

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Victoria Park Plaza	Site Address:	VICTORIA PARK PLAZA HOTEL, 239 VAUXHALL BRIDGE ROAD, WESTMINSTER, LONDON, SW1V 1EQ
National Grid Reference:	E 529110, N 178890		
Site Ref Number:	13975	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

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: Register not available. Other sources checked.		
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:	No
Date of pre-application contact:	10/11/2020
Name of contact:	N/A
Summary of outcome/Main issues raised: A consultation letter, associated plans and proposed consultation plan were sent to Westminster City Council via email on 10/11/2020. A consultation response had not been received at the time of writing. Lines of communication will remain open throughout the application process.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: The proposal was rated Amber in accordance with the traffic light consultation model in the Code of Best Practice on Mobile Network Development (published 2016). The pre-application consultation plan adhered to best practice guidance. Pre-application consultation was undertaken with the Council Members for Ward in which the site is located. A consultation letter and supporting information was posed or emailed to the consultees on 10/11/2020.			
Summary of outcome/main issues raised (include copies of relevant correspondence): A consultation response had not been received from any of the consultees at the time of writing. Lines of communication will remain open throughout the application process.			

¹ Macro or Micro

School/College

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

The following educational facilities were identified in the local area by using Ofsted data:

- St Vincent De Paul Catholic Primary School, Morpeth Terrace, LONDON, SW1P 1EP
- Westminster Cathedral Choir School, Ambrosden Avenue, London, SW1P 1QH
- Fit For Sport At Queen Mother Sports Centre, 223 Vauxhall Bridge Road, LONDON, SW1V 1EL

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

A consultation letter and supporting information was emailed to the schools on 10/11/2020.

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

A consultation response had not been received from any of the schools at the time of writing. Lines of communication will remain open throughout the application process.

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
Details of response:		
N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:		22\06\2021

3. Proposed Development

The proposed site:

- 3.1 The application site is an operational electronic communications site located on the rooftop of Victoria Park Plaza Hotel in the Plimlico district of the city. The multi-storey building, in use as a hotel and communications site, is approximately 39m high and has a modern external design featuring bricks and glass. The building has a stepped roof-level design with plant rooms and screening on the highest roof level, concealing existing electrical apparatus associated with the building.
- 3.2 Development in the surrounding area is dense and high-level, with uses mainly comprising office blocks and multi-storey residential buildings. Victