

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Park View Road (A207) SW	Site Address:	Footpath on south side of Park View Road (A207), Park View Road, Welling, Kent, DA16 1SF
National Grid Reference:	547310, 175629		
Site Ref Number:	30374800 TEF 72058	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why: Online Local Authority planning database checked in lieu of a mast register.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority


Was there pre-application contact:	Yes
Date of pre-application contact:	
Name of contact:	

¹ Macro or Micro

In the first instance, all correspondence should be directed to the agent.

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Registered in England & Wales No. 08087551.
VAT No. GB142 8555 06

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1530 Arlington Business Park,
Theale, Berkshire, RG7 4SA

Summary of outcome/Main issues raised:

A consultation letter, together with supporting documents, was sent to the Local Planning Authority on 01 December 2020. No response has been received to date.

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:			
<p>As with all Cornerstone and Telefónica proposals, the application site and proposal were assessed against the traffic light model contained within the Code of Best Practice on Mobile Network Development. A red rating was assigned.</p> <p>Over and above the requirements of the Code, consultation was issued to:</p> <p style="padding-left: 40px;">Falconwood and Welling Ward representatives Sir David Evennett MP 14 nearby residential properties Bexley Council Highways Department</p> <p>A copy of all consultation correspondence can be provided upon request.</p>			
Summary of outcome/main issues raised (include copies of relevant correspondence):			
<p>To date, no responses have been received from Ward representatives, the MP or residents. Should any representations be made during the course of the application, we will provide copies of these to the Local Planning Authority.</p> <p>Bexley Council Highways Department has responded to advise that they will only provide comments during the course of the application.</p>			

School/College

Location of site in relation to school/college (include name of school/college):


The closest school to the application site is Park View Academy. Park View Academy is located approximately 250m west of the site location.

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Park View Academy, 146-148 Parkview Road, Welling, DA16 1SR

Outline of consultation carried out with school/college (include evidence of consultation):

Three schools and two nurseries have been written to as part of the pre-application consultation; addresses are given below.

Park View Academy, 146-148 Parkview Road, Welling, DA16 1SR – approx. 250m from the application site.

Foster's Primary School, Westbrooke Road, Welling, DA16 1PN – approx. 300m from the application site.

Aspire Academy Bexley, South Gipsy Road, Welling, DA16 1JB – approx. 300m from the application site.

Bexley Day Nursery, Park View Road, Welling, Kent, DA16 1SY – approx. 90m from the application site.

Super Kiddies Day Care, Car Shipping House, 2a South Gipsy Road, Welling, DA16 1JB – approx. 250m from the application site.

A copy of the consultation will be provided upon request.

Summary of outcome/main issues raised (include copies of main correspondence):

No responses received to date, should any representations be made during the course of the application, we will provide copies of these to the Local Planning Authority.

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)


Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No

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Details of response:

N/A – More than 6km to closest airfield, London City Airport.

Developer's Notice


Copy of Developer's Notice enclosed?	Yes	No
Date served:	Friday 04 June 2021	

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3. Proposed Development

The proposed site:

The application site is located on the footpath on the south side of Park View Road (A207), approximately 14.5m west of the entrance to Bexleyheath Sports Club.

The site is located within an area of mixed land use. This stretch of Park View Road is made up of two-storey residential properties, Bexleyheath Sports Club, and, commercial properties such as the petrol station and car dealership on the opposite side of the road from the application site. The application site is located approximately 50m to the east of an existing mobile phone base station.

The proposal is to erect a 17.5m high street furniture design monopole supporting 3No. internally shrouded antennas.

At ground level, there will be 1No. equipment cabinet. The equipment cabinet will be sited to the back of the footpath, leaving a 2 metre gap between the cabinet and kerb edge. The cabinet will be approximately 2 metres west of the pole's position. The cabinet will run parallel with the fence behind to give a tidy finish.

The specific aim of this application is to provide improved 2G, 3G and 4G network coverage for Telefónica customers in the local and surrounding community. In order to achieve this, a site must be identified in reasonably close proximity to the community it is designed to serve.

Enclose map showing the cell centre and adjoining cells if appropriate:

Predictive coverage plots available on request.

Type of Structure (e.g. tower, mast, etc):

Street furniture design monopole

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Description:

The installation of 1No. 17.5m high monopole supporting 3No. internally shrouded antennas together with 1No. equipment cabinet at ground level and ancillary works thereto.

The antennas will be mounted at the top of the pole, within the antenna shroud. The pole and shroud will be painted RAL7035 Light Grey. The equipment cabinet will be painted RAL6009 Fir Green.

