted feature within the landscape;

- The proposal to share this existing communication site, through the installation of a replacement stub mast, looks to strike the optimum solution, particularly when compared with the alternative of erecting a new base station elsewhere and the development of an associated compound on a site nearby and with it the associated additional resources in developing a new site

5.8 The replacement stub mast requires planning permission, as the operational needs and associated design of the stub mast means that it falls outside the relevant width and height limitations of outright permitted development pursuant to the Town and Country Planning (General Permitted Development) (England) Order 2015 (the 'GPDO'), as amended most recently on the 4 April 2022. However, the relaxation of permitted development rights within the Amendment Order clearly reflects the Government's strong emphasis towards the reuse and redevelopment of existing electronic communications installations to minimise the need for further structures elsewhere and this proposal clearly follows the emphasis within that particular guidance. The availability of permitted development rights to replace the existing structure must be a material consideration in the determination of the application (and as a 'fall-back' consideration).

5.27 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

5.28 At local level, the proposal has been considered against Camden Local Plan. Adopted in July 2017 the Local Plan ensures that the Camden continues to have robust, effective, and up-to-date planning policies that response to change and the boroughs unique characteristics. Whilst the Local Plan does not have a telecommunications specific policy, the following statement of support can be found within the Local Plan.

"The Council recognises the importance of digital infrastructure in enterprise development and expects electronic communication networks, including telecommunications and high speed broadband, to be provided in business premises."

The following policies, found within the Local Plan are relevant to the assessment of this application.

Policy D1 – Design

The following aspects of Policy D1 are relevant to the assessment of this application.

"The Council will seek to secure high quality design in development. The Council will require that development:

a. respects local context and character;

b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;

c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;

d. is of sustainable and durable construction and adaptable to different activities and land uses;

e. comprises details and materials that are of high quality and complement the local character;

f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;

m. preserves strategic and local views;

o. carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions"

Policy D2 – Heritage

The following aspects of Policy D2 are relevant to the assessment of this application.

"The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a. the nature of the heritage asset prevents all reasonable uses of the site;

b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;

c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

d. the harm or loss is outweighed by the benefit of bringing the site back into use.

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;

f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;

g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and

h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage."

Policy A1 – Managing the Impact of Development

"The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.

We will:

a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;

b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;

c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and

d. require mitigation measures where necessary.

The factors we will consider include:

e. visual privacy, outlook;

f. sunlight, daylight and overshadowing;

g. artificial lighting levels;

h. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;

i. impacts of the construction phase, including the use of Construction Management Plans;

j. noise and vibration levels;

k. odour, fumes and dust;

l. microclimate;

m. contaminated land; and

n. impact upon water and wastewater infrastructure."

5.29 The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operator 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. However, to assist your consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations. Due regard has been given to the factors addressed from Paragraph 20 of the Code of Practice.

Physical Context

6.2 This proposal will see the replacement of in situ telecommunications equipment with a new 7.5-meter FLI monopole, 6No. antennas, 12.No PRU's, and 1No. Outdoor PSU, all within a GRP shroud, on the rooftop of the Euston Telephone Exchange. The GRP shroud will be of a brick design which will blend with the design of the Telephone Exchange. Pedestrians and vehicles travelling along Euston Road will have some visibility of the top of the shroud, however due to its design it will most likely look like a chimney. Due to the positioning of the proposal, the equipment will not be visible from Endsleigh Gardens or from any of the surrounding buildings.

Amount, Design, Layout and Scale of the Development

6.3 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. With regard to the main component elements of the development proposed:

- The design of the proposed stub mast is led by operational and technical factors of 5G, although the choice of stub mast design does reflect insofar as practicable observations made during the pre-engagement process. The local topography will limit such views from public vantage points and any sensitive visual receptors.

- Any impacts on the landscape and visual amenity will be limited and moderated by confining height to what is required for operational reasons. Compared to

other forms of vertical infrastructure also found in the landscape, the stub mast proposed is a benign structure: it is much lower than the television broadcast masts owned and operated by Arqiva; it is lower and does not form a sting of structures that march across the countryside like pylons; and it does not move like wind turbines, which are typically higher and are usually developed in clusters.

Antenna Array

- The numbers of antennas and dishes and their size has been kept to the minimum necessary to provide coverage and to link this site back into the operator's 5G 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.

Planning Assessment

Modern cities are required to provide both residents and visitors with digital connectivity to enable their day to day living and enjoy recreational activities, all of which contributes to the vitality of the city and its economic and social sustainability.

