

STATEMENT IN SUPPORT OF APPLICATION FOR PRIOR APPROVAL INCORPORATING THE DESIGN AND ACCESS STATEMENT

Site Reference ANW_PE154

Arqiva Limited

18/07/2021

1. INTRODUCTION

- 1.1. This statement is submitted in support of the application made in respect of development proposed on the grassed verge on the western side of Spalding Road to the east of King Street at Kirton, Boston, Lincolnshire, PE20 1HX as part of Anglian Water's Smart Meter Network.
- 1.2. As shown in detail in the drawings submitted, the development proposes the installation of a very slim-line radio mast, 12 metres high (antenna centre-line mean height 13.83m), with a small and unobtrusive antenna configuration at the top, which has been well designed to blend into the existing street scene. The mast, therefore, is similar in appearance to other forms of street furniture that are typically located within many small rural and semi-rural villages such as street lighting columns, although in this case a need to be taller to provide the necessary radio coverage to premises within the settlement. A small equipment cabinet is also proposed at ground level and again, will not be dissimilar to similar utility street apparatus such as those used by BT to provide broadband connectivity.
- 1.3. Arqiva is an Electronic Communications Code Operator and so benefits from the right set out in Paragraph 9 of the Electronic Communications Code to carry out street works. The Electronic Communications Code is found at Schedule 2 of the Telecommunications Act 1984, as amended. Arqiva also benefits from the permitted development rights set out under Part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. Hence in this case, the application is made under the Prior Approval procedures set out under Conditions A.2 and A.3 of Part 16.
- 1.4. This statement includes:
 - A description of the site and surrounding area
 - A description of the proposed development

- An explanation of how the proposed siting and design of the development accords with National and Local Planning policies
- A summary of the design and access considerations that have informed the proposed layout of the development.
- 1.5. In this statement, which incorporates the design and access statement, we go on to highlight the role of the development proposed, to explain the particular need in this case and to demonstrate compliance with planning policy. We also provide information on health and safety and related issues by way of further reassurance.

2. THE PURPOSE AND BENEFITS OF THE SMART METER NETWORK

2.1. The development proposed forms part of Arqiva's planned smart water metering network for Anglian Water. Anglian Water is the UK's largest water and wastewater services provider by geographic area with more than six million domestic and business customers in the east of England and Hartlepool. Anglian Water's 'Our Plan 2020-2025' includes the rollout of Smart Meters as a central component of its Water Management Plan. Table 6 on page 64 of the document includes the following statement:

"...We are installing smart meters across our region to enable a step change in our customer communications, supporting our water efficiency initiatives. The Smart metering programme also has significant benefits for optimising our networks and supporting the delivery of our leakage strategy..."

- 2.2. As part of this initiative, Arqiva will build and operate the smart water metering network for Anglian Water drawing upon our experience in delivering smart metering networks for gas and electricity operators in the north of England and Scotland, and for Thames Water in London.
- 2.3. In summary, the major benefits of smart metering will be:
 - More efficient operation: with faster leak detection and repair; better fault finding; greater network visibility; enhanced supply/demand planning; and better capital investment/maintenance targeting
 - Better customer service: providing customers with clear, detailed information on their water usage and consumption patterns, enabling them to adjust their behaviour to save water, energy and money
 - Environmental protection: lower consumption and reduced leakage enable reduced abstraction; this in turn cuts carbon emissions from water treatment and distribution processes
 - Improved water resilience: reduced danger of demand outstripping supply

- A platform for more frequent and better-quality engagement with Anglian Water customers on water efficiency offers, bespoke advice and tools for reducing consumption and bills – both water and energy – benefiting water and fuel poverty agendas.
- 2.4. In order to provide radio coverage for the smart water radio network, electronic communications base stations will need to be installed across Anglian Water supply areas, hence the development proposed in Kirton.

