Town Planning Statement

Upgrade to Electronic Communications Base Station

At the Existing Cellnex Site / BT Telephone Exchange

Northwood TE,
Dene Road,
Hillingdon,
Greater London,
HA6 2BT
(NGR: E: 509068 N: 192141)

Site Reference: 244627_COM-18424

Cellnex and CTIL

October 2023

1. INTRODUCTION

1.1 This statement is submitted in support of an application for planning permission for an upgrade to an existing established site for the mobile network operators (MNOs) Vodafone Ltd and Telefónica UK Ltd, in conjunction with Cornerstone Telecommunications Infrastructure Ltd (CTIL) by Cellnex UK. The application site is owned / 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 upgrade of an existing rooftop site at the Northwood Telephone Exchange (TE) situated on the eastern side of Dene Road to the north of the junction with Green Lane. 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. The building has a utilitarian appearance which reflects its function, and the site is situated within a mixed use residential and commercial area with a high demand for mobile network services. The site is within the Northwood Conservation Area although reasonably well screened from the High Street by adjacent commercial buildings. Situated near a high street which is served by multiple bus routes and an underground station, this is an area that has high demand for mobile data.

2.2 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. It is considered that the least visually intrusive solution has been put forward via the upgrading of an existing site. The proposal will involve the removal of existing antennas and associated ancillary equipment with replacement and new antennas to be installed on the existing roof mounted stub mast on headframe support.

2.3 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.

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 installation of x3 no. replacement and 3 no. new antenna and ancillary equipment including x1 no. 0.3m and x1 no. 0.6m satelite link dishes and x1 no. GPS node at new and existing steelwork to existing rooftop mast
- Alterations to equipment cabinets.
- 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.

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.

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 in the Code of Practice.

4.2 The pre-application consultation in relation to the application site was undertaken with your Authority and Ward Councillors (Cllrs Higgins and Lewis). We also wrote to the residents in immediate proximity. This was undertaken in December 2022 and again in September 2023 following changes to the scheme. A comment from a resident was received following original consultation relating to TV reception and screening. This comment and response is included. We have no further comments to this pre-submission engagement to date, if any comments are received they will be forwarded.

4.3 In our engagement letter we sought to agree with you the appropriate traffic light rating and associated engagement requirements with the local community. At the time of submission there has been no response from the planning authority to this Pre-Application consultation and accordingly we would be pleased to address any necessary matters within the determination period of the application.

5. PLANNING POLICY

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

- National Policy, especially the National Planning Policy Framework (NPPF)
- The local policy framework set out in the adopted Development Plan;
- The Code of Practice for Wireless Network Development in England.

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

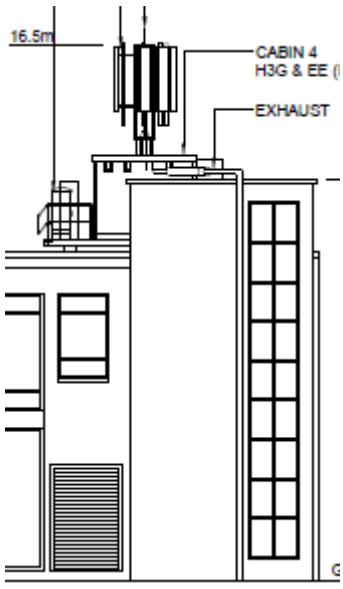
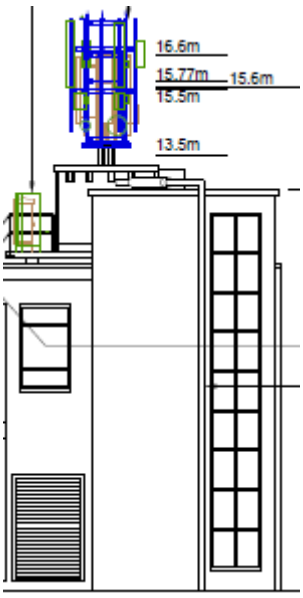
National Support for Modern Communications

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

The Need to Conserve the Historic Environment

5.4 In this case the site falls within the Northwood Conservation Area and as such we provide a Heritage Statement in support.

5.5 The telephone exchange building that hosts the base station is not itself protected but is located within Northwood's conservation area. The exchange building is a two-storey building of approximately 12.4m in height when including the main upper rooftop level with plant room / equipment cabins above. The site benefits from the screening effects associated with the high density of surrounding buildings and a bank of mature trees overlooking the exchange on Dene Road thereby limiting the field of view towards the upgraded equipment. There is further screening from some tree planting on both sides of Dene Road to the north of the site and to the south west on both sides of Green Lane. The visual effects of the proposed upgrade will be limited in comparison to the overall bulk of the host building 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. The upgrade does require new steelwork and a minor height increase to support the new and replacement antenna and to achieve the required coverage but It has been confined to the remit of the existing established mast and its overall appearance against existing is unlikely to be substantially different in the street scene.

