

Town Planning Statement

5G Electronic Communications Base Station

At Existing Cellnex Site

Northwood Duck Hill Road, Northwood Cricket Club, Duck Hill Road, Northwood, Hillingdon, HA6 2RX (NGR E: 507975 N: 191795)

Site Reference: COM-0026655

Cellnex UK and CTIL

April 2024

1. INTRODUCTION

- 1.1 This statement is submitted in support of an application for prior approval for a replacement mast at an existing site for the mobile network operator(s) (MNOs) Vodafone Ltd and Telefónica UK Ltd, in conjunction with Cornerstone Telecommunications Infrastructure Ltd (CTIL). The application site is 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 must be read in conjunction with this statement.

2. SITE AND SURROUNDING AREA

- 2.1 The application site is for the replacement of a monopole mast at the existing base station located at the rear of the Northwood Cricket Club clubhouse on Duck Hill Road.
- 2.2 The existing site is an established telecommunications base station site currently accommodating a 15m monopole mast, located to the rear of the clubhouse building. It is a well located site to serve the wider area. The car parking area to the extensive Mount Vernon Hospital site is located to the rear, separated by a belt of trees providing screening and attenuation. There is residential development to the north and east with good separation provided by the cricket club grounds, and there is a private health and fitness centre with large car park to the south.
- 2.3 The proposal involves replacing the existing 15m monopole mast with a 20m monopole mast accommodating 6 no. antenna and ancillary radio equipment, 1 no. GPS Module to be relocated onto proposed gantry pole within extended compound, internal upgrades to existing equipment cabinets within compound, extension to compound, and ancillary development thereto. The proposal is for an upgrade to facilitate essential new 5G coverage and requires the installation of a replacement mast with a larger headframe to accommodate the new upgraded equipment.



The existing site to the rear of the Clubhouse

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. 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 installation of a replacement monopole 20 metre mast on new concrete foundation, to accommodate 6 no. replacement antenna and ancillary radio equipment onto new headframe.
- The relocation of 1 no. GPS Module onto proposed gantry pole within compound.
- Upgrades to equipment cabinets within compound and extensions to compound area including chain link fence.
- The installation of cabling and associated development.
- Ancillary development thereto.

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. This is as established at the site.

3.5 Paragraphs 16 and 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 radio 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 communication 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 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 'amber' when assessed against the traffic light rating model as referenced the Code of Practice. We have written to the local ward councillors representing the ward and no comments or concerns have been received.
- 4.2 In our engagement letter we sought to agree with you the appropriate traffic light rating and associated engagement requirements and obtain your comments on the siting and design of the development. As we have not received any response from your authority, we would be pleased to address any necessary matters within the determination period of the application.
- 4.3 In view of the location, we have served Notice on MOD Safeguarding and Heathrow Airport Safeguarding and the CAA. Both MOD and Heathrow airport have confirmed that there are no objections to the proposal. This is included in the submission.

5. PLANNING POLICY

5.1 The relevant planning policy and best practice framework is found principally within:

- National Policy, especially the National Planning Policy Framework (NPPF)
- The local policy framework set out in the adopted Development Plan
- The Code of Practice on 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. 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 mast is required in this instance, as the existing mast is already developed to full capacity due to the amount of existing equipment already installed. The development entails the use of an existing site owned or managed by Cellnex UK which is in operational use and where a mast is already an established feature of the site and wider landscape. Within this context the replacement mast will be seen as an acceptable and justified use, reflecting all of the considerations within paragraphs 118 - 122 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 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 mast which is an established and accepted feature within the landscape;

- The proposal to share this existing communication site, through the installation of a replacement 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 mast requires prior approval, as the operational needs and associated design of the 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 December 2023. 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).

The Need to Protect the Green Belt

5.9 The application site falls within the London Metropolitan 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.

5.10 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 required under the former PPG8.

5.11 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.

- 5.12 A replacement mast is required in this instance, as the existing mast is already developed to full capacity due to the amount of existing equipment already installed. The development entails the use of an existing site owned or managed by Cellnex UK which is in operational use and where a mast is already an established feature of the site and green belt. Nevertheless, 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 Development Plan policy which is addressed next in this statement.
- 5.13 As the proposal already benefits from planning permission under the provisions of Class A of Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, the issue of inappropriate development and the related test of very special circumstances do not arise in this case. Similarly, as the proposal benefits from the permitted development rights granted by the Order, it does not offend any off the five purposes of including the application site within the Green Belt.
- 5.14 The issues for determination relate solely to the siting and appearance of the development, which is acceptable having regard to the technical and operational constraints of providing specific coverage for the operator. Importantly, there are no sites located outside of the Green Belt that are preferable, suitable or available alternatives to the proposal and it, therefore, accords fully with Green Belt planning policy. This is especially case as the proposal involves the replacement of an existing mast which is already an established feature existing at the site and within the Green Belt.
- 5.15 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

5.16 At local level, the proposal has been considered against the relevant policies within The London Plan: Spatial Development Plan for Greater London and the London Borough of Hillingdon Local Plan: Part One & Part Two - Strategic Policies (November 2012).