3. THE REQUIREMENT

- 3.1. Arqiva is licensed by Ofcom, the independent regulation of the UK's communications industries, to use the 412-414MHz spectrum for the development of smart metering networks. The proposed base station will operate in this frequency range, which is the same as that being used in northern England and Scotland as part of our smart metering programme for the gas and electricity companies, and in London for Thames Water's smart metering network.
- 3.2. As the network must be able to communicate with meters that are typically found in a boundary box buried in the ground at a property, or in the footpath, the base stations must be located so that they can provide an acceptable level of coverage to the properties they serve.
- 3.3. Arqiva also owns and operates the terrestrial radio and television broadcast networks and basing the smart water metering radio network on this portfolio of existing sites will be a critical element in minimising the potential visual impact associated with the deployment of a new base station infrastructure. This is also consistent with longstanding statutory and government planning policy requirements to use existing telecommunications sites, tall buildings or other high structures to minimise visual impact.
- 3.4. These main installations provide the main umbrella of coverage to larger geographical areas and premises within those areas. However, there are still smaller settlements, peripheral areas and more remote locations that cannot be met by these main installations due to coverage constraints, often related to distance, topography or other environmental related factors. Hence, in order to provide more localised coverage to these areas, a secondary layer of smaller sites are required and these are generally physically smaller. The application is in relation to a site required for this secondary layer as explained in more detail below.

Site Selection

- 3.5. The micro and repeater sites are required to provide localised indoor coverage over very specific areas and so the siting parameters for coverage reasons are narrow.
- 3.6. The sites must also satisfy a range of operational criteria, such as good fibre connectivity, an existing power supply suitably high and resilient for an electronic communications network, a reasonable level of security, vehicular or pedestrian access for ongoing maintenance and security of tenure for the life of the SMN contract. In addition, the site must be capable of being constructed without undue constraints and avoiding undue environmental disturbance, that for example, might be associated with creating new access tracks and supplying new power runs above or below ground.
- 3.7. In assessing these various requirements and looking to find an appropriate balance between operational and environmental factors, a sequential approach to site selection has been adopted. Site sharing, utilisation of existing buildings and structures have been explored to best meet the operational need whilst minimising environmental impact.
- 3.8. The following sites were investigated as possible opportunities for meeting the specific localised coverage needs to the settlement but were found to be either unsuitable and/or unavailable or comparably no better than the chosen site.

Site Name and address	National Grid Reference	Reason for not choosing
D1	E: 531018, N: 338391	This option was discounted from a coverage perspective as the site that has
Greenfield Monopole at		been put forward is better placed for
Graves Park Social Club		providing the required coverage due to
		being situated closer to the cell centre.
D2	E: 530890,	This option was discounted from a build
	N: 338337	perspective due to challenging traffic
Streetworks Monopole at		management adjacent to a pedestrian

Verge at A16 Spalding Road		crossing and due to being closer to the views of residential properties than the option that has been put forward.
D3 Rooftop Installation at Kirton Fire Station Tower	E: 530761, N: 338420	This option was discounted from a build perspective due to the tower being congested with existing telecoms equipment and from a planning perspective due to being closer to the Conservation Area than the option that has been put forward.
D4 Rooftop Installation at Kirton BT Exchange	E: 530584, N: 338452	This option was discounted from a planning perspective due to being situated within the Conservation Area and closer to the views of residential properties than the option that has been put forward.
D5 Streetworks Monopole at Verge at A16 Spalding Road	E: 530994, N: 338528	Wide grassed verge well placed from a planning perspective discounted from a coverage standpoint due to being situated in excess of 350m from the nominal location.
D6 Site Share at TEF 74638 Lattice Tower	E: 531075, N: 338219	Discounted from a coverage perspective due to being situated further away from the properties requiring coverage than the option that has been put forward and from a build perspective as a tower extension or replacement would be required to achieve the required separation distance above the existing antennas.
D7 Streetworks Monopole at Verge at Wash Road	E: 531026, N: 338092	Discounted from a build perspective due to the relatively narrow width of the extent of adopted highway leaving insufficient space for housing the necessary equipment without causing visibility splay issues at the adjacent junction.
D8 Streetworks Monopole at Pavement at A16 Spalding Road	E: 530916, N: 338376	Wide area of pavement but no evidence of a BT connection within the island area therefore likely to require traffic disruption in order to establish a connection. It was also noted that the berthing of a HIAB at this location during construction would cause significant disruption at a busy road junction.
D9 Streetworks Monopole at Verge at A16 Spalding Road D10	E: 530579, N: 337639 E: 530846, N: 338174	Discounted from a coverage perspective due to being situated in excess of 600m from the nominal and due to issues with overhead power lines. Discounted from a build perspective due to the verge being congested with

