

Town Planning Statement

Proposed Upgrade of the Electronic Communications Base Station

**At
Cherry Lane Cemetery, Shepiston Lane, West Drayton, Hillingdon,
London, UB7 9DL**

Site Reference 1490106

**Cellnex UK, EE Limited & Hutchison 3G UK Limited, and Mobile
Broadband Network Limited**

September 2021

1. INTRODUCTION

- 1.1 This statement is submitted in support of an application for prior approval to upgrade a mobile base station to provide improved 2G, 3G, 4G, and 5G coverage for the mobile network operators (MNOs) EE Limited and Hutchison 3G UK Limited, in conjunction with Mobile Broadband Network Limited (MBNL). The application site is managed 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 application site comprises an existing electronic communications base station, which consists of a 22.5m high lattice mast hosting antennas with cabins and cabinets in a fenced compound, on the northern side of Cherry Lane Cemetery. The base station is set back from any main roads and is 400m away from Shepiston Lane to the south and 170m away from Pinkwell Lane to the east which provides the access route through the cemetery to reach the base station.
- 2.2 Immediately to the east is land comprising parts of Cherry Lane Cemetery and residential housing is further beyond on Skipton Drive. The land extending south of the base station is the remainder of Cherry Lane Cemetery. Open land occupies the space to the west of the base station and to the north is an area of allotments with Bourne Farm Recreation Ground beyond.
- 2.3 The base station is located within the Green Belt and is not within any conservation areas. The nearest heritage asset is the Grade II Listed War Memorial Cherry Lane Cemetery (List Entry Reference 1393676) located 340m south of the base station within the cemetery.
- 2.4 The base station is a long-standing telecommunications site first developed in 1993 under planning permission reference 35298/A/93/0046 and is presently host to electronic communications equipment operated by EE Limited, Hutchison 3G UK Limited, Telefonica UK Limited, and Vodafone Limited. The existing mast was erected in 1997 when planning permission was granted to replace the existing 15m mast with a 22.5m lattice mast under case reference 35298/D/97/1680.

3. THE 5G PROPOSAL

- 3.1 The development proposed is shown in detail in the drawings submitted and is for the upgrade of a base station to provide 2G, 3G, 4G and 5G coverage for EE Limited and Hutchison 3G UK Limited through their joint network sharing venture called Mobile Broadband Network Limited (MBNL).
- 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 base station's proposed apparatus. 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:
- A 2.5m extension to the 22.5m high lattice mast to increase the overall height to 25m
 - The removal of six attached antennas
 - The installation of six replacement antennas and six additional antennas at a mean height of 23m
 - The relocation of three 0.3m diameter transmission dishes on new steelwork at a mean height of 22.5m
 - The installation of twenty-four Remote Radio Units (RRUs)
 - Ancillary apparatus including cables connecting the antennas and other apparatus
- 3.4 The apparatus proposed is not coloured green (the proposed antennas and dishes) or blue (antenna, headframe, and dish support poles and bracket), as drawn on the submitted drawings, but has been shown this way for illustrative purposes only to differentiate them from the other existing electronic communications apparatus.
- 3.5 The respective finishes for the apparatus proposed are as follows:
- Antennas and RRUs: these are made of aluminium and supplied in light grey
 - Transmission dishes: made of aluminium and faced in off-white/light grey

- The antenna and dish support brackets and poles are untreated aluminium and steel that will weather to a dull grey colour

3.6 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 in the past, the operators will have explained their network requirements and the anticipated use of existing sites, including those managed by radio site infrastructure providers like Cellnex.

3.7 The application site has been selected by the operators as this will provide the required level of 5G network coverage while properly meeting national town planning policy objectives for the shared use of existing electronic communication sites, in this case managed by Cellnex.

4. PRIOR ENGAGEMENT

- 4.1 The 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 the colour Green when assessed against the traffic light rating model (see Appendix B of the Code of Best Practice).
- 4.2 In this case, the proposal involves a 2.5m extension to the existing mast and the installation of additional telecommunications equipment. As an acceptable form of development can be brought forward as explained further within this statement, then formal pre-application engagement with the LPA was deemed unnecessary. However, if you do have detailed comments to make on the proposals we would be please to discuss these with you at an early stage in the determination of this application.
- 4.3 In accordance with the traffic light score and Best Practice, we have not carried out community engagement with residents in the immediate area for this development. However, given the base station is located within three kilometres of Heathrow Airport, and therefore requires compliance with paragraph A.3 (3) of The Town and Country Planning (General Permitted Development) (England) Order 2015 (the GPDO), we notified Heathrow Airport of our intention to carry out the development proposed in this application on 9 February 2021.
- 4.4 By email dated 10 February 2021, Heathrow Airport's Airside Works & Safeguarding Manager confirmed that the development would not raise any aerodrome safeguarding concerns. A copy of this response can be provided on request.
- 4.5 In addition to this notification, we also provide a document confirming EE Limited's compliance with Ofcom guidance regarding air traffic radio interference measures: **EE Ltd - Conformance to Regulation relating to Mobile Site Deployment in the context of possible interference to Air Traffic Control Radar.**

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, which comprises the London Plan 2021, the London Borough of Hillingdon Local Plan: Part 1 - Strategic Policies, and the Local Plan Part 2 Development Management Policies and Site Allocation and Designations
- 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 a 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.