This proposal would see the upgrading of an existing telecommunications base station to deliver 5G mobile connectivity to meet the Governments Digital Strategy and to bring about the significant benefits associated with this advanced next generation mobile connectivity. As the proposal will only see the addition of new antennas to equipment that is already in situ, it is considered that any impact in terms of siting would not be a consideration in this instance given the principle would not be in question. Any building or property that has a direct view of the telephone exchange already has visibility of the existing equipment, to which this proposal is of a similar design and height. It is

therefore clear that this proposal would NOT alter the existing landscape setting in any distinguishable manner.

Part of this proposal will see the equipment cover in GRP shroud. This will allow the equipment to blend with the surroundings and limit the visual impact of proposal. This meets the aims of Policy D1 found in the Local Plan as it will allow the equipment to *"integrate well with the … wider area"* and *"preserve strategic and local views".* Ultimately, this will limit any visual harm and prevent any negative outlook in this instance.

In addition to the above, this proposal also meets the aims of Policy A1 found in the Local Plan. Policy A1 states that the Council look to protect the quality of life of occupiers and neighbours whilst balancing the needs of development. This proposal will see the expansion and improvement of the telecommunications network in the area, whilst minimising environmental and visual harm. This proposal is the ideal balance between improving public benefit and reducing environmental harm.

The proposed equipment is limited to the minimal operational requirement to ensure adequate capacity and connectivity. This proposal takes advantage of an existing base station to ensure that the number of masts within the Council's area are kept to a minimum. the benefits that this proposal would bring to the wider community greatly outweigh any harm. As a rooftop site, this proposal ensures that footpaths and the public realm will remain clutter free, accessible, safe and attractive. The proposed works will largely be unseen from ground level. In particular, the siting, height, and design of this proposal will not cause harm to the character or appearance of the areas or the building on which it is located. In this instance, the proposal will not harm the surrounding area or the building it is to be located; but it will provide a great service to the surrounding community whilst meeting the aims of the Governments Digital Strategy.

The Need to Conserve the Historic Environment

Paragraph 195 of the NPPF notes that Local Planning Authorities should take into account the significance of any heritage assets that may be affected by a proposal. This is done to avoid or minimise any conflict between the heritage assets conservation and the proposed development. In this case the site is located within the Muswell Hill

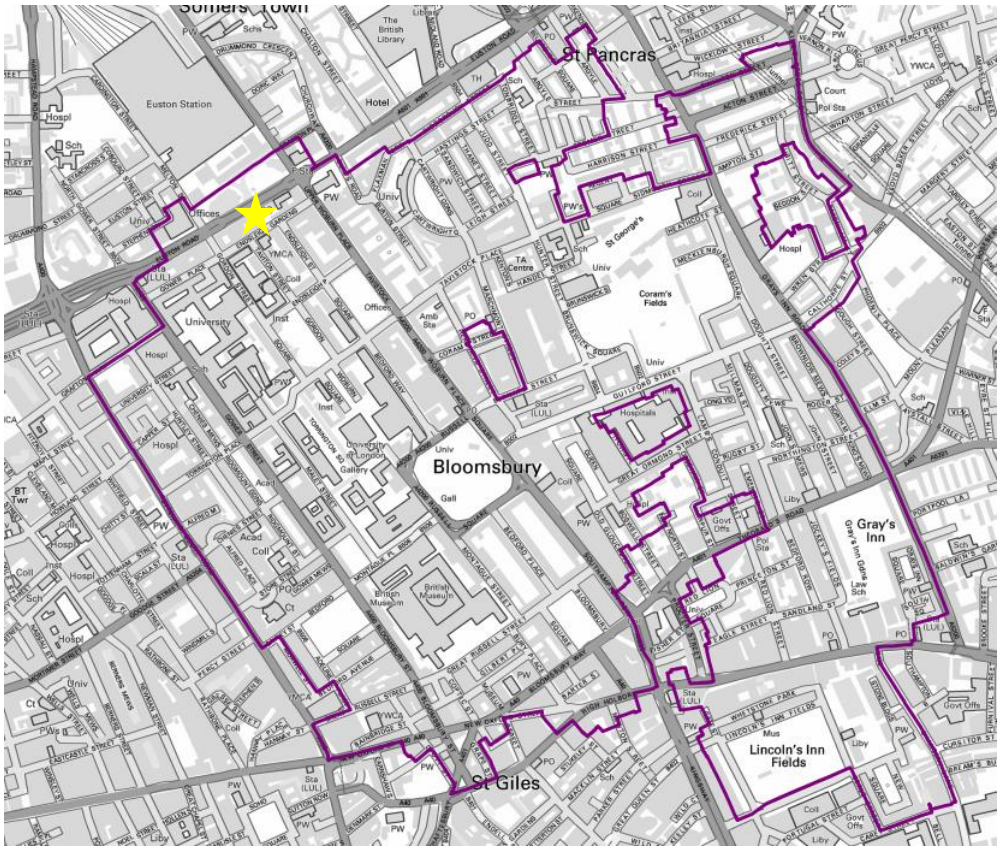
Conservation Area. As such, this heritage asset is considered as part of this design and heritage statement.