Streetworks Monopole at Verge at A16 Spalding Road		underground services.
D11	E: 530903,	Discounted from a coverage perspective
Streetworks Monopole at Verge at A16 Spalding Road	N: 338382	due to being situated further to the north of the cell centre than the option that has been put forward and due to challenging traffic management during construction and maintenance adjacent to a busy road junction.
D12	E: 530958,	Wide grassed verge well placed from a
Streetworks Monopole at Verge at A16 Spalding Road	N: 338465	planning perspective. discounted from a coverage standpoint due to being situated further to the north of the cell centre than the option that has been put forward.

- 3.9. The proposed installation at Kirton will be well located and sufficiently close to the premises that the SMN will serve, particularly as the mast will operate as a communications hub, both transmitting radio signals but also with the need to collect data from smart meters installed within premises. The proposed development at the site seeks to ensure the height and mass of the design is sympathetic to its surrounds, having been specified with narrowest profile and minimum height capable of delivering the required coverage. The proposed siting and design have been specified to maintain and preserve the location's character whilst delivering the level of service needed in this location. It is therefore considered that the proposed development would accord with the principles of the Development Plan policies.
- 3.10. To help illustrate this in the context of this application, a coverage plot is provided. This tends to exaggerate true levels of coverage on the ground, because the modelling only takes into broad account general topography and manmade features. However, they are a useful tool for explaining how the new installation will fit into the SMN planned and being implemented in the wider area.
- 3.11. Our conclusion is that the best balance between environmental and operational considerations is provided by using a specially designed structure at the application site, sufficiently close to / set amongst the properties that need to be served. This is the reason for the application before you.

4. PRE-APPLICATION ENGAGEMENT

4.1. The recently National Planning Policy Framework (NPPF) and the Code of Best Practice on Mobile Network Development in England, which Arqiva uses for all relevant projects, require a consultative approach to network development with the planning authority and local community. In this case, pre-application consultation for the application site was undertaken with your Authority and Ward Councillors (David Brown, Peter Watson and Nigel Welton), Kirton Parish Council (Belinda Buttery - The Parish Clerk) and the Thomas Middlecott Acdemy (Headteacher). At the time of submission there has been no response to this preapplication.

5. COMPLIANCE WITH PLANNING POLICY

- 5.1. The relevant planning policy framework that has been taken into account and in part already alluded to is found principally within:
 - The Development Plan
 - National Planning Policy Framework (NPPF)
 - The Code of Best Practice on Mobile Network Development in England
- 5.2. These documents provide the overall policy background for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development. As this is an application for a prior approval determination, there is no requirement in Part 16 of the GPDO to have regard to the Development Plan in reaching the Council's decision. The following information is provided as it may assist the Council to understand the public benefits, as well as matters related to the siting and appearance, of the development proposed.

The National Planning Policy Context

- 5.3. The general policy context can be summarised as follows:
 - Government policy within the NPPF is to support high quality communications infrastructure and systems – this is especially relevant to smart metering, which is a Government initiative
 - Government policy is to keep the inevitable environmental impact associated with electronic communications development to a minimum
 - The best way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites
 - The starting point for planning new networks or the expansion of existing networks is therefore to use existing electronic communications sites