The equipment will be installed on the southern footpath of Park View Road, the pole will be approximately 14.5 metres to the west of the entrance to Bexleyheath Sports Club. The equipment cabinet will be sited approximately 2m to the west of the pole position.

Overall Height:	17.5 metres to top of monopole
Height of existing building (<i>where applicable</i>):	N/A
Equipment Housing:	Commscope Yorkshire cabinet
Length:	2.95 metres
Width:	0.66 metres
Height:	1.758 metres
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Monopole made of galvanised steel, finished in RAL7035 Light Grey.
Equipment housing – type of material and external colour:	Equipment cabinet made of steel and finished in Fir Green RAL6009.

Reasons for choice of design, making reference to pre-application responses:

In designing the proposed scheme, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. However, it must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree.


There are three main elements to a radio base station: the cabinets which contain the equipment used to generate the radio signals; the supporting structure that holds the antennas in the air; and, the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the links into the network either by fibre cabling or by dish antennas (cabling in this instance), power source (within Yorkshire cabinet),

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feeder cables that link the equipment housing to the antennas and the various fixings, often referred to in general terms as “ancillary apparatus”.

The type of technology being deployed determines the type of equipment and antennas required, which in turn impacts upon the type of support structure and/ or design methods than can be employed on an aesthetic level. In order for the base station to effectively provide coverage to the desired areas and fit in with the established network pattern, specific antenna orientations and heights, determined by the radio planners, must be achieved.

The purpose of this installation is to provide improved 2G, 3G and 4G network coverage for Telefónica. In order to achieve this the installation of a 17.5m high monopole is required at this location.

The pole height of 17.5m is required to ensure that the coverage is not degraded by surrounding features, such as houses and trees. Radio signals, at the frequencies used for cellular radio, propagate in a manner that is broadly similar to light. Generally anything that casts a shadow to light will attenuate radio waves. The strength of radio signals detected at a receiving device naturally reduces the further away it is from the transmitter. In general, the attenuation (or decay) in signal power is affected by a number of variables. The main factors are:

- signal frequency (attenuation increases with frequency),
- distance (from the transmitter),
- terrain (such as hills),
- clutter (such as buildings, foliage, vehicles, and water) and
- atmospheric conditions (such as rain).

A reduction in the strength of the radio signal increases the likelihood of dropped calls and reduced data rates for internet browsing, for example.

The height of the monopole is necessary in order to allow the antennas to exceed the mature trees located to the south west and taller buildings, such as the apartment block on Denham Close, enable the coverage object to be met. This structure was deemed the most sensitive structure to deploy, being a slimline monopole. The nature of the area and presence of other vertical features along the road edge will mitigate the view of the structure.


Given the urban street scene environment in this area, the natural choice for a support structure was something of street furniture design. The Elara monopole is designed to integrate with the street scene given its street furniture style pole with slim appearance. The antennas at the top of the pole are shrouded, resulting in sleek, unfussy finish.

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Other design choices, which would allow additional flexibility for the network in terms of antenna size/ type and array, were not considered; the trade-off with many of these structures is a larger, open headframe which is not suitable given the location.

The Elara has a narrow footprint and support column similar to a lamppost, above which the antennas are fixed. The antenna section, which is slightly wider due to the size of the antennas and fixings, is shrouded. This section of Park View Road has other vertical features such as existing streetlamps and another operator's telecommunications site (of similar street furniture design).

The monopole is Light Grey (RAL7035) in colour as this is thought to be the least eye-catching colour and will not stand out when viewed against the skyline. The pole and antenna shroud will be the same colour giving a uniform, inconspicuous appearance. The equipment cabinet is Fir Green (RAL6009) in colour which is similar to the existing telecommunications site situated approximately 50m to the west of the application site. Whilst the proposed colour scheme is considered appropriate for this site, the Applicant would be willing to adhere to any colour scheme deemed more appropriate by the Local Authority and would like the opportunity to discuss this with the Local Authority during the course of the application process should this be the case.

Care has been taken to arrange the cabinet and pole in a manner that would not impede normal use of the highway and that would minimise visual impact as far as possible. Consideration has been given to pedestrian movement, the presence of underground services and potential interference from trees. The equipment housing and monopole will be sited so to minimise any obstruction to pedestrian movement. The cabinet is coloured green in keeping with the nearby green space and vegetation. However, as noted above, should the Local Planning Authority consider another colour to be more appropriate then this can be considered.

