Town Planning and Heritage Statement

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

At the Existing Cellnex Site / BT Telephone Exchange

Whitehaven ATE, Catherine Street, Whitehaven, Cumbria, CA28 7PA (NGR E: 297610 N: 518080)

Site Reference: COL.MOD.UK.0008716
Cellnex UK

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1. INTRODUCTION

1.1 This statement is submitted in support of an application for planning permission for an upgrade to an existing established site for the mobile network operator (MNO) Vodafone. 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

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 relates to an upgrade of an existing telecommunications base station located on the rooftop of the Whitehaven Telephone Exchange building on Catherine Street, within Whitehaven town centre. The building occupies a central position to the east of the town's primary commercial corridors along Lowther Street and Strand Street, within the Whitehaven Town Centre Conservation Area. Listed buildings are found along Catherine Street to the west and Duke Street to the north. The surrounding area is typical of a town centre fringe location and comprises a mix of civic and commercial infrastructure transitioning to established residential developments. The site is adjacent to a public car park and sits within close proximity to civic facilities, including the Cumbria Constabulary premises to the west, as well as Castle Park to the east. The site is well-integrated into the town centre location.

2.2 The 1960s exchange building itself is a 4 storey building with a telecommunication base station at roof level. The proposal is for an upgrade to the existing rooftop base station to facilitate essential new 5G services at this central location.

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 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 installation of 6 no. replacement antenna and ancillary radio equipment onto new support poles, along with ancillary development thereto at existing rooftop site.
- The removal of 2 no. equipment cabinets, and the installation of 1 no. equipment cabinet at rooftop level.
- The installation of cabling and associated development.
- Ancillary development thereto.

3.4 The telephone exchange building has a roof level height of 23.65 metres at the top of the stairwell. The proposed development involves a like-for-like replacement of the existing infrastructure and does not increase the operational height of the support poles attached to the building. While new antenna support poles will be installed to support the upgraded equipment, the installation will maintain an overall height consistent with the existing configuration. The surrounding visual profile and views toward the rooftop installation will remain unchanged. The replacement has been designed to deliver upgraded coverage and mobile infrastructure improvements while avoiding any additional visual impact.

3.5 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.

3.6 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.

3.7 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 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. Following submission of the engagement letter, the Council provided a link to its pre-application guidance and associated fees. Due to the minor nature of the proposals, it was decided not to pursue the pre-application process and to proceed directly with the planning application.

5. PLANNING POLICY

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

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

5.2 From these documents, it can be discerned that 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 Whitehaven Town Centre Conservation Area and as such we provide a Heritage Statement in support.

5.5 The application site is located within the Whitehaven Town Centre Conservation Area, in the eastern part of the town's Georgian Grid-Iron character area. The significance of the Conservation Area derives from its planned late-seventeenth and eighteenth-century grid-iron street layout and cohesive street frontages. However, the immediate surroundings of the site on Catherine Street have undergone substantial redevelopment during the mid-to-late twentieth century. This has resulted in a more modern, functional built environment, including the Telephone Exchange itself, the adjacent public car park and nearby civic premises which contrast with the historic architecture and more cohesive townscape found elsewhere within the Conservation Area.

5.6 The existing telecommunications equipment is located within this established infrastructure setting, with the surrounding built form and street layout limiting its visibility from the wider historic town centre. The site is visually separated from nearby heritage assets, including the Grade II* listed Catherine Mill to the north and the historic buildings fronting Lowther Street. Where visible, the rooftop installation is viewed against the backdrop of the mid-twentieth-century Telephone Exchange, a utilitarian building constructed from brown brick, steel and concrete render, which contrasts with the historic Georgian architecture found elsewhere within the Conservation Area. Accordingly, the proposal will preserve the established character and appearance of the Whitehaven Town Centre Conservation Area.



Southern elevation of the site from Catherine Street, October 2025. (Source: Google Maps).

5.7 The proposed upgrade involves a like-for-like configuration replacement at an established rooftop base station, avoiding the requirement for an additional standalone installation within the designated conservation area. By utilising the existing building infrastructure and maintaining the established height, the strategy minimises additional visual change to the surrounding environment while modernising the local mobile network infrastructure.

5.8 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 Areas are balanced by the need to conserve or enhance their heritage qualities.

5.9 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.

5.10 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, as set out under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.

5.11 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.

5.12 The emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage remains. The revised NPPF gives substantial weight to the benefits of maintaining or improving network coverage, capacity, reliability, and resilience and that proposals should use existing masts or buildings where possible. Policy CO1 also expects proposals to be sited and designed to minimise visual impact so far as practical taking into account its operational requirements. Policy CO1(2) re-affirms that local planning authorities should not question the need for the expansion or upgrading of telecommunications networks.

Local Policy Considerations

5.13 At the local level, the proposal has been considered against the Copeland Local Plan 2021–2039, adopted November 2024, which forms the statutory Development Plan for the area.