- Where new installations are required, as in this case, operators should look to develop well designed structures, such as those designed to blend in with the street scene or local setting
- 5.4. The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. The NPPF recognises that this is especially relevant where a development might have other significantly important benefits such as being essential to meet, for example, new nationally important infrastructure such as the Anglian Water SMN.
- 5.5. The importance of the proposed development as part of Anglian Water's SMN is clearly an important material planning consideration as it directly supports sustainability and is also precisely the type of new digital infrastructure that the NPPF is seeking to support.
- 5.6. The development proposed is comparatively small scale, well sited and well designed and so should be acceptable in every respect. However, for completeness we still highlight some of the key points within the NPPF as they help demonstrate why the application should be permitted:
 - a. Paragraph 14 advises that authorities should:
 - positively seek opportunities to meet the development needs of their area [as part of plan making];
 - meet objectively assessed needs unless the adverse effects would "significantly and demonstrably outweigh the benefits";
 - b. Paragraph 17 advises that planning should "proactively drive and support sustainable development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs" [our emphasis];

- c. Paragraph 187, on "decision-taking" states that authorities should "look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible".
- 5.7. Paragraph 14 of the NPPF further states that the presumption in favour of sustainable development lies at the heart of the planning system and, in respect of decision-taking, this means that both the South East Lincolnshire Local Plan 2011-2036 (adopted 8th March 2019) and the NPPF are relevant development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully with all relevant Development Plan and NPPF policies and, therefore, permission should be granted for the development.

Section 5 - Supporting Advanced Communications Infrastructure of the NPPF

- 5.8. The proposal is supported by, and accords with, the guidance in Section 5 of the NPPF, which provides further guidance on the Government's objective of providing high quality communications networks in England.
- 5.9. The NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this has to include an understanding of the associated special problems and technical needs of developing communications networks such as the Smart Meter network.

Section 7 – Requiring Good Design of the NPPF

5.10. Government places great importance on the design of the built environment and paragraph 56 of the NPPF states that this is an integral objective of achieving

sustainable development. The careful approach taken to the design and siting of the proposed development complies fully with this general policy objective.

5.11. More specifically, the proposal is supported by the guidance in paragraph 65 of the NPPF, which states that:

'Local Planning Authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).'

Water Resources and Climate Change Considerations

- 5.12. Government requires local planning authorities to properly consider the issue of climate change and to support necessary infrastructure central to the economic, socialand environmental dimensions of sustainable development. Paragraph 149 of the NPPF encourages local planning authorities to take *"a proactive approach to mitigating and adapting to climate change"* taking full account of matters such as water supply and demand considerations. This will clearly include the necessary smart water metering radio communications infrastructure for Anglian Water to tackle water use and demand.
- 5.13. Strategic Priority 8 encourages a range of measures to minimise the impact of climate change and promote sustainable development. While these policies do not specifically refer to water supply infrastructure, the provision of Anglian Water's Smart Water Metering Network and smart meters will assist with the delivery of the Council's aspirations to adapt to the impacts of climate change by minimising the use of natural resources within the Borough.
- 5.14. In respect of this guidance, all reasonable steps have been taken through careful siting and design to minimise the visual impact of the development, so far as the

technical and operational constraints allow. The proposal is an acceptable design solution that will not have any material impact on a designated heritage asset.

Site Specific Policies

- 5.15. The South East Lincolnshire Local Plan 2011-2036 was adopted by the South East Lincolnshire Joint Strategic Planning Committee on 8 March 2019.
- 5.16. The site is not included within any particular designations or land allocations that need to be taken into account in addition to South East Lincolnshire Local Plan 2011-2036 Policy 2: Development Management and Policy 3: Design of New Development.

Policy 2: Development Management states:

Proposals requiring planning permission for development will be permitted provided that sustainable development considerations are met, specifically in relation to:

- 1. size, scale, layout, density and impact on the amenity, trees, character and appearance of the area and the relationship to existing development and land uses;
- 2. quality of design and orientation;
- 3. maximising the use of sustainable materials and resources;
- 4. access and vehicle generation levels;
- 5. the capacity of existing community services and infrastructure;
- 6. impact upon neighbouring land uses by reason of noise, odour, disturbance or visual intrusion;
- 7. sustainable drainage and flood risk;

- 8. impact or enhancement for areas of natural habitats and historical buildings and heritage assets; and
- 9. impact on the potential loss of sand and gravel mineral resources.