5.3 We also highlight that the provisions of Part 16 of the GPDO do not require the Council's determination of siting and appearance matters to have regard to the provisions of the Development Plan for this simple reason that planning permission has already been granted by the Order. The following information is provided to assist the Council to understand the siting and design of the development, as well as the public benefits of mobile connectivity services.

National Support for Modern Communications

5.4 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.

- 5.5 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'**.
- 5.6 The delivery of mobile connectivity relies on the development of telecommunications infrastructure which should be encouraged by local planning authority policies. Local planning policies should help facilitate development proposals which contribute to improved mobile connectivity to help local communities receive the benefits of greater mobile connectivity. Some of these benefits are explained in our accompanying documents: **'5G Connected Vehicles and 5G Ecosystem'**, **'5G Smart Cities'**, and **'5G Benefits for Health and Emergency Services'**.
- 5.7 The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operators and minimising environmental impact.

Balancing operational and environmental considerations

- 5.8 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.
- 5.9 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 for 5G, the Code of Best Practice emphasises that the NPPF now applies a reduced policy test compared to previous guidance. This helps clarify that an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.
- 5.10 In balancing these requirements, the starting point for the 5G networks is to use existing electronic communications sites owned by other operators or radio site management companies, such as Cellnex. 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.

- 5.11 In this instance, a 2.5m extension to the existing mast and the installation of apparatus at an existing site managed by Cellnex, where there are existing operations which align with this longstanding policy.
- 5.12 This proposal is supported by, and accords with, the guidance in Section 10 of the NPPF, which provides further guidance on the Government's objective of providing high quality communications networks in England. The NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services.
- 5.13 The development proposed accords with the specific guidance contained in paragraph 113 and 115 of the NPPF, and the Code of Best Practice on Mobile Network Development, for the shared use of telecommunications sites. In view of this position, and as the proposal involves a short extension to the mast and minor changes necessary to upgrade the existing base station, we consider it unnecessary to have regard to the issue of alternative sites in the determination of this application.
- 5.14 In support of this position, we draw your attention to the policy guidance in paragraph 115 of the NPPF, which deals with the sequential approach for site selection. This states that:

*"115. Applications for telecommunications development (including for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

...(c) for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure..."*
- 5.15 This strand of national planning policy makes clear that information on alternative sites is required only in circumstances when it is not possible to install apparatus at existing telecommunications sites or on tall buildings and other structures. Consequently, information on alternative sites is not provided, or required to be submitted, as part of this determination of this application.

The Need to Protect the Green Belt

- 5.16 The application site falls within the Green Belt. The general presumption in favour of allowing development for modern communications, and the special operational and technical factors that require siting of base stations, is balanced by Green Belt protection policies.
- 5.17 Consequently, the proposal is subject to guidance contained in Section 13 'Protecting Green Belt land' of the NPPF, where a presumption against inappropriate development applies in certain circumstance. Similar local policy is contained within the London Plan 2021 which explains the Green Belt should be protected from inappropriate development under 'Policy G2 London's Green Belt'.
- 5.18 Electronic communications development is not included in the list of acceptable uses within the Green Belt set out in paragraph 145 of the NPPF where a presumption against inappropriate development applies. However, we consider that the development should be treated as a building for the purposes of the guidance in paragraph 145 (d) of the Framework. This advises local planning authorities that the replacement of a building should not be treated as inappropriate development provided the new building is in the same use and not materially larger than the one it replaces.
- 5.19 This position applies here, as the mast extension and the additional equipment will be installed within the site compound without minor alternation to the extent of the built footprint of the base station. While there will be a marginal increase in height – 25m compared to 22.5m above ground level – we consider that this change does not constitute a material difference for the purposes of paragraph 145(c) of the Framework. In reaching this conclusion, we also highlight that the existing antennas extend above the 22.5m mast to 24m above ground level. This compares to the development proposed where the replacement and additional antennas will only extend marginally above the extended 25m mast. The change will therefore appear minimal.
- 5.20 Most obviously, the changes will take place at a previously developed location where the openness of the Green Belt has already been affected to a certain degree. The proposed extended mast will not alter this position to any significant extent, nor will it reduce openness further, and hence it should not be treated as inappropriate development. We also highlight that the development proposed will not conflict with the purposes of including the application site within the Green Belt, a position accepted by the Council when it granted planning permission in 1993 for the base station and

again in 1997 for a replacement lattice mast which is the existing structure at the base station.

