

Town Planning and Heritage Statement

**Upgrade of Electronic Communications Base Station
5G Electronic Communications Base Station**

At the Existing Cellnex Site / BT Telephone Exchange

**Letchworth ATE_SUB TEC, Nevells Road, Letchworth,
Hertfordshire, SG6 4TS (NGR E: 521600 N: 232800)**

**Site Reference: COL.MOD.UK.0001495
Cellnex and CTIL**

February 2025

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 Cornerstone Telecommunications Infrastructure Ltd (CTIL) in conjunction with Vodafone Ltd and Virgin Media O2 Ltd. 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 an upgrade to an existing telecommunications base station on the rooftop of the Letchworth Telephone Exchange, located at the junction of Bridge Road and Nevells Road. The surrounding area comprises a mix of commercial and residential uses. To the north is Letchworth Police Station, to the south is the rail line and Letchworth town centre offering extensive retail amenities and key transport links including Letchworth Garden City Train Station. Commercial offices are situated to the west, and residential areas to the east are separated by the telephone exchange's service yard and mature tree cover. The established rooftop structure, strategically located north of the town centre and close to a main transport hub, ensures effective service while minimising visual impact.
- 2.2 The proposal, is for an upgrade to facilitate essential new 5G coverage at this central location and involves the installation of replacement antenna and ancillary equipment onto new and existing steelwork. The appearance of the base station will not substantially differ from what is existing and established at the site.

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 MNO's existing 3G and 4G networks already existing at the application site. As such, the application site is likely to carry different mobile connectivity services in parallel, with high data uses operating through the new 5G higher capacity network apparatus subject of this application.
- 3.2 Unlike earlier generations of mobile connectivity, 5G has more significant technical and operational requirements and this has implications on the amount, height, position and design of the new base station apparatus on the rooftop of the building. To help explain this important detail, we have set this out in the accompanying **"5G Technical Support"** document, which must be read in conjunction with this planning statement.
- 3.3 The principal elements of the proposed development at the application site reflect these various siting and design factors within the technical support document:
- The removal of 3 no. replacement antenna and ancillary radio equipment onto new and existing support poles at existing rooftop site.
 - The installation of cabling and associated development.
 - Ancillary development thereto.
- 3.4 The established existing 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.

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. In view of the minor nature of the upgrade the proposal received 'green' when assessed against the traffic light rating model as referenced the Code of Practice, and we have written to local ward councillors. No comments or concerns have been received, should any comments, be received they will be passed on.
- 4.2 In our engagement letter we sought to agree with you the appropriate traffic light rating and associated engagement requirements with the local community 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. We have written to the ward councillors in advance of this submission and have not received any comments or concerns.

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;
- Conservation Area Character Appraisal
- The Code of Practice on Wireless Network Development in England

5.2 From these documents it 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 Letchworth Conservation Area and as such we provide a Heritage Statement in support.

Heritage Statement

- 5.5 The Telephone Exchange building that hosts the equipment is not itself protected but is within the Letchworth Conservation Area. The building is accessed from Nevells Road, north of the town centre in an area of mixed commercial and residential use. The rooftop equipment mast is largely obscured from views along the western and southern elevations of Bridge Street due to the mature trees that line the perimeter of the telephone exchange building and railway line. Where it is visible from the residential areas, it appears within the context of its nearby town centre location and is an established feature. The appearance of the mast will not change in appearance substantially.



Southwestern elevation of site from Bridge Road (Source: Google Maps).



Northwestern elevation of site from Bridge Road (Google Maps)

- 5.6 The proposed upgrade is the least visually intrusive solution available and has been carefully sited and designed to respect the aesthetics of the sensitive surrounding area and represents the least visually intrusive solution rather than seeking an alternative site in the area.
- 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 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 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.
- 5.9 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 apparatus at this existing site owned or managed by Cellnex, where there are existing operations 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 207-221 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 215). 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. The target coverage area falls within the designated area and the special operational and technical requirements necessitate siting of new apparatus within it.
- 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 North Hertfordshire Local Plan 2011-2031 adopted in November 2022.
- 5.15 Although the document does not include a specific policy on telecommunications, Policy SP7: Infrastructure Requirements and Developer Contributions emphasises that *“The nature of planned growth in the District is such that new facilities and infrastructure will be required.”*
- 5.16 The proposal fully aligns with National Policy and supports the aspirations of the Local Plan to strengthen the local economy by enhancing mobile connectivity. By utilising an existing site with an established telecommunications presence, the scheme eliminates the need for additional infrastructure elsewhere, in line with National Policy guidance regarding site sharing and reducing environmental impact. The replacement antennas are positioned on the rooftop ensuring minimal visibility from key viewpoints along Bridge Road and towards the town centre with adjacent tree coverage providing further screening. The design integrates with the building’s existing use as a base station and does not alter its external appearance. While some visibility of the antennas will occur from the east and north, this is limited and viewed within the context of the urban town

centre. The impact on the character and amenity of the conservation area is minimal and ensures that the infrastructure remains well-integrated into its surroundings.