Policy 3: Design of New Development states:

All development will create distinctive places through the use of high quality and inclusive design and layout and, where appropriate, make innovative use of local traditional styles and materials. Design which is inappropriate to the local area, or which fails to maximise opportunities for improving the character and quality of an area, will not be acceptable.

Development proposals will demonstrate how the following issues, where they are relevant to the proposal, will be secured:

- creating a sense of place by complementing and enhancing designated and non-designated heritage assets; historic street patterns; respecting the density, scale, visual closure, landmarks, views, massing of neighbouring buildings and the surrounding area;
- 2. distinguishing between private and public space;
- 3. the landscape character of the location;
- 4. accessibility by a choice of travel modes including the provision of public transport, public rights of way and cycle ways;
- 5. the provision of facilities for the storage of refuse/recycling bins, storage and/or parking of bicycles and layout of car parking;
- 6. the lighting of public places;
- 7. ensuring public spaces are accessible to all;
- 8. crime prevention and community safety;

- 9. the orientation of buildings on the site to enable the best use of decentralised and renewable low-carbon energy technologies for the lifetime of the development;
- 10. the appropriate treatment of facades to public places, including shop frontages to avoid visual intrusion by advertising, other signage, security shutters, meter boxes and other service and communication infrastructure;
- 11. residential amenity;
- 12. the mitigation of flood risk through flood-resistant and flood-resilient design and sustainable drainage systems (SuDS);
- 13. the use of locally sourced building materials, minimising the use of water and minimising land take, to protect best and most versatile soils;
- 14. the incorporation of existing hedgerows and trees and the provision of appropriate new landscaping to enhance biodiversity, green infrastructure, flood risk mitigation and urban cooling;

15. the appropriate use or reuse of historic buildings.

5.17. In accordance with the emphasis placed by Policy 2 – Development management and Policy 3 – Design of New Development on the importance of protecting amenity, the site has been carefully selected in a position capable of providing the required SMN coverage whilst being situated as far away as possible from the views of residential receptors. The site has been selected on a grassed verge overlooked by commercial development and with only oblique views towards the proposed installation from the windows of the nearest residential properties. The site benefits from the screening effects associated with nearby hedgerow and mature tree planting defining the verge boundary on the western side of Spalding Road.

- 5.18. The site selection process has also been influenced by the numerous vertical elements of street furniture distributed around the vicinity of the site including telegraph poles and street lighting columns that will allow the proposal to assimilate with its surroundings thereby according with the requirement in Policy 2 aspect 6 to minimise visual intrusion.
- 5.19. In line with Policy 2 aspect 4's requirement to consider access arrangments the site has been selected on a wide grassed verge away from any pavement areas in a position that will avoid impeding pedestrian flow.
- 5.20. The proposed design of the installation at the site is required to deliver the requisite level of electronic communication service yet would be seen in the context of the nearby vertical elements of street furniture and seeks to minimise its visual impact in this location. The change will not appear as incongruous and would assimilate with its surrounds and would not appear out of context in this location, so according with wider Development Plan policy. As such it is considered the proposed development would accord with the principles of the Development Plan policies.
- 5.21. In summary, the sensitive way the development proposed has been conceived and brought forward accords with best practice and forms part of a national important infrastructure project to provide smart metering services to the local area. It accords with the key policy objectives at national level, which are reflected in the relevant policies at local level. The development proposed is, therefore, acceptable in principle and also accords with the more detailed guidance expressed in local policy.

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. However, to assist your determination this section provides a description of the process adopted in the design of the proposals and explains the access considerations. The significant contribution such development makes towards sustainable development objectives have already been outlined earlier.