The proposed location for the equipment cabinet allows a distance of 2 metres between the edge of the cabinet and the kerb edge. The Highways Act 1980 states that the minimum width of a footpath is 1 metre.


As detailed, all apparatus proposed, will play a vital role in the provision of 2G, 3G and 4G coverage for Telefónica. The scale and quantity of apparatus has been limited to the minimum with which this can be achieved, with the result that the level of visual change at this site would be outweighed by the all-embracing public benefit of this proposal. It is therefore considered, that the design is appropriate to the site and surrounding residential character of the area which avoids any unacceptable level of impact.

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Technical Information


	Yes	No
<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)</p> <p>International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.</p> <p>When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, Telefónica UK Limited operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.</p> <p>As part of Telefónica's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.</p> <p>The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.</p>		

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4. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

Reason(s) why site required e.g. coverage, upgrade, capacity

Improvements to the mobile phone network nationally is largely driven by customer usage and the need to improve existing infrastructure to aid network resilience and increase data speeds. More recently, there has been significant investment by the UK Government as part of a nationwide push for better, more reliable connectivity and faster download speeds.

On an individual site level, the need for a new site in a given area is often due to increases in local usage (increased capacity required) or a need to facilitate new technologies. In this instance, the site is required to provide better 2G, 3G and 4G services to customers in the area. The addition of the application site on Park View Road will enable the network to carry more traffic at any given time, alleviating capacity issues for the surrounding cell sites.

This area of Bexley, between Welling and Bexleyheath, was identified as having deficient mobile phone coverage for the operator several years ago. Since then, the search for a suitable site has been ongoing in order to fill the 'hole' in blanket coverage. The proposed location has been identified as being able to meet the network's needs and provide high quality connectivity which will result in users being able to access fast data speeds and reliable voice services.

The existing Telefónica users rely on nearby cell sites to provide 'signal', however due to the distance and the number of users, service can be unreliable. If the number of users exceeds the capacity that a site can accommodate, users experience slow connectivity with potential for 'dropped calls'. This distance of the existing cell sites from the users in this area, coupled with the continuing rise in data usage and mobile phone demand means that the existing sites are unable to meet the increased need resulting in users experiencing poor quality service. The installation of a site on Park View Road will provide new services to this area and increase the network's capacity, which will meet the ever-increasing user demand.

The need for additional sites


Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion. As stated in Paragraph 112 of the NPPF '*Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile*

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technology (such as 5G)...' The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal will assist in enhancing the coverage to the surrounding area, and, will assist in achieving these objectives.

The London Borough of Bexley Council recognises the importance of good connectivity, the 2012 Core Strategy states *"enhancing the quality of key physical infrastructure services (transport, water, sewerage, electricity, gas, telecommunications etc) will enable positive improvements to the health, safety and wellbeing of Bexley's residents"* (paragraph 4.3.1).

In its 2011 Communications Market report, Ofcom summarised one of the 'key market developments' as follows: *"The explosion in mobile data volumes. The increasing use of mobile broadband services via dongles and smartphones resulted in a 67% increase in data transferred over the UK's mobile networks in 2010..."*

The increase in smart phone usage clearly demonstrated in the Ofcom Communications Market Report published in August 2018, which makes the following key points in relation to mobile phones and 4G usage:


- The proportion of adults who personally use a smartphone has increased from 27% in 2011 to 78% in 2018.
- In 2011, a third of mobile phone users used their phone for web and data access, by 2018 this has risen to three quarters of mobile phone users.
- With faster data network connectivity, use of data networks has also increased. The average monthly data use per mobile SIM, increased by more than 40% in the year to June 2017, to 1.9GB. This is an eight-fold increase on the 2012 level of data usage.
- The rise of smartphones has led to the mobile phone becoming the most-missed media device in 2015, a status which it has retained since then, and by 2017, 46% of internet users said their smartphone was the device that they would miss the most.
- 92% of Android users who downloaded the Ofcom branded research app thought it was 'extremely' or 'very' important that they could access and browse the internet on their mobile every day. This compared to 75% who said it was 'extremely' or 'very' important that they could make voice calls every day, with only 65% of 18-24s considering making a voice call 'extremely' or 'very' important. This suggests a stronger preference among younger people for using non-traditional communication services (e.g. messaging applications) rather than traditional telephone calls.
- On average, mobile phone users spent 2 hours 49 minutes per day using their mobile phone in 2017, an increase of 24% since 2015. Use was highest among those aged 15-24 who spent, on average, more than four hours a day using a mobile phone in 2017.