- 5.21 Even if openness is affected to a material degree then, in accordance with the advice within paragraph 144 of the NPPF, the operational needs of 5G explained previously, the shared use of electronic communications infrastructure in accordance with the regulatory and planning policy framework, and the wider public benefits of the operator's network coverage, collectively constitute very special circumstances sufficient to outweigh the limited harm that may be perceived. Furthermore, there are no other preferable, suitable and available sites outside the Green Belt that would lead to a better environmental solution that can be used in this case. This position, in itself, constitutes very special circumstances.
- 5.22 Finally, it is significant that the development proposed will not offend any of the five purposes behind including land within the Green Belt as identified at paragraph 134 of the NPPF. To the contrary, the important contribution that 5G modern communications development will make to sustainability objectives will if anything help support those purposes. The proposal, therefore, accords with Green Belt planning policy.
- 5.23 As a matter of principle, the development proposed is in accordance with the relevant policy framework and should be 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

- 5.24 At local level, the proposal has been considered against the London Plan 2021. The proposal is supported by adopted Policy SI 6 Digital Connectivity Infrastructure in the London Plan, which includes in criteria 3 and 4 the respective aims of meeting the expected demand for mobile connectivity across London and supporting the effective use of suitably located mobile digital infrastructure to meet this demand.
- 5.25 Also having regard to the importance of ICT and mobile broadband to the London economy, the Mayor has published two further documents relevant to the application proposal: the draft London Infrastructure Plan 2050; and the report '*Raising London's High Speed Connectivity to World Class Levels*'.

- 5.26 As part of the work on the 2015 London Plan Alterations, the Mayor commissioned work to develop a long-term infrastructure investment plan for London, and in 2014 the 'London Infrastructure Plan 2050' was published for consultation. One of the stated aims of the Infrastructure Plan is to enable fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 Digital Connectivity of the Plan indicates how the Mayor's Office will support a mix of technologies including mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term, as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s.
- 5.27 These objectives are perhaps most clearly expressed in the Executive Summary of the plan, which provides the following statement:
- "Digital connectivity. Our aim is for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 discusses how we will develop a map of London's connectivity, which will be used for connectivity ratings of individual properties and to identify where networks need to be improved. It sets out how we will support an economically viable mix of technologies including fibre broadband, mobile broadband and future methods of wireless internet delivery. It also discusses how we will work with Ofcom to ensure sufficient radio spectrum is identified to address the capacity crunch in the short term as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s."*
- 5.28 The improvements to the base station proposed fully supports the Mayor's Infrastructure Plan, as the coverage and services provided will allow, amongst others, businesses and residents in Hillingdon to receive high-speed 4G and 5G mobile broadband internet connectivity.
- 5.29 The Mayor's report: 'Raising London's High Speed Connectivity to World Class Levels' provides the background to, and amplifies, Chapter 16 Digital Connectivity of his Infrastructure Plan. The report notes the availability of internet access not only affects the productivity of businesses and proves essential to the future growth of many firms but is also vital for many residents to take part in modern society, as more services move online. It also notes among other matters, that 'Mobile operators already experience difficulty obtaining permission from local authorities...to increase capacity for their networks in areas where there is high demand'.
- 5.30 As with the London Plan 2021 and the draft London Infrastructure Plan, the application proposal is fully in support of the objectives of Raising London's High Speed Connectivity to World Class Levels.

(c) The Hillingdon Local Plan

5.31 Many of the strands of national and regional telecommunications planning policy are reflected in Policy DMHB 21: Telecommunications of the Local Plan Part 2, which sets out several criteria to be used in determining applications for telecommunications development. In respect of these criteria, we highlight the following:

- In respect of criteria (i) and (ii), the proposal involves the upgrade of a long-standing existing base station located on the northern side of Cherry Lane Cemetery. As can be seen from the submitted site plan and elevation drawings, the proposed upgrade will result in a 2.5m extension to the mast and minor changes to the equipment installed at the existing base station. Although the mast extension will be more visible, its height has been kept to the minimum necessary to achieve operational and technical requirements. The remaining changes, comprising six replacement antennas, six additional antennas, and three relocated transmission dishes, will not increase the visibility of the development to any material degree and therefore accord with the requirement to minimise visual impact.
- Criterion (iii): the proposal represents best practice in terms of the shared use of electronic communications sites. As the proposal relates to the upgrade of an existing base station, the operator's technical requirement cannot be met by an alternative site elsewhere.
- Criterion (v) requires development proposals to minimise impacts on buildings of historical interest. We consider this objective has been met by the installation of the replacement and additional antennas and relocated transmission dishes on an existing mast with a 2.5m extension. Although we recognise that the mast extension will be slightly more visible, these minor additions and mast extension will not have a major adverse visual impact on the nearest heritage asset, the Grade II listed War Memorial located 340m to the south within the cemetery.
- An INCNIRP Certificate is provided in accordance with criterion (vi).