Physical Context

- 6.2. The proposed site is situated on a grassed verge on the western side of the A16 Spalding Road in Kirton. The proposed installation is an ultra slim line streetworks style pole of 12m in height supporting 3 no. small scale antennas above, the largest of which has a centre line height of 13.83m. It is important to note that the proposed 3G and GPS antennas are extremely small scale and have been positioned as close to the main omni antenna as possible to reduce the overall antenna profile.
- 6.3. The proposal is situated nearby to numerous vertical elements of street furniture including telegraph poles, street lighting columns and а similar telecommunication slim line monopole. The similar vertical lines of the nearby street furniture will therefore allow the facility to assimilate with its surroundings. The site has been carefully selected in a position capable of providing the required essential SMN coverage whilst as far away as technically possible from the views of residential properties. The site benefits from the masking effects associated with nearby hedgerow and tree planting forming a screening block towards the site for views from properties to the west. The site has also been selected adjacent to a busy road network in a position overlooked by a large car dealership facility and the access road into an industrial estate.
- 6.4. The visual effects have been further reduced by specifying the narrowest available profile of pole whilst keeping height down to the absolute minimum

capable of providing the required coverage. It is also worth stating that the ancillary equipment enclosures are of small proportions, being significantly smaller than the equipment cabinets found within the street environment.

Amount, Design, Layout and Scale of the Development

- 6.5. The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide an acceptable level of coverage to the local area, having regard to the need to minimise visual impact, which have been explained in the previous sections of this statement.
- 6.6. For example, the height of the mast, the numbers of antennas and their size, is the minimum amount of development required to provide coverage for the smart meter network. The mast, a very simple, slimline pole design supporting three antennas, has been chosen as this is of similar appearance to other types of man-made vertical structures such as streetlights, that are a common feature of townscapes and landscapes across the UK.
- 6.7. The same design considerations apply to the equipment cabinet, which is of similar size and design to other types of roadside cabinets commonly found in urban and rural areas. The location of the equipment cabinets, and the electronic communications equipment housed within them, reflects the technical and operational requirement to be in reasonable proximity to the antenna systems they support.

Access Considerations

- 6.8. The installation is proposed to be installed on the grassed verge on the western side of Spalding Road with sufficient space available for parking construction vehicles without requiring a total road closure or complex and disruptive traffic management measures.
- 6.9. Once constructed, the development will be unmanned requiring only periodic visits about once every two to three months for routine maintenance and

servicing. The site will be easy to access for this purpose and typical visits will be by an engineer using a light vehicle that will be parked lawfully nearby.

Landscaping

6.10. In view of the nature of the development which already looks to best utilise existing screening benefiting from the masking effects associated with nearby mature tree planting and border hedgerow planting, a scheme of hard or soft landscaping is not considered necessary or appropriate in this case. The development is similar to other man-made utility and communication structures commonly found in street locations without dedicated associated landscaping.

Appearance

6.11. The sensitive approach to siting and design should minimise the appearance of the development proposed. In addition, the local topography and natural features should help minimise views. Insofar as the mast and equipment cabinet may be visible, they should look straight forward in appearance and reflect their function. To that extent they should in time become accepted features of the local environment as with other forms of communications networks and essential public utility infrastructure.

7. ICNIRP COMPLIANCE

7.1. A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application. Accordingly, as explained within the NPPF, it is not necessary, to consider further the health aspects and concerns about them, which include the perception of risk.

8. SUMMARY AND CONCLUSIONS

- 8.1. The proposed development forms part of Arqiva's planned smart water metering network for Anglian Water in Kirton. The smart water metering network is very important. The information provided by the smart water meters will allow Anglian Water to properly understand water consumption and have greater network visibility, in turn allowing better network and resilience planning to ensure that demand does not outstrip supply. For consumers, smart water meters will allow users to better manage and reduce water consumption and potentially save money. Smart water meters will play an important role in the government's policies to achieve a transition to a sustainable economy and society.
- 8.2. The use of the application site looks to provide the best balance between operational and environmental considerations. The site is located so that it can provide the required level of coverage to the properties it needs to serve, and the use of an innovatively designed slim line structure will ensure that it appears similar to other street furniture commonly found within the street scene. The design and appearance of the structure should, therefore, be acceptable.
- 8.3. 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.
- 8.4. This statement has demonstrated that the proposal is in accordance with national policy set out in the NPPF and its detail complies with local policy objective of minimising potential environmental impact. It is a form of development that is specifically encouraged as a matter of principle, constitutes permitted development, and in its detail complies with the policy objective of minimising potential environmental impact.
- 8.5. In conclusion, the application merits support and there are no material considerations that indicate otherwise.