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- Use of the smartphone to go online when not at home or work accounts for 72% of time spent online.

Furthermore, in Ofcom's Online Nation 2020 report - an annual report which presents data on internet usage - Ofcom states *"Consumers are increasingly using services provided over the internet to communicate, including apps and websites such as WhatsApp, Facetime, Snapchat and Gmail. The use of online communication services has grown with increased mobile phone use, the availability of low-cost data plans and better connectivity, both within and outside the home—and more recently, as people have turned to online communications as a way of staying in touch during the lockdown."*

In the same 2020 report, Ofcom detail how usage has changed during the coronavirus pandemic. *"[Ofcom] research indicates that on a daily basis online adults are using WhatsApp for text messaging daily to a similar extent as SMS (40% vs. 41%), and since the imposition of measures related to the coronavirus, the use of video calling at least weekly has more than doubled (35% vs. 71%)."*

The use of online communication services continues to grow, and evidence shows that consumers wish to access these services both at home and on the go. To meet this increasing demand in data usage, and to improve the quality of service, many of the existing mobile phone base stations require upgrading as well as the addition of new base stations into the network. This proposal forms part of a widespread plan to improve the current network infrastructure and meet the increasing demand for voice and data services.

The new site on Park View Road will serve existing customers of the services and will provide these users with better, more reliable services as well as accommodating the predicted increase in users as data usage becomes more widespread. It will serve the need for improved coverage and data transfer speeds resulting from the rapid growth of the number of people that now own and use mobile phones including smart phones.

4G (also known as LTE) allows users of the network to benefit from ultra-fast speeds when browsing the internet, streaming videos, or sending emails wherever they are. It also means faster downloads on the go. Ofcom's 2018 report states that with future technologies, including 5G, *"mobile data network connection speeds are expected to increase significantly, making a new generation of mobile services a reality and generating further demand for on-the-go data connectivity."*

One of numerous benefits of this, on a wider scale, is that this allows for an increase in home working, by providing the opportunity to create a "virtual office", reducing the need to travel for work therefore, which is helpful in supporting the sustainable

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development agenda. Home working has become a necessity in recent months due to the pandemic and the government's appeal for people who can, to work from home thus leaving public transport and roads with less commuters making it safer for key workers who need to travel.

Recent lockdown restrictions have also seen a surge in online shopping and use of video conferencing facilities, which require a stable and fast data connection. This site's location close to a residential area and adjacent to a busy dual carriageway is well positioned to accommodate the increased data usage from surrounding houses as residents work, shop and socialise from home via the internet.

The site's position, approximately 390m from the overground line between Bexleyheath station and Welling station, enables users to receive reliable connectivity whilst travelling. The application site is also well positioned to serve users of the local road network, many of the surrounding roads are feeder routes for the A2. Good connectivity on transport routes is beneficial for users, road users specifically may rely on internet mapping systems for navigation or for passengers using voice and data services for entertainment or other means.

The UK government's Digital Infrastructure Minister, Matt Warman, delivered a speech at the Connected Britain conference on 23 September 2020, which evidences the government's intention to promote "world class digital connectivity" within the UK. Warman states that the government is bringing legislation reform to make it easier to deploy mobile phone base stations and that there is a specific Barrier Busting taskforce to aid the industry in deploying the required infrastructure. Warman refers to the recent pandemic and lockdown restrictions, during which good connectivity was crucial to everyday life; ensuring businesses could keep trading and maintaining contact between family and friends which boosted the nation's morale and well-being on an individual level. Warman credits the industry for "[keeping] school children connected with their teachers, allowed isolated grandparents to speak to their grandchildren, and enabled great British businesses to power the economy through these difficult times". He goes on to recognise that the importance of connectivity is not limited to lockdown conditions, indeed he considers it vital for the nation's recovery, he states "*the digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown - and is now more important than ever as we head into recovery*".


The government is keen to see all areas of industry flourish and recognise the possibilities that improved connectivity could bring. The UK government is in the process of launching a new digital strategy which further promotes a world-class digital infrastructure which is accessible to all and is futureproofed for new technologies.

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It is our view that this proposal is exactly the type which the government is endorsing. The application site will enable Telefónica to provide a better level of coverage to this area of Welling and Bexleyheath. Customers will experience improvements in 2G, 3G and 4G coverage, benefitting both voice and data services. The new site will increase capacity and improve the resilience of the network in this area. The Applicant has designed the site so as to have minimal aesthetic impact on the surrounding area and yet meet the coverage need.