5.17 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.

5.18 Policy SI 6 Digital Connectivity Infrastructure supports mobile connectivity and the use of suitably located sites to accommodate mobile digital infrastructure:

5.19 In accordance with the emphasis London Plan SI 6 places on the importance of investment in digital communications the proposal will deliver reliable critical mobile digital infrastructure by upgrading an existing base station allowing for the provision of essential new 5G coverage.

5.20 Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) Policy DMHB 21: Telecommunications states that telecommunication development will only be permitted where:

- i. it is sited and designed to minimise their visual impact;*
- ii. it does not have a detrimental effect on the visual amenity, character or appearance of the building or the local area;*
- iii. it has been demonstrated that there is no possibility for use of alternative sites, mast sharing and the use of existing buildings;*
- iv. there is no adverse impact on areas of ecological interest, areas of landscape importance, archaeological sites, Conservation Areas or buildings of architectural or historic interest; and*
- v. it includes a Declaration of Conformity with the International Commission on Non Ionizing Radiation.*

5.21 In line with the requirements of this policy and other relevant policies of the Local Plan placing emphasis on the importance of high-quality design, the proposal is for a sensitively located upgrade of an existing site at the rear of the Northwood Cricket Club Clubhouse. The proposal is entirely in accordance with this policy as the proposed

replacement mast at an existing established site which benefits from a high degree of screening and separation from the surrounding area. The replacement mast, whilst higher with a wider headframe, is located some distance across the cricket club grounds from the residential properties, Rickmansworth Road accommodates good tree cover along the boundary with the cricket club site further screening the site to the local residential properties. The site is also separated by car parking and tree cover from the hospital and health club sites. The upgrade in this location will not have an unacceptable detrimental effect on the visual amenity, character or appearance of the local area whilst providing an important upgrade to local connectivity and is entirely in line with Policy DMHB 21.

- 5.22 The upgrade is for an existing base station and is supported by a declaration of conformity with ICNIRP.
- 5.23 The proposed development, which is entirely in line with policy, 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, 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 addressed from Paragraph 20 of the Code of Practice.

Physical Context

6.2 The application site currently accommodates an existing base station and is located at the rear of the Northwood Cricket Club clubhouse where the structure stands amongst large mature trees which aid the attenuation of the structure. It is acknowledged that the scale of the upgraded equipment will be larger than existing, this is required to accommodate the new upgraded equipment for shared users and has been kept at the minimum required. The proposed upgrade of this site with good screening and separation to surrounding users, albeit with a larger structure, is preferable to seeking a completely new site to accommodate a new mast in the area.

Amount, Design, Layout and Scale of the Development

6.3 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, already referred to above explained in detail in the '**5G Technical Support**' document. With regard to the main component elements of the development proposed:

5G Mast design

- The design of the proposed mast is led by operational and technical factors of 5G, although the choice of mast design does reflect insofar as practicable observations made during the pre-engagement process. Whilst the structure proposed will be evident from any near views, the design will help ameliorate presence over distance. The local topography will limit wider views from public vantage points and any sensitive visual receptors.

- The mast and upgraded headframe cannot be hidden, but any impacts on the landscape and visual amenity will be limited and moderated by confining width increase to what is required for operational reasons. Compared to other forms of vertical infrastructure also found in the landscape, the 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.
- Alternative designs like shareable tree masts have been considered, but they cannot accommodate the amount of apparatus necessary to support 5G. Even if a tree mast could be designed to support such apparatus, it would still amount to an engineering solution unlikely to replicate the natural features and character of a tree and would appear as a prominent and incongruous feature in the wider landscape.

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.

Access Considerations

6.4 Access to the site will be provided from the existing entrance to the Northwood Cricket Club via Duck Hill Road.

- 6.5 Once constructed, the development will be unstaffed 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, and which cannot be fully screened for operational reasons. The height of the mast means that any attempt to screen it in its entirety would be unrealistic in any event.
- 6.8 At ground level, the compound will be set amongst existing natural screening that will minimise its visual impact. For this reason, additional landscaping is not considered appropriate and has not been included within the scheme.

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 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 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 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(s) has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:
 - Network planning based upon existing sites, including those controlled by Radio Site Management companies like Cellnex.
 - Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
 - Engagement in accordance with the Code of Best 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.