	
As Existing	*As Proposed*

5.6 The image below shows where the mast can be viewed from the hight street. The mast was previously upgraded in 2021 which consisted of three additional antennas, three relocated antennas and two transmission dishes. The mast has now become an established and accepted feature of the high street and has not hindered the conservation efforts of Hillingdon Borough Council.

Northwood Telephone Exchange and rooftop mast from Northwood High Street.

Source – Google.

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

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

5.9 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. 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.

5.10 In this instance, the installation of upgraded apparatus on the rooftop of this existing BT Exchange, rather than the introduction of an entirely new and separate base station**,** aligns with this longstanding policy.

5.11 Nonetheless, any potential harm the apparatus would cause to the designated heritage asset must be assessed, as set out in NPPF paragraph 195 and how to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. In this case, all reasonable steps have been taken, through careful siting at an existing Cellnex site, to moderate the visual impact of the development, having regard to technical and operational factors. Accordingly, the proposal looks to conserve the heritage asset.

5.12 In so far as there may be any perceived harm, the development proposal will have less than substantial harm to the significance of a designated heritage asset and as such, this harm has to be weighed against the public benefits of the proposal (paragraph 202). In this respect the base station is required as part of a national 5G mobile communications network, necessary to extend and improve mobile connectivity to the local area and has wider public interests.

5.13 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

5.14 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).

5.15 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.

5.16 Policy SI 6 Digital connectivity infrastructure supports mobile connectivity and the use of rooftops to accommodate mobile digital infrastructure:

5.17 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.

5.18 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.

5.19 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 designed upgrade of an existing shared site housed on the rooftop of the Northwood Telephone Exchange. The proposal is in accordance with this policy as it is considered that the proposed upgrade will not overly intrude into the locality and any associated visual impact will not outweigh the continued need and future demands to provide coverage to the surrounding area.

5.20 The upgrade is for an existing shared rooftop installation and is supported by a declaration of conformity with ICNIRP.

5.21 Further, the proposal which has been minimised as far as possible will not have a substantial additional detrimental effect on the visual amenity, character or appearance

of the building or the local area. This proposal will upgrade the existing apparatus to provide 5G coverage to the local area and a significantly less visually intrusive solution than introducing a new and entirely separate ground-based facility elsewhere in the conservation area.

5.22 In supporting recent upgrades at the rooftop, officers have concluded "*In our view, these will be minor changes to the amount of development visible from relatively few public vantage points within the conservation area, most notably from the relatively open views towards the rear of the telephone exchange from Oaklands Gate. In our view, these changes will have a trivial impact in views within and towards the conservation areas, thereby meeting the objective of preserving its overall character and appearance. The proposal will also avoid any material impact on the setting of buildings included in the National Heritage List and other non-designated heritage assets in the streets near the telephone exchange.*

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 listed in Paragraph 20 of the Code of Practice.

Physical Context

6.2 The scale of the upgraded equipment will be minor in comparison to the overall host building, and are mainly confided to the remit of the existing, established mast. The proposed upgrade utilises an existing stub mast requiring the installation of upgraded and new antenna on new steelwork and associated minor ancillary upgrades. The height and bulk of the equipment has been kept down to the absolute minimum capable of providing the required coverage. The upgrading of a shared existing facility has eliminated the need to provide new and entirely separate additional base stations within the target area.

6.3 Whilst it is acknowledged that there are residential properties within the locality the proposed upgrade site has been carefully selected on a large telephone exchange near to the commercial high street.

Amount Design, Layout and Scale of the Development

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

- **Kept in proportion to the building or structure**

  The scale of the apparatus is not large and when installed should look proportionate to the structure as a whole. The antennas are similar to the existing electronic communications apparatus installed on the building. They

will therefore be seen in the context of this apparatus and will not appear as incongruous or jarring additions to the building or look out of place within the heritage area.

- **Respect architectural style**

  The telephone exchange, although within the heritage asset, was designed to provide local connections to the electronic communications networks and has a utilitarian appearance, more in contrast with other heritage buildings within the area. Mobile phone base stations are a more modern wireless form of telephone exchange, but still require many of the operational attributes present. The development proposed therefore fully reflects the function of the exchange and the apparatus proposed can be viewed as an evolutionary requirement.

  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 elsewhere within the Conservation Area 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.

Antenna Array

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

Equipment Cabinets

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

Access Considerations

6.5 Access to the site will remain from the as existing entrance to the telephone exchange building on Dene Road. 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 apparatus on an existing rooftop means that any attempt to screen it in its entirety would be unrealistic in any event.

6.8 At ground level, particularly along Green Lane which will record the highest footfall, the mast is hidden behind buildings screenings in Oaklands Gate minimising 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 apparatus may be visible they should look straight forward in appearance and reflect its function. Further the proposal is an upgrade to established equipment which are 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 operator has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:

- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Cellnex.
- 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.