

Town Planning Statement

Electronic Communications Base Station

at the Existing Cellnex UK Site at

Shoreham ATE, Tarmount Lane, Shoreham-by-Sea, BN43 6DA

Site Reference: COL.MOD.UK.0008240

CELLNEX UK AND MBNL

November 2025

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1. INTRODUCTION

1.1 This statement is submitted in support of an application for planning permission for a 5G mobile base station for the mobile network operator(s) (MNOs) *Hutchison 3G UK Ltd, in conjunction with Mobile Broadband Network Limited (MBNL)*. 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

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2. SITE AND SURROUNDING AREA

- 2.1 This site is an existing rooftop base station located at Shoreham Telephone Exchange. It comprises a three-storey building with existing telecommunications equipment positioned on a rooftop. The building is located within the Shoreham-by-Sea Conservation Area, and within proximity to several listed buildings. As such, careful consideration has been given to the proposed new telecommunications infrastructure to minimise any visual or heritage impact.
- 2.2 The building hosts existing antennas and their associated support structures at rooftop level. The purpose of this application is to install Hutchison 3G UK Ltd antennas in order to improve network coverage and connectivity within the immediate and wider Shoreham area. The site is situated within a mixed-use area comprising both commercial and residential properties.
- 2.3 In April 2024, planning approval (AWDM/0265/24) was given for the installation of 3 no. new antennas and the relocation of 3 no. existing antennas to new support steelwork. The current proposal builds on that consent.
- 2.4 The longstanding presence of telecommunications equipment on the rooftop establishes a clear precedent for its upgrade to ensure continued network reliability and improved service provision. By adding equipment to an existing site, the proposal avoids the need for new infrastructure and helps prevent proliferation of telecoms sites within the Conservation Area.

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3. THE PROPOSAL

- 3.1 The development proposed is shown in detail in the drawings submitted and is for a 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 are;
- *The removal of 2 no. COMMSCOPE CVV65BSX-M antennas and the installation of 2 no. new 800482002 antennas on the approved quadpod;*
 - *The removal of 1 no. COMMSCOPE CVV65BSX-M antenna and the installation of 1 no. new 800482002 antenna on the northwest elevation;*
 - *Replacement of 1 no. existing cabinet with 1 no. new cabinet;*
 - *Installation of remote radio units (RRUs) break out boxes (BOBs), combiners and GPS node;*
 - *Removal of existing mast head amplifiers (MHAs);*
 - *Associated apparatus and ancillary works.*
- 3.3 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.

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- 3.4 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 and the anticipated use of existing sites, including those owned by radio site infrastructure providers like Cellnex UK.
- 3.5 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 operated by Cellnex UK.

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4. PRIOR ENGAGEMENT

- 4.1 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. The proposal received a green rating when assessed against the traffic light rating model as referenced in the Code of Practice.
- 4.2 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 statement, then formal pre-application engagement with the LPA was deemed unnecessary. However, if you do have detailed comments to make on the proposals we should be pleased to discuss these with you at an early stage in the determination of this application.
- 4.3 Our best practice engagement with the local community entailed consultation with the St Mary's Ward Councillors. No correspondence has been received to date.

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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 – Adur Local Plan 2017;
- Shoreham-by-Sea Conservation Area Character Appraisal & Management Strategy
- Heritage Statement;
- 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 Shoreham-by-Sea Conservation Area, as such we provide a Heritage Statement in support.