Heritage Statement

The Council have prepared a Character Appraisal for the Bloomington Conservation Area which provides a helpful summary of the history and character of the area.

First designated in 1968, the Bloomsbury Conservation Area covers about 160 hectares; from Euston Road in the North to High Holborn and Lincoln's Inn Fields in the South, and Tottenham Court Road in the West to Kings Cross Road in the East. Bloomsbury is noted for its formally planned arrangement of streets and the contrasting leafy squares. The main arterial routes tend to have larger scale buildings, addressing broader, busier streets. With the exception of Euston Road (formerly New Road), which was built as a by-pass in the 18th century, these arterial routes follow older historic alignments of roads or tracks.

Image 2: A Boundary Map of the Bloomsbury Conservation Area (the site is identified by a yellow star)



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.

However, there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs, the NPPF now applies a reduced policy test compared to previous guidance. This helps clarify than an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.

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

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

Nonetheless, any potential harm the apparatus would cause to the designated heritage asset must be assessed, as set out in NPPF paragraph 195 and how to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. In this case, all reasonable steps have been taken, through careful siting at an existing Cellnex UK site, to moderate the visual impact of the development, having regard to technical and operational factors. Accordingly, the proposal looks to conserve the heritage asset. The proposal meets the aims of Policy DM2 found in the Local Plan. Additionally, within their pre-application response, the Council noted

> *"Given the limited visibility of the proposed telecommunications equipment from the streetscape, it is considered that the proposal would not adversely impact the character of the Conservation Area."*

This shows that the Council agree with our argument that the proposal will not have a detrimental effect on the immediate area. That being said, the Council did note their concern for the impact of the proposal on wider views. These views have been taken into consideration, and the equipment will be covered in GPR shroud which will obscure the equipment, making it look like a brick chimney. This will minimise any visual harm from long distance views.

In so far as there may be any perceived harm, the development proposal will have less than substantial harm to the significance of a designated heritage asset and as such, this harm has to be weighed against the public benefits of the proposal (paragraph 202). In this respect the base station is required as part of a national 5G mobile communications network, necessary to extend and improve mobile connectivity to the local area and has wider public interests. As explained, the target coverage area falls within the designated area and the special operational and technical requirements necessitate siting of new apparatus within it.

Access Considerations

6.4 Access to the site will be provided via the rooftop of the Euston Telephone Exchange.

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

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

Landscaping

6.7 The proposed siting of the development has been very carefully chosen to minimise environmental impact. Any potential impact of the development is principally associated with radio mast, which is the most visible component of the base station.

6.8 As noted above, the proposed equipment will be partially visible when travelling along Euston Road. However, as there is already telecommunications equipment on the roof of the Telephone Exchange (that this proposal will replace), then there is already a context and a precedent in this instance. Views of the Telephone Exchange will not be markedly different as such views already include telecommunications equipment. In fact, this proposal will seek to minimise visual harm by proposing a GRP shroud which will surround the equipment with brick looking façade. Due to the positioning of the equipment on the rooftop, none of the surrounding buildings will have a direct view of the proposal in this instance.

Appearance

6.9 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 stub mast and compound may be visible, they should look straight forward in appearance and reflect their 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 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 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 there are now more than 92.5 million subscriptions to mobile networks and mobile services now exceed fixed landlines in terms of customer numbers and usage.

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

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

8.5. The operator has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:

- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Cellnex UK.
- Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
- Engagement in accordance with the Code of Practice procedures.
- An examination of design options to try and minimise potential visual impact.
- The replacement of an existing radio mast, compared with the alternative of erecting a new mast and the development of an associated compound on a site nearby and with it the associated additional resources in developing a new site.

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.