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5. Site Selection Process

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)


Site Type	Site name and address	National Grid Reference	Reason for not choosing site
Greenfield	Welling United FC, Park View Road (A207), Welling, Kent, DA16 1SJ	547180, 175650	A site at this location has been considered by the Network's Radio Planner and discounted due to the limited space available for an installation. It should be noted that there have been other applications for telecommunications installations at Welling United Football Club, all of which have been withdrawn prior to the decision. The application site proposed herein consists of a slim street furniture monopole which is less industrial in appearance and more in keeping with the surroundings when compared with that proposed previously by other operators at Welling United Football Club.
Rooftop	Apartment block, Denham Close, Welling, DA16 1SX	547164, 175710	A site at this location has been considered by the Network's Radio Planner and discounted on technical grounds; this location would provide inferior network coverage. It should be noted that a rooftop installation is more favourable than a street furniture site due to the greater flexibility in antenna orientation and tilt, as well as the opportunity to position antenna sectors on different parts of the rooftop. If the Network's Radio Planner felt that this was a suitable location then this option would likely be preferable due to the greater flexibility, however this is not the case. From a planning perspective, Denham Close apartment block has been visually discounted due to the anticipated prominence of panel antennas mounted onto the rooftop which, when compared with a street furniture pole in this location, was considered less appropriate.

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Street Furniture	Street Furniture at 66-Crook Log, Junction of Crook Log/Danson Rd, Welling, DA7 4HH	547662, 175543	A street furniture installation, similar in appearance to the application site, was considered at this location. However, it was felt that the application site had planning merit that this site did not.
Rooftop	Kwikfit, 66 Park View Road, Welling, DA16 1SQ	547385, 175643	A rooftop installation at this site would be too low in height to provide the required network coverage. This has therefore been discounted on technical grounds.
Rooftop	Sharnbrooke Close Flats, Sharnbrooke Close, Welling, DA16 1SL	547254, 175688	A rooftop installation at this site would be too low in height to provide the required network coverage. This has therefore been discounted on technical grounds.
Rooftop	GMB Building, 1 Park view Road, Welling, DA16 1SY	547099, 175679	A rooftop installation at this site would be too low in height to provide the required network coverage. This has therefore been discounted on technical grounds.
Street Furniture	Street Furniture opposite Danson Mead, opposite 18 Danson Mead, Welling, DA16 1RX	547396, 175609	A street furniture installation, similar in appearance to the application site but with a height of 22m, was considered at this location. However, it was felt that the application site had planning merit that this site did not.
Rooftop	WJ King Vauxhall Welling, 70-88 Park View Rd, Welling DA16 1SF	547328, 175669	A rooftop installation at this site would be too low in height to provide the required network coverage. This has therefore been discounted on technical grounds. In any case, this roof would not be suitable for the installation of telecommunications equipment by virtue of the nature of the pitched roof.
Site share of street furniture	T-Mobile 51174, Footpath fronting Bexleyheath Sports Club, Park View Road, Welling, DA16 1SY	547268, 175641	This is an existing street furniture style mobile phone base station on the public highway. There is no design solution that enables a site share of a street furniture pole between T-Mobile and Telefonica. Therefore, if a site share were to be pursued it would be a non-street furniture structure which would not be possible at this location.

If no alternative site options have been investigated, please explain why:


N/A

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Environmental Information (refer to Section 2 of Site Finder Report):

The existing site is not located in an environmentally sensitive area, or within an identified protected habitat or protected species area.

Land use planning designations (if Heritage Statement is required then include here or make reference to attached Heritage Statement):

The application site is not located on designated land, nor is it close to any sensitive sites.

The application site is located approximately 300m from the Grade II* listed "Stables to Danson Park" situated at Danson Park. The application site is not expected to impact upon this heritage asset given the separation distance and the presence of buildings and a small, wooded area in the intervening area.

Additional relevant information (include planning policy and material considerations):

As set out earlier in this document, the application site will integrate with the surrounding cells to form a blanket of good connectivity which seeks to serve the existing cohort of Telefónica customers. The proposal will enhance the current 2G, 3G and 4G voice and data services in the area. The addition of this site into the network will deliver an important improvement to the network's capacity as well as the services available, this means that the site will be able to facilitate a greater amount of data usage at any one time which will benefit existing Telefónica customers as well as new Telefónica customers in the area.

This section should be read in conjunction with the preceding sections of this statement where a description of the application site, technical details and justification for the design and details of the public benefits of the proposal are provided.