5.32 The base station is located within the Green Belt and is therefore must adhere to 'Policy DMEI 4: Development in the Green Belt or on Metropolitan Land' in the Local Plan Part 2. We believe the development proposed accords with the criterion detailed in this policy. This Policy states:

B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Lane will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

- i) the height and bulk of the existing building on the site;*
- ii) the proportion of the site that is already developed;*
- iii) the footprint, distribution and character of the existing buildings on the site;*
- iv) the relationship of the proposal with any development on the site that is to be retained; and*
- v) the visual amenity and character of the Green Belt and Metropolitan Open Lane*

5.33 The extension of the existing mast will certainly not have greater impact on the openness of the Green Belt considering the base station is an already existing piece of infrastructure. Given the scale of the proposed development, including the proposed 2.5m extension and the minor addition of electronic communications equipment, we believe the proposal will not have a significant visual impact on the character of the Green Belt. As a result, the development proposed complies with local green belt policy.

6. DESIGN CONSIDERATIONS

- 6.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended. However, to assist your consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations. Due regard has been given to the factors listed in Appendix A of the Code of Best Practice.

Amount, Design, Layout and Scale of the Development

- 6.2 The development relates to the installation of electronic communications apparatus at an existing base station on the northern side of Cherry Lane Cemetery which comprises an existing 22.5m high mast located outside of any designated Conservation Areas. The proposed development will extend this mast by 2.5m to create a 25m high mast.
- 6.3 The base station is located within the Green Belt with the nearest residential properties beyond the cemetery to the east on Skipton Drive. Allotment gardens are located immediately north of the base station and a playing field is further beyond the allotments. Open land also borders the site to the west.
- 6.4 The existing base station is presently host to electronic communications apparatus operated by EE Limited, Hutchison 3G UK Limited, Telefonica UK Limited, and Vodafone Limited that have been the subject of several planning applications over the years. The application proposal involves the installation of EE and Hutchison 3G equipment at the base station through the installation of replacement and additional electronic communications apparatus with ancillary works.
- 6.5 The 2.5m mast extension is required to provide appropriate siting of 5G apparatus which requires deployment at an increased height compared to previous generations of electronic communications equipment such as 4G.
- 6.6 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 and explained in detail in the '**5G Technical Considerations**' statement.

6.7 With regard to the main component elements of the development proposed, we highlight the following:

- The mast extension, and the height of the apparatus, including the antennas, has kept to the minimum required having regard to the technical parameters and design considerations explained previously. Although the mast extension will be slightly more visible, we consider the scale of the mast extension and additional apparatus will have a benign impact on the overall visuality of the existing base station.
- The mast extension, the numbers of antennas, their size, and their positioning have been kept to the minimum necessary to improve EE and Hutchison 3G's coverage and services to the local community. The design of these features is very much driven by operational and technical factors.
- The size of the transmission dishes and their position on the mast is also dictated by technical and operational considerations. The most restrictive of these considerations is that the proposed dishes operate on a Line of Sight (LOS) basis to connect with dishes at other base station sites elsewhere in London. LOS links operate much like the beam of light from a torch and can be broken by tall buildings, trees, and hills. Consequently, transmission dishes need to be positioned at heights and in orientations where there are clear and unobstructed LOS paths to other dishes in the operator's network. The proposal before you achieves this critically important technical constraint.

Access Considerations

6.8 Construction and future maintenance access to the site will be provided by the existing vehicular entrance to the base station from the throughway within Cherry Lane Cemetery which has an entrance on Shepiston Lane to the south. This existing and long-established access route does not require any amendment as part of the development proposed.

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

- 6.10 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 proposed.

Landscaping

- 6.11 The proposed siting of the development has been very carefully chosen to minimise environmental impact. Any potential impact of the development is principally associated with the mast extension and the additional antennas, which is the most visible component of the base station, and which cannot be fully screened for operational reasons. The height of the apparatus on the mast extension means that any attempt to screen it in its entirety would be unrealistic in any event.

Appearance

- 6.12 The sensitive approach to siting and design should minimise the appearance of the development proposed. 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, this application is in respect of a minor upgrade to an electronic communications base station necessary to improve a vital network that provides public services.
- 8.2 The service provided by the operators 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 operators' 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 operators' surrounding network.
- 8.5 As has been demonstrated in this planning statement, any visual impact associated with the proposed development will be minimal and the development will be fully in accordance with the Development Plan.
- 8.6 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.
 - An examination of design options to try and minimise potential visual impact.
- 8.7 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.

- 8.8 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.
- 8.9 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.