- 5.17 We have demonstrated that the proposal, which involves upgrades to an existing, established site, will not result in a significant additional visual impact and has been designed to minimise its impact upon the conservation area representing the best available scheme, and that the upgrade of the existing site is preferable to a new rooftop or ground based mast elsewhere in the conservation area.
- 5.18 The proposed development is 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

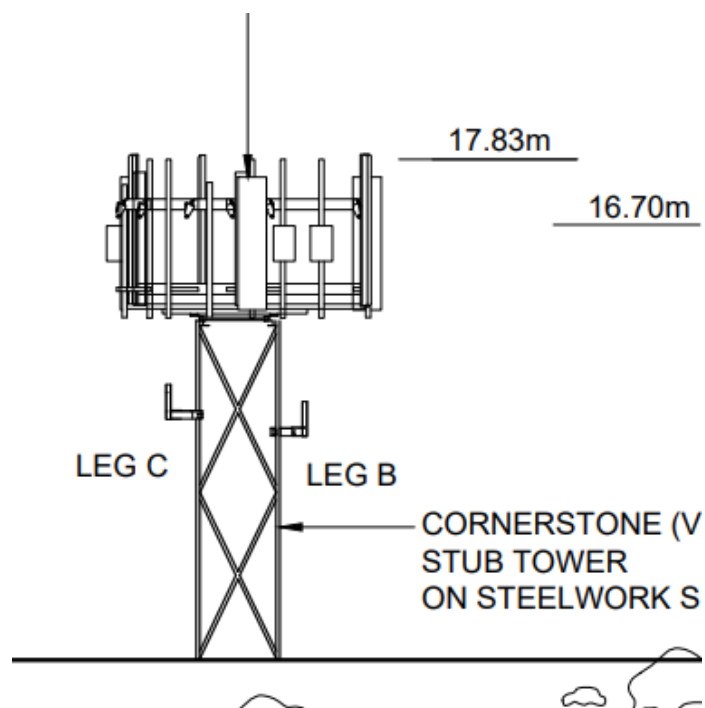
- 6.2 The application site currently accommodates an existing base station within a mixed-use area. The site is set back from the town centre's main area of activity and the proposed upgrades have been designed to have minimal impact over the existing appearance. The site's position enables it to effectively serve the designated central commercial areas. The upgrading of an existing facility has eliminated the need to provide new and entirely separate additional base station within the target area and ensures the visual character of the area remains unchanged.

Amount, Design, Layout and Scale of the Development

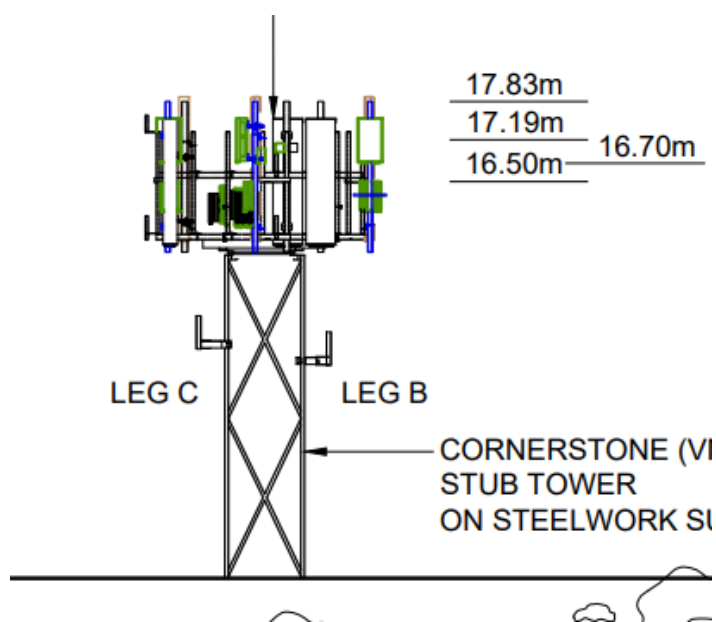
- 6.3 The scale, layout and design of the development has been guided by the special 5G technical and operational factors affecting the need to provide coverage to the local area, having regard to the need to minimise visual impact. With regard to the main component elements of the development proposed.

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

The scale of the apparatus is minimal, slimline, and when installed should look proportionate to the building as a whole and has been retained within the height of existing apparatus at the site. The new antennas and brackets are similar to the existing electronic communications apparatus installed on the building whilst meeting the special technical and operational requirements of 5G. They will therefore be seen in the context of this apparatus and will not appear as incongruous or jarring additions to the building as established.



As existing



As proposed new steelwork is in blue, antenna in green and removed equipment in brown

- **Respect architectural style**

The telephone exchange, although within the conservation area, was designed to provide local connections to the electronic communications networks and has a utilitarian appearance. 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 as existing, there is not additional increase in height. The impact on the apparatus remains contained and new views towards this apparatus from elsewhere within the Conservation Area remain limited and as existing there is little additional visual impact from the upgrade.

- **Not be detrimental to views and general skyline**

A combination of design and local buildings 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, particularly with the location of the building adjacent to neighbouring buildings.

- **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.

Access Considerations

- 6.4 Access to the site will be as existing and provided from the existing entrance to the Telephone Exchange building via Nevells Road as illustrated on the Location Plan.

- 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.

Appearance

- 6.7 The sensitive approach to siting and design should minimise the appearance of the development proposed which is all contained within the existing headframe and its visual appearance will not change to the casual observer. Insofar as the apparatus may be visible they will remain largely as existing and established and will remain straight forward in appearance and reflect their function.

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.