Siting and Appearance


From the outset, it should be appreciated that irrespective of the development's use as a communications site, the installation of a new tall structure will always be, to some degree, a noticeable addition in the local area. However, it should be recognised that visibility does not equate to harm. In this regard, it is acknowledged that the proposed telecommunications installation would be installed in a non-elevated location within the target coverage area.

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The choice of design at the application site is governed by two main factors; the context and visual amenity of the area; and the technical requirements. As far as practicable the proposed development has been designed to keep to a minimum the impact on local amenity and the streetscene.

This application is for a new ground-based telecommunications installation, the slimline monopole selected is best suited to areas where there are other vertical structures (such as lampposts present here). The mast remains mostly uncluttered with a slimline appearance and not overwhelmed with equipment. It is not considered that the equipment housing cabinet causes substantial additional visual impact, nor does it result in visual clutter to warrant a dismissal when balanced against the benefits of the proposal. The cabinet does not hinder pedestrian access and is arranged in a neat, linear fashion, running parallel with the fence behind.

The proposal would not result in the loss of sunlight or overshadowing of any properties, nor would the proposal result in loss of outlook from any property. The development would not give rise to issues relating to noise and disturbance.

The column width is essential in order to fit the antennas and feeder cables within the structure. It is the most slimline solution available to provide the required coverage.

The Industry Code of Best Practice acknowledges that the visual impact of a mast can be greatly reduced if it is placed near similar structures such as road signs and lamp posts. The proposed site is located close to an existing lighting column and opposite to a vehicle filling station and car garage which has large vertical signs outside. The application site is immediately outside of Tennis Courts. When viewed over a longer distance, this pole will form part of a collection of street furniture as well as floodlighting columns from the nearby Welling United Football Club. As a result, the proposed design fully accords within the NPPF, The Code of Best Practice and the Development Plan.

Passers-by travelling west on Park View Road A207 will view the installation as a whole with the streetlamps lining Park View Road, as well as the floodlights at the Football Club and the existing T-Mobile site 51174 on the footpath fronting Bexleyheath Sports Club. Those heading east on Park View Road will view the site in context of the surroundings, a line of streetlamps against a backdrop of trees on the verge outside Danson Mead.


Structures, such as that proposed by the applicant are now largely accepted as being ordinary elements of urban and suburban street scenes and so have increasingly less capacity to draw the eye, particularly in areas with mature trees or a proliferation of street lighting columns and other street furniture which mitigate the view of the vertical feature.

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The need to respect the character and appearance of the streetscene is fully acknowledged and by virtue of the proposal's siting, scale and appearance, this aim is achieved. The degree of visual change in the area would be low. Any change should be weighed against fulfilling the identified need and associated public benefits of the provision of high quality digital mobile connectivity to this area of Welling and Bexleyheath.

The location of a communications site is largely dictated by the customer base and where network users wish to access voice and data services. Mobile phone users wish to access services from home and on the go. Once a target coverage area has been identified, the specific location for the site can be determined.

In this instance, the search area identified by the Network's Radio Planner was relatively small due to the localised area requiring the improvements in coverage and the need to find a location which could tessellate with the surrounding existing cells. The search for a new installation in this area has been ongoing for several years, with no satisfactory solution having been achieved prior to this application.

The application site is situated on the highways verge of a travel corridor designated as a London Distributor Road in the Local Plan. Utility providers' equipment should not be considered out of place given the setting.

The proposed location has been chosen as the most suitable in terms of radio coverage provided and the best planning option. Alternative sites have been considered and discounted as set out earlier in this document.

On balance this proposed location is considered to be the optimum location in terms of siting and design, with the limited impact it may impose on the surrounding area being outweighed by the provision of enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact.

Additional information – Appeal decision - Mobile Broadband Network Ltd against the decision of Sheffield City Council


Further to the above points made, we draw your attention to a recent appeal decision where the Planning Inspectorate overturned a refusal of a 20m high street furniture design monopole (Appeal Ref: APP/J4423/W/20/3256458, decision dated 26 October 2020). The main issue in this case was the effect of the development on the character and appearance of the area. Whilst the appeal site was a replacement pole, the new pole was 8m in excess of the existing pole and would be more prominent due to its relatively high location in an open, undulating landscape.

