**Town Planning Statement**

**5G Electronic Communications Base Station**

**At the Existing Cellnex Site**

**Rooftop at St Pancras Hospital**

**4 St Pancras Way**

**Camden**

**Greater London**

**NW1 0PE**

**Site Reference 238721**

**CELLNEX AND MBNL**

**30th March 2021**

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, 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 St Pancras Hospital on the northern side of Pancras Road to the east of the junction with St Pancras Way. 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 mixed use residential and commercial 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 rooftop antennas, ancillaries and associated support structures.
* The installation of upgraded replacement antennas, ancillaries and associated support structures.
* The removal and replacement of equipment cabinets within an existing equipment cabin.
* 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 (Samata Khatoon, Paul Tomlinson and Roger Robinson), Regent High School (The Headteacher) and St Aloysius Nursery Pre-school (The Manager). 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**

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.

1. 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

1. 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**

1. In this case the site falls within the Kings Cross St Pancras Conservation Area and therefore a Heritage Statement has been provided in support of the proposal.

**Heritage Statement**

1. The upgraded telecommunications equipment will be located on the St Pancras Hospital on the northern side of St Pancras Road, which is a building of approximately 39m in height to the top of the roof tower area. The site benefits from the screening effects associated with the high density of surrounding tall buildings and scattered tree planting housed within the pavement area along both sides of Pancras Road thereby limiting the field of view towards the existing and proposed upgraded equipment.



Figure 1: View of St Pancras Hospital from Pancras Road

1. The upgraded antennas will be installed in a similar position as the existing antennas that will be removed to facilitate the upgrade. The visual effects will be extremely minor due to the small scale of the equipment in comparison to the overall bulk of the host and surrounding buildings. The proposed upgrade is the least visually intrusive coverage solution available 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.
2. 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.
3. 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.
4. 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. 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.
6. 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.
7. 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.
8. 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

1. At local level, the proposal has been considered against The London Plan: Spatial Development Plan for Greater London and Newham Local Plan (2018) Policies S1 – Spatial Strategy and Strategic Framework, SP1 Borough-wide Place-making, SP3 Quality Urban Design within Places, SP5 Heritage and other Successful Place-making Assets, SP7 Quality Movement Corridors and Linear Gateways, INF4 - Utilities Infrastructure & INF9 Infrastructure Delivery.
2. The London Plan (adopted March 2021) is the new Spatial Development Strategy for Greater London now forming part of the statutory development plan. The document sets out the Mayor’s vision for Good Growth along with a framework for how London will develop over the next 20-25 years.

Policy GG1 Building strong and inclusive communities states:

Good growth is inclusive growth. To build on the city’s tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:

1. Encourage early and inclusive engagement with stakeholders, including local communities, in the development of proposals, policies and area-based strategies
2. Seek to ensure changes to the physical environment to achieve an overall positive contribution to London
3. Provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation
4. Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city
5. Ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging, which encourage community buy-in, and where communities can develop and thrive
6. Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for building relationships during the daytime, evening and night-time
7. Ensure that new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements
8. Support and promote the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.

Policy GG 5 Growing a good economy states:

*To conserve and enhance London’s global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:*

1. *Promote the strength and potential of the wider city region*
2. *Seek to ensure that London’s economy diversifies and that the benefits of economic success are shared more equitably across London*
3. *Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration*
4. *Ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London’s growth*
5. *Ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning*
6. *Promote and support London’s rich heritage and cultural assets, and its role as a 24-hour city*
7. *Make the fullest use of London’s existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity*
8. *Recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London’s economic success*

Policy SI 6 Digital connectivity infrastructure states:

1. *To ensure London’s global competitiveness now and in the future, development proposals should:* 
   1. *ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users*
   2. *meet expected demand for mobile connectivity generated by the development*
   3. *take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation*
   4. *support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.*
2. *Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access*

In accordance with the requirements of London Plan Policies SI 6, GG1 and GG5 the proposal will deliver reliable critical mobile digital infrastructure by upgrading an existing base station allowing for the provision of essential new 5G coverage. Camden Planning Guidance document – CPG Digital Infrastructure also emphasises the importance of communications networks in terms of facilitating economic growth throughout the borough.

The Camden Local Plan 2017 does not include a specific telecommunications policy and therefore the NPPF is of relevance along with Policies A1 Managing the impact of development, D1 Design, D2 Heritage and Camden Planning Guidance documents CPG Design, CPG Amenity and CPG Digital Infrastructure.

Policy A1 Managing the impact of development states:

*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*

Policy D1 Design states:

*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;*

*g. is inclusive and accessible for all;*

*h. promotes health;*

*i. is secure and designed to minimise crime and antisocial behaviour;*

*j. responds to natural features and preserves gardens and other open space;*

*k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*

*l. incorporates outdoor amenity space;*

*m. preserves strategic and local views;*

*n. for housing, provides a high standard of accommodation; and*

*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.*

*Tall buildings*

*All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to*

*p. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;*

*q. the historic context of the building’s surroundings;*

*r. the relationship between the building and hills and views;*

*s. the degree to which the building overshadows public spaces, especially open spaces and watercourses; and*

*t. the contribution a building makes to pedestrian permeability and improved public accessibility.*

*In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability.*

*Public art*

*The Council will only permit development for artworks, statues or memorials where they protect and enhance the local character and historic environment and contribute to a harmonious and balanced landscape design.*

*Excellence in design*

*The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under Policy G1 Delivery and location of growth will be provided through high quality contextual design.*

Policy D2 Heritage states:

*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*

*Listed Buildings*

*Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. To preserve or enhance the borough’s listed buildings, the Council will:*

*i. resist the total or substantial demolition of a listed building;*

*j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and*

*k. resist development that would cause harm to significance of a listed building through an effect on its setting.*

*Archaeology*

*The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.*

*Other heritage assets and non-designated heritage assets*

*The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares. The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.*

1. In accordance with the importance Policies A1, D1 and D2 place on minimising visual impact the proposal is for a sensitively designed upgrade of an existing shared site housed on the rooftop of the South Wing of St Pancras Hospital. 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. The visual effects of the proposed upgrade will be relatively minor being of small scale in comparison to the overall bulk of the host building. It is felt that the upgrading of an existing rooftop site will be a significantly less visually intrusive solution than introducing a new and entirely separate ground-based facility within the cell search area.
2. The visual effects have been minimised by keeping the bulk of the antennas down to the absolute minimum capable of achieving the required coverage and the visual effects of the upgrade will be softened by the removal of existing antennas to be replaced by the upgraded equipment. It is also worth stating that the ancillary equipment enclosure upgrades will be out of sight within an internal equipment room.
3. The visual effects of the proposed upgrade will be further reduced at ground level by the screening effects associated with scattered mature tree planting housed within the pavement area along both sides of Pancras Road and defining the verge boundaries in Goldington Crescent. 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**

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**

1. 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 base station housed on the central tower structure on the St Pancras Hospital on the northern side of Pancras Road and to the east of the junction with St Pancras Way.
2. The site is situated within the Kings Cross St Pancras Conservation Area and there are numerous 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 extremely 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 bulk of the upgraded 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 within an existing equipment cabin. 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.
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 due to the scattered tree planting housed within the pavement area along both sides of Pancras Road and defining the boundaries of the verge areas within Goldington Crescent. 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**

1. 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**

1. Access to the site will be provided from the existing rooftop access points.
2. Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.
3. 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**

1. 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.
2. The ancillary equipment will be out of sight within an existing equipment cabin 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**

1. 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.