Heritage Statement

- 5.5 The Shoreham-by-Sea Conservation Area was originally designated in May 1971 and later extended in 1993 in recognition of the importance of the riverside setting. The conservation area covers a large area and is centred around the historic built-up core of the town.
- 5.6 The Conservation Area has origins dating back to pre-Roman times. The town and port were established by the Norman conquerors towards the end of the 11th century. Key influences on the later development of New Shoreham include the layout of the medieval streets, some of which survive today; the town's historic relationship with its waterside frontages, the harbour and the River Adur; the construction of the railway to the north of the town centre; and, more recently, the increased volume of coastal traffic passing through the original High Street.
- 5.7 The Shoreham-by-Sea conservation area covers approximately 29 hectares and contains a wide range of building types and uses. As a result, assessing the character of the entire area can be challenging. The original character assessment undertaken in 1971 identified three main character areas. Following the extension of the Conservation Area in 1993, additional character areas were subsequently defined.
- 5.8 The primary landmark within the Conservation Area is the Grade I Listed Church of St. Mary de Haura. The church is most prominently viewed from the immediately adjacent streets, although its tower is visible from various points within the Conservation Area. The Conservation Area Appraisal recognises that protection of the landmark is a key issue in considering applications for new development.

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- 5.9 The existing base station is located within the character area designated as 'The Shopping Areas'. This part of the Conservation Area is recognised as a busy commercial environment with significant traffic activity and on-street parking. This area comprises a mix of architectural styles and scales. Within this context, the upgrading of an existing telecommunications site, one that has been present for many years and has become an accepted feature of the townscape, is considered appropriate. The proposed replacement antennas are appropriate given the significant public benefits they will deliver in terms of improved mobile connectivity.
- 5.10 Brunswick Road, along with High Street and East Street, is recognised to be at the heart of Shoreham's commercial activity. Retail is the most prevalent use within these streets, which accommodate a variety of shops and eating places. Interspersed with these retail uses are other services such as estate agents and personal care services. The Adur District Retail Study (March 2006) noted that Shoreham has a vital and viable town centre.
- 5.11 Transport is also recognised as an important use within the Conservation Area. It contains major road and rail links, including the A259 and Shoreham-by Sea railway station, which provides regular, direct links to Brighton, London and Portsmouth. The River Adur offers opportunities for waterborne transport also. In the context of the land uses and major transport links, it is vital that these local land uses and transport hubs are supported by modern mobile services to ensure continued opportunities for growth and development.
- 5.12 The historic importance of the Shoreham-by-Sea Conservation Area is fully acknowledged. The proposed works are modest in scale and will result in only a minimal visual impact on both the immediate and wider surroundings. Although the replacement antennas will be visible from ground level, they do not introduce any change that would alter the visual appearance of the previously approved quadpod. Given that the proposed works are located to the rear of the telephone exchange and the change from application AWDM/0265/24 is negligible, it is not considered to have a harmful impact on the heritage asset. As such, the proposals are not considered to result in any detrimental effect on the character or appearance of the Conservation Area. This conclusion is consistent with the principle of telecommunications

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development within the Conservation Area, which has previously been assessed and deemed acceptable.

- 5.13 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 a Conservation Area, is balanced by the need to conserve or enhance their heritage qualities.
- 5.14 In considering the development proposal, a key consideration is the balance of preserving the heritage asset with the need to maintain and enhance existing electronic communications infrastructure, ensuring that Shoreham continues to be adequately served by reliable network services.
- 5.15 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.
- 5.16 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.
- 5.17 In this instance, the installation of apparatus at the existing site managed by Cellnex UK, where operations are already established, aligns fully with this longstanding policy approach. Nonetheless, any potential harm the apparatus might cause to designated heritage assets must still be assessed, as required by paragraph 201 of the NPPF, including how to avoid or minimise conflict between their conservation and any aspect

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of the proposal. In this case, all reasonable steps have been taken—through careful siting at an existing Cellnex UK site—to moderate the visual impact of the development, having regard to technical and operational factors. Accordingly, the proposal seeks to conserve the heritage asset.