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The Planning Inspectorate states *“I recognise the economic and social importance of advanced, high quality and reliable telecommunications and the strategic role of infrastructure in supporting growth.... It would enhance existing network coverage, allow for new 5G services and allow future upgrades without significant physical change. In terms of need the appellant states that the proposed mast is essential for sustainable economic growth and high-speed broadband technology. Other communications networks can play a vital role in enhancing the provision of local community facilities and services. Mobile connectivity allows businesses to operate efficiently, enables access to information and services anywhere, and opens new opportunities and markets.”*

The Planning Inspectorate acknowledged that there would be some harm, but this is outweighed by the benefits of the improved coverage. *“In this case, the proposed development would result in some limited harm to the area’s character and appearance, with particular regard to the proposal’s scale and siting... However, I conclude that this harm would, on balance, be outweighed by the economic and social benefits that would arise as a result of the proposed upgrade which would not be achieved with a mast of a lower height. The proposal would accord with Policy BE14 of the UDP and, overall, it would also accord with paragraphs 112 and 113 of the Framework where it outlines that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.”*

The Planning Inspectorate’s comments further support the overwhelming benefit that comes with high quality connectivity, this is detailed further later in this document. In light of the above, this application should be determined considering the benefits of improved connectivity in this area. As noted in the example appeal above, where some harm may be caused, this must be balanced against the benefits provided.

The application site has been designed in such a way as to limit any perceived harm to a minimum through appropriate siting and by proposing the smallest possible scale and quantity of equipment to meet the technical needs.

Planning Policy Guidance

National Planning Policy Framework (2019) (NPPF)


The updated NPPF, which came into force in July 2018 – and was subsequently updated in February 2019 - has replaced the 2012 edition, in terms of national policy specifically relating to electronic communications development.

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Paragraph 10 states *“At the heart of the Framework is a presumption in favour of sustainable development...”*

“11 For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

Paragraph 20 states that strategic policies should *“make sufficient provision for:*

*b) infrastructure for transport, **telecommunications** (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*

Leading on from this, Section 10 of the NPPF addresses supporting high quality communications infrastructure. Paragraph 112 sets out that *“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.”* The application site is exactly the kind which is working towards this government aim.


This application is submitted in relation to a new mobile phone base station on the public highway. Paragraph 113 states *“The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged.”* In this case, no existing mast or building has proved suitable for the installation of telecoms equipment. The site selection process is such that existing communications masts are explored first, followed by existing buildings and other tall structures. Had any of these options been available, the Network’s Radio Planner would have preferred the use of these due to the increased flexibility in terms of the equipment configuration.

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Paragraph 116 clarifies that LPA's "must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure."

ICNIRP compliance documentation is included within the accompanying application papers, thus the only remaining considerations must be planning related.

The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal, to provide high quality service in Bexleyheath will assist in achieving these objectives. The proposal outlined within this document is in complete accordance with the guidance as set out in the National Planning Policy Framework.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted development plan for The London Borough of Bexley comprises:

- The London Plan (2021)
- The Local Plan, including;
 - The Core Strategy
 - Current policies in the Unitary Development Plan
 - Technical documents

These are discussed below:

The London Plan (2021)

The London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area.


The Mayor opens the 2021 London Plan with his foreword, giving a vision for London's future. In his vision, he emphasises the importance of good digital connectivity in improving the lives of residents and the success of businesses.

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"It's about making London a city with clean air for our children to breathe, and a pioneering smart city with world-class digital connectivity supporting more digital devices to improve the lives of Londoners and enable businesses to thrive."

The London Plan seeks what the Mayor terms "Good Growth" within the nation's capital.

Paragraph 1.5.4 headed "Growing a good economy" states: *"The right infrastructure is also required to help businesses succeed across London. The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processes, opening up new markets and allowing more flexible working."*

Policy GG5 Growing a good economy (D) seeks to ensure that *"...physical and social infrastructure is provided to support London's growth"* and (E) *"ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning."* In order to achieve these aims, good mobile phone infrastructure and connectivity is required at home, work and on the go. More than ever, mobile phone users wish to communicate with others, or access internet services whilst on the move, enabling them to continue with business matters or e-learning. New telecommunication installations as well as upgrades to existing telecommunication installations, will be required in areas where current coverage is deficient in order to achieve the Good Growth policy aims as well as the aim to *"be a world-leading tech hub with world class digital connectivity"* (para 9.6.1 of the London Plan 2021).


