

Our ref: AR/P19-0093 (COL.MOD.UK.0003691)

30th October 2025

The Chief Planning Officer
North Herts Council
PO Box 10613
Nottingham
NG6 6DW

Dear Sir/Madam

EE Ltd and Hutchinson 3G UK Ltd

Application for Planning Permission

Installation of electronic communications apparatus at Letchworth ATE_SUB TEC, Nevells Road, Letchworth, Hertfordshire, SG6 4TS (National Grid Reference e: 521600 n: 232800)

On behalf of EE Ltd and H3G UK Ltd, Pegasus Group submit herewith an application for planning permission for the installation of digital communication equipment and ancillary development thereto at Letchworth ATE_SUB TEC. The application site is operated by Cellnex UK, a radio site infrastructure provider.

The application comprises:

1. The written description of development: *"Existing 3No. Antennas at 16.3m to be removed and replaced with 6No. Antennas on proposed steelwork together with the relocation of 3No. Existing Antennas along with ancillary equipment thereto including RRUs, MHAs and GPS Node"*
2. A Site Location Plan showing the location of the site (drg. No. 167674-00-004-MLO04 Rev.4);
3. Payment of the planning application fee (paid via the planning portal);
4. The Developer's contact details provided below;
5. The following drawings:
 - i. Existing Site Plan (drg. no. UKHT001289-00-000-MD030 Rev 30);
 - ii. Site Plan Proposed (drg. no. UKHT001289-02-110-MD030 Rev 30);
 - iii. Equipment Plan Proposed (drg. no. UKHT001289-02-111-MD030 Rev 30);
 - iv. Elevation Existing (drg. no. UKHT001289-00-002-MD030 Rev 30); and
 - v. Elevation Proposed (drg. no. UKHT001289-02-160-MD030 Rev 30).

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6. ICNIRP Certificate.

Site and Surrounding Area

The application site comprises the Letchworth ATE SUB TEC building, a single- to two-storey commercial/industrial facility with associated parking and service areas. The building is set within a mixed-use area, with residential properties to the north along Nevells Road and commercial and retail units to the south, accessed via Station Way and Broadway. The site is partially screened by existing boundary vegetation, including trees and shrubs, which provide visual mitigation from adjacent properties and the nearby railway corridor. In the wider context, the site sits within the urban edge of Letchworth town centre, benefiting from good transport links while being contained by surrounding built development.

The Site is situated with a Conservation Area, with several listed buildings present in the wider context. No ecology or landscape constraints affect the site.

North Herts Council's Online Planning Register outlines the following relevant planning history for the site:

- Planning approved in 2000 conditionally for the erection of one 5m monopole with three cross polar antennas and equipment cabin (LPA Ref: 00/00887/1)
- Planning approved in 2004 for the addition of 3 x 3G antennas to existing monopole (LPA Ref: 04/00852/1EC)
- Planning approved in 2013 for the installation of 2 No. 30cm transmission dishes on the existing rooftop monopole stub-mast with ancillary development including support brackets and feeder cables (LPA Ref: 13/02250/1TD)
- Planning approved in 2022 for the replacement of 3 No. existing antennas located at 16.5m mean height, with 3 No. number antennas at 16.5m mean height on the existing lattice mast, and ancillary development on the rooftop of Letchworth ATE (LPA Ref: 22/00909/EC)
- Planning approved in May 2025 for 25/00555/FP for the installation of 3 No. replacement antenna and ancillary radio equipment onto new and existing support poles at existing rooftop site and ancillary development thereto.

The Proposal

The development proposed is shown in detail in the drawings submission and is for the upgrade of an existing telecommunications installation.

Unlike earlier generations of mobile connectivity, upgraded coverage 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.



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

The application site has been selected by the operator as this will provide the required level of 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.

Prior Engagement

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

In this case the proposal involves the shared use of an existing electronic communications site consistent with longstanding planning policy. As an acceptable form of development can be brought forward as explained further within this covering letter, then formal pre-application engagement with the LPA was deemed unnecessary. However, if you do have detailed comments to make on the proposals we should be pleased to discuss these with you at an early stage in the determination of this application.

Planning Policy

There is significant UK Government support for the delivery of upgraded coverage, 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. It is essential that the planning system looks to support and facilitate upgraded base station installations such as that proposed to meet the Government's Digital Strategy. In addition, modern connectivity will be essential to help the Government meet its wider sustainability and climate change targets. Section 10 of the NPPF provides support for high quality digital communications and says the number of radio and electronic communications sites should be kept to a minimum. The applicant has sought to achieve this by proposing the upgrade of an existing site rather than progressing a new site elsewhere in the surrounds.

The adopted development plan comprises the North Hertfordshire Local Plan 2001–2031 (Adopted November 2022). Policy SP1 relates to Sustainable Development and states the following:

This Plan supports the principles of sustainable development within North Hertfordshire. We will:

- a) Maintain the role of key settlements within and adjoining the District as the main focus for housing, employment and new development making use of previously developed land where possible;*

- b) Ensure the long-term vitality of the District's villages by supporting growth which provides opportunities for existing and new residents and sustains key facilities;*
- c) Grant planning permission for proposals that, individually or cumulatively:*
 - i. deliver an appropriate mix of homes, jobs and facilities that contribute towards the targets and aspirations in this Plan;*
 - ii. create high-quality developments that respect and improve their surroundings and provide opportunities for healthy lifestyle choices;*
 - iii. provide the necessary infrastructure required to support an increasing population;*
 - iv. protect key elements of North Hertfordshire's environment including biodiversity, important landscapes, heritage assets and green infrastructure (including the water environment); and*
 - v. secure any necessary mitigation measures that reduce the impact of development, including on climate change; and*
- d) Support neighbourhood plans and other local planning initiatives where they are in general conformity with the strategic policies of this Local Plan.*