5.14 The Development Plan contains a specific policy framework dedicated to digital infrastructure under Strategic Policy CO1: Telecommunications and Digital Connectivity. The proposal directly aligns with the strategic objectives of the Council which states: "*The Council will support the continued provision of infrastructure that extends and improves digital connectivity across all parts of Copeland, particularly where it provides access to 5G".*

5.15 Policy DS4: Design and Development Standards outlines that the Council will support development that "*meets the highest possible standards in terms of sustainable design and construction*" and "*relates well to the existing built environment*". The upgrade of an existing telecommunications base station aligns with the plan's climate change mitigation strategies, which note that "*the restoration, refurbishment and retrofit of existing buildings can have less of a carbon impact than new build developments*". This strategy ensures that the local community benefits from improved network capabilities through the "*reuse of existing resources*" without requiring separate, additional ground-based infrastructure.

5.16 Strategic Policy R3: Whitehaven Town Centre, alongside the Council's broader economic objectives under Strategic Policy E1, recognises the town as the "*Principal Town"* and primary focus for retail, commercial, and municipal core services. The plan emphasises that "*digital connectivity to allow flexible working*" is a key modern priority to keep "*communities vibrant*". The enhancement of the electronic communications network at this site directly facilitates the advanced digital infrastructure required to "*foster inclusive local economic growth".*

5.17 Strategic Policy BE1: Heritage Assets and Policy BE2: Designated Heritage Assets require that proposals conserve or enhance features of "*historical, cultural and archaeological value*". The application site is situated within the Whitehaven Town Centre Conservation Area, however, the host Telephone Exchange is an unlisted building that already accommodates rooftop telecommunications infrastructure.

5.18 As noted in the accompanying Heritage assessment, the immediate context of the site along Catherine Street is a municipal quarter redeveloped during the mid-to-late

twentieth century defined by its proximity to a public car park and civic facilities. The proposal involves a like-for-like infrastructure replacement that maintains the established design height of the support poles. Given the existing presence of telecommunications infrastructure and the functional nature of the host utility building, the proposal does not alter the vertical massing or harm the character and appearance of the Conservation Area, ensuring the significance of the wider historic environment is preserved.

5.19 Policy DS4: Design and Development Standards states that development should support "*high quality design*" that "*protects amenity and creates quality places*". The proposal responds directly to the scale of the host building. By utilising an existing rooftop rather than introducing a new street-level mast, the development prevents additional visual clutter and ensures the equipment is proportionate to its infrastructure setting. Maintaining the existing height profile ensures the upgrade is limited to technical replacement needs while remaining secondary to the massing of the building.

5.20 National planning policy is a material consideration. The National Planning Policy Framework (NPPF) provides clear support for the expansion and upgrading of high-quality communications networks. It specifically encourages the use of existing buildings and sites to provide the infrastructure needed for economic growth and social well-being.

5.21 As a matter of principle, the development proposed is in accordance with the relevant local and national policy framework. The upgrade ensures the provision of upgraded mobile infrastructure while respecting the character of the Whitehaven Town Centre Conservation Area. In the next section, the Design Considerations are reviewed to demonstrate that the detail of the development is acceptable and that, in accordance with the presumption in favour of sustainable development, planning permission should be granted.

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 accommodates an established rooftop telecommunications installation at the Whitehaven Telephone Exchange on Catherine Street. The building is situated at a town centre fringe location comprising a mix of civic and commercial uses transitioning to residential developments. While the site lies within the Whitehaven Town Centre Conservation Area, it is positioned within a functional quarter and remains visually separated from more sensitive heritage assets. The proposal involves a basic like-for-like replacement to upgrade the existing infrastructure, maintaining the established height of the support poles. By modernising this existing base station rather than introducing an additional standalone installation, the proposal prevents vertical expansion and ensures the surrounding visual profile remains unchanged.

Amount, Design, Layout and Scale of the Development

6.3 The scale, layout and design of the development have 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 proposed apparatus is functional and proportionate to its infrastructure setting. The replacement antennas and associated antenna support structures reflect the scale and form of the existing rooftop equipment and align with standard modern telecommunications design. The installation maintains the established height configuration of the support poles, with no additional vertical expansion into the skyline. When viewed in context, the upgraded equipment

reads directly as part of the established rooftop installation and will not introduce an altered visual profile to the building. The development represents a continuation of the site's existing infrastructure use rather than a visually distinct addition.

- **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 development remains confined to the established rooftop area and does not alter the overall composition of the building when viewed from street level. The new support poles maintain the established height configuration of the existing equipment, ensuring the rooftop profile is contained within the wider townscape context. Visibility remains comparable to existing views of the site. Consequently, the proposal does not introduce additional visual impact beyond that of the established installation.

- **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 focussed more upon the streetscape.

- **Avoid creating clutter**

  The apparatus should not look unduly cluttered where its appearance remains as existing and contained within the confines of the existing, established rooftop installation and insofar as it might be visible it will remain viewed as existing 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 remain as existing and have 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 Catherine Street 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 ensures the appearance of the development is minimised. The upgrade maintains the established height configuration of the existing equipment on the support poles, matching the baseline required to meet the operational parameters for upgraded local network coverage. The replacement equipment remains consistent with the existing configuration in terms of scale and form, retaining the established and functional appearance of the site. Insofar as the antennas may be visible, they present a straightforward appearance consistent with the existing installation and reflect their utility function. To that extent, the upgraded site remains an accepted feature of the local environment as with other forms of communications networks and essential public utility infrastructure.

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.