The mobile phone network can also contribute towards Policy GG6 Increasing efficiency and resilience, specially (A) a move towards London becoming a zero-carbon city and (C) creating a safe environment resilient to emergencies. As noted elsewhere in this document, reliable high-quality connectivity enables users to access internet services wherever they are, this works to promote homeworking, as well as the opportunity to access other services, such as medical appointments, remotely which reduces the need to travel, further promoting the zero-carbon agenda. Mobile handsets enable members of the public to contact the emergency services instantly from any location, this can assist in early warning calls, preventing a catastrophe, or in response to an emergency of some kind. In 2014 Ofcom released a statement regarding emergency calls (calls to 999/ 112) and mobile phones. In that statement, Ofcom stated that there were around 36 million emergency calls each year, two thirds of which were from mobile phones. This further supports the need for good connectivity as users who find themselves in dire need of emergency assistance, need to be confident that there is sufficient mobile infrastructure around them, that has the ability to connect their call.

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Policy D1 London's form, character and capacity for growth B(2) requires boroughs to assess *"the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth."* As stated elsewhere in this document, the application site will meet the needs of the existing customers, as well as the anticipated growth with additional uptake in handsets as well as increased data demand. This element of 'future-proofing' of the network works towards Policies D1 and D2 Infrastructure requirements for sustainable densities.

Policy SI 6 Digital connectivity infrastructure sets out the Plan's aims for digital connectivity, including mobile phone connectivity. The Policy is drafted with much consideration being given to fibre connectivity and broadband, but it is clear that the aim of the policy is to support better connectivity in general in the capital.

"Policy SI 6 Digital connectivity

A To ensure London's global competitiveness now and in the future, development proposals should:

- 1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users*
- 2) meet expected demand for mobile connectivity generated by the development*
- 3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation*
- 4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.*

B Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access."


The London Plan acknowledges the importance of digital connectivity. Paragraph 9.6.1 states *"The provision of digital infrastructure is **as important** for the proper functioning of development **as energy, water and waste management** services and should be treated with the same importance... **Fast, reliable digital connectivity is essential** in today's economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration."* (Our emphasis).

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As noted earlier in this document, the application site will provide improved 2G, 3G and 4G technologies to the surrounding area. The Mayor's objective of achieving a "smarter city", as set out in the London Plan, is only possible with a fast and reliable communications network. Paragraph 9.6.9 states: *"Digital connectivity supports smart technologies in terms of the collection, analysis and sharing of data on the performance of the built and natural environment, including for example, water and energy consumption, waste, air quality, noise and congestion. Development should be fitted with smart infrastructure, such as sensors, to enable better collection and monitoring of such data. As digital connectivity and the capability of these sensors improves, and their cost falls, more and better data will become available to improve monitoring of planning agreements and impact assessments, for example related to urban design. Further guidance will be developed to make London a smarter city."*

It is considered that the Applicant's network is an integral element in securing the Mayor's vision for the delivery of high-quality digital connectivity networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in the London Plan.

The London Borough of Bexley

Policy CS09(b) of the London Borough of Bexley's Core Strategy (2012) seeks to *"[make] best use of existing physical infrastructure (e.g. sewerage, water supply, telecommunications, transport) and working with partners to ensure infrastructure networks within the borough contribute to improving the health, safety and wellbeing of Bexley's residents"*. Supporting paragraph 4.3.1 goes on to say, *"enhancing the quality of key physical infrastructure services (transport, water, sewerage, electricity, gas, telecommunications etc) will enable positive improvements to the health, safety and wellbeing of Bexley's residents."* Bexley Council recognises the importance of telecommunications infrastructure on the health, safety and wellbeing of Bexley residents. The application site is required to fill a coverage deficit and will work towards achieving the positive improvements listed in paragraph 4.3.1 for Bexley residents.

The application site is situated on the verge of public highway, alongside Park View Road A207 which is a London Distributor Road. The land that the site is positioned on is not designated, however the application site falls immediately outside of the boundary for Metropolitan Open Land (MOL).

Policies G13, ENV14, ENV15 and ENV16 relate to MOL. These policies do not have bearing on the application site given that it is outside of the boundary.


Conclusion

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In summary, the application is in respect of electronic communications apparatus necessary to improve existing public infrastructure networks.

This statement has demonstrated that the proposal is in accordance with local Development Policy, The London Plan and national planning policy set out in 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, being appropriately designed and located. This statement should be considered in the current climate, where the UK government is encouraging private and public bodies to support improvements in infrastructure to pave the way for the UK to boast a world-class digital infrastructure.

In conclusion, the application merits support and there are no material considerations that indicate otherwise.

Confirmation that submitted drawings have been checked for accuracy


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Signed:		Date:	<u>Thursday 03 June 2021</u>
Position:	<u>Acquisition Surveyor</u>	Company:	<u>Waldon Telecom (on behalf of Cornerstone and above operator)</u>

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