- 5.18 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 208). In this respect the base station is required as part of a national mobile communications network, necessary to extend and improve mobile connectivity to the local area and has wider public interests. As explained, the target coverage area falls within the designated area and the special operational and technical requirements necessitate siting of new apparatus within it.
- 5.19 It should also be recognised that the presence of telecoms apparatus has been a long-term feature of the locality but by no means a defining character, particularly when viewing the asset as a whole. This proposal should not change the situation. It is reasonable to conclude that the visual changes at the site would result in 'less than substantial harm' to the heritage asset and that there are clear 'public benefits' which the upgraded base-station would deliver. It is asserted that these benefits would arguably outweigh any deemed harm.
- 5.20 The proposed upgrade of this mobile base-station would provide enhanced communication services and connectivity for surrounding businesses and local residents. The proposal would deliver the Government's objective of the public having access to a choice of high-quality electronic communications services. The improved connectivity would also help to strengthen Shoreham's digital economy, innovation and productivity.
- 5.21 Building on these benefits, the proposal achieves an appropriate balance between conserving the character and appearance of the Conservation Area and delivering essential digital infrastructure to support Shoreham's continued growth. This statement demonstrates that the proposal would result in only a moderate degree of visual change, and any limited harm would be outweighed by the considerable public,

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economic, and social benefits. On balance, the proposal should therefore be supported.

Local Policy Considerations

- 5.22 At local level, the proposal has been considered against Adur Local Plan, adopted December 2017. The Local Plan recognises that 'the ways in which people shop, work and communicate have changed in recent years' and anticipates further technology changes throughout the lifetime of the plan.
- 5.23 Policy 37: Telecommunications is relevant to this proposal. This policy is supportive of the expansion of electronic communication networks, provided site sharing has been explored, and no satisfactory alternatives are available. The current proposal seeks to upgrade an existing and established base station. The policy further advises that all proposals for telecommunications development should ensure an acceptable visual impact. It should be noted that the existing apparatus forms part of a well-established site, and the proposed apparatus is similar in form and shape to that approved under application AWD/0265/24. In accordance with this policy, an ICNIRP certificate accompanies this application.
- 5.24 Policy 16: A Strategic Approach to the Historic Environment and Policy 17: The Historic Environment both seek to conserve and enhance the historic environment. The proposed development is minor in scale. The replacement antennas would be sited towards the rear of the building and at a reasonable distance from the Listed Church, and are therefore not considered to have a detrimental impact on the special character of the Conservation Area.
- 5.25 The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operator and minimising environmental impact.
- 5.26 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

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acceptable and that in accordance with the presumption in favour, planning permission should be granted.

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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 proposed upgrade site has been carefully selected to provide the required coverage within the Shoreham-by-Sea target area. The apparatus is similar in scale to the existing and previously approved equipment and is modest compared to the overall bulk of the host building.

Amount, Design, Layout and Scale of the Development

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

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

The apparatus is modest in scale and, once installed, will appear proportionate to the overall structure. The antennas are similar to the existing and approved telecommunications equipment on the building and will be installed at a similar height. As a result, they will be viewed in the context of the existing apparatus and will not appear incongruous within the heritage area.

- **Respect architectural style**

Within the severe technical constraints, the apparatus shall be installed in a manner that respects architectural. Architecture and its style are about function as well as pure design. The existing, 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

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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 antennas and the apparatus proposed can be viewed as an evolutionary requirement. In similar fashion, for example, a railway station, i.e. development required for another form of communications, which now may form part of our built heritage still has to evolve in accordance with new technology and safety requirements. In turn these translate into an array of structures that were often never envisaged when first built and now common within urban environments including those that may be designated for their heritage interest.

- **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. 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 focussed 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 common installations on rooftops.

Antenna Array

- The numbers of antennas and their size has been kept to the minimum necessary to provide 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 cabinet, and the electronic communications equipment housed within them, reflects their functionality.

Access Considerations

- 6.4 Access to the site will be provided from Tarmount Lane.
- 6.5 Once constructed, the development will be unmanned 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. In addition, as indicated above the local topography and natural features should help minimise views. Insofar as the apparatus may be visible, it should look straight forward in appearance and reflect its function. To that extent it 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.

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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.

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8. SUMMARY AND CONCLUSIONS

- 8.1 In summary, the application is in respect of an 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. In the UK there are now more than 111 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 UK.
 - 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 Practice procedures.
 - An examination of design options to try and minimise potential visual impact.
- 8.5 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.

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- 8.6 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.
- 8.7 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.

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