Policy D1 relates to Sustainable Design and states the following:

Planning permission will be granted provided that development proposals:

- a) Respond positively to the site's local context;*
- b) Take all reasonable opportunities, consistent with the nature and scale of the scheme, to:*
 - i. create or enhance public realm;*
 - ii. optimise the potential of the site by incorporating Sustainable Drainage Systems (SuDS);*
 - iii. reduce energy consumption and waste;*
 - iv. retain existing vegetation and propose appropriate new planting;*
 - v. maximise accessibility, legibility and physical and social connectivity both internally and with neighbouring areas;*

- vi. *future proof for changes in technology and lifestyle;*
- vii. *design-out opportunities for crime and anti-social behaviour; and*
- viii. *minimise the visual impact of street furniture and parking provision;*
- c) *Have regard to the Design SPD, and any other relevant guidance;*
- d) *Within Letchworth Garden City have regard to the Letchworth Garden City Design Principles contained in Appendix 5; and*
- e) *For residential schemes, meet or exceed the nationally described space standards and optional water efficiency standards.*

Policy HE1 relates to Designated Heritage Assets and states the following:

Planning applications relating to Designated heritage Assets or their setting shall be accompanied by a Heritage Assessment/Justification Statement that:

- i. *Assesses the significance of heritage assets, including their setting;*
- ii. *Justifies and details the impacts of any proposal upon the significance of the designated heritage asset(s); and*
- iii. *Informs any necessary measures to minimise or mitigate against any identified harms.*

Planning permission for development proposals affecting Designated Heritage Assets or their setting will be granted where they (as applicable):

- a) *Enable the heritage asset to be used in a manner that secures its conservation and preserves its significance;*
- b) *Incorporate a palette of materials that make a positive contribution to local character or distinctiveness, where it is appropriate and justified; and*
- c) *Will lead to less than substantial harm to the significance of the designated heritage asset, and this harm is outweighed by the public benefits of the development, including securing the asset's optimum viable use.*

Where substantial harm to, or loss of significance, of a designated heritage asset is proposed the Council shall refuse consent unless it can be demonstrated that the scheme is necessary to deliver considerable public benefits that outweigh the harm or loss.

Policy Assessment

The development supports the principles of sustainable development as set out in the North Hertfordshire Local Plan by making efficient use of an existing telecommunications site within the built-up area of Letchworth, one of the District's key settlements. The upgrade will enhance local digital connectivity, contributing to economic activity and supporting local residents and businesses. The proposal involves limited visual change to the existing installation, with the additional apparatus being modest in scale and sympathetically designed to minimise visual impact. Although the site is located within a conservation area, the works will not materially harm its character or appearance given the utilitarian nature of the host building and existing telecommunications presence.

The proposed upgrade of telecommunications equipment at the Letchworth ATE site has been designed to respond appropriately to its local context and to minimise visual impact within the surrounding Conservation Area. The works will be confined to the existing building and its rooftop, maintaining the established appearance and scale of existing installations while ensuring continuity of essential digital infrastructure. The proposal makes efficient use of an existing developed site and does not require additional ground works or hardstanding, thereby avoiding any loss of vegetation or open space. The upgraded equipment will enhance technological resilience and future-proof connectivity, consistent with modern communication needs.

The application site lies within the Letchworth Conservation Area, a designated heritage asset. The proposal seeks to upgrade existing rooftop telecommunications equipment through the replacement and relocation of antennas and associated apparatus. The proposal has been carefully designed to ensure that there is no harm to the significance of the Conservation Area. The works will be confined to the roof of the existing ATE building, which is a functional and utilitarian structure that already accommodates telecommunications equipment. The proposed additions will remain modest in scale, and the design and materials will be consistent with the existing installation, ensuring they do not detract from the surrounding townscape. As such, the proposal will result in no harm on the character and appearance of the Conservation Area, causing no harm to its overall significance. The upgrade will deliver clear public benefits through the provision of improved telecommunications services, which outweigh any perceived visual effects. The development therefore accords with the objectives of the heritage policy by preserving the significance of the designated heritage asset while facilitating essential infrastructure improvements.

Health and Safety

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.

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.



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.

Ecology

The site relates to an existing telecommunications base station on the rooftop area of an existing building. It does not feature any priority habitat and there is no on-site habitat that might be affected. The proposal is therefore except from the requirement to provide Biodiversity Net Gain.

Developer's Contact Details

All correspondence and queries relating the determination of this application should be submitted to the undersigned.

However, the developers contact details are:

For EE Ltd:

EE Ltd, Mobile Campus, Hatfield Business Park, Mosquito Way, Hatfield, AL10 9BW

For H3G UK Ltd:

H3G UK Ltd, Star House, 20 Grenfell Road, Maidenhead, SL6 1EH

This letter and the enclosures also provide due notification, as may be required, under the relevant conditions of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended. In particular, you are given notice of the intention to install the electronic communications apparatus described in more detail in the application documentation (including the scale drawings) and to be located as shown on the application plans. We indicated in our prior engagement letter that the Traffic Light Rating was green.

We trust everything is in order, but if you do require any further information or clarification, please do not hesitate to contact me using the contact details provided below.

Yours faithfully



Archie Roberts
Planner

e-mail: archie.roberts@pegasusgroup.co.uk
(for and on behalf of EE Ltd and H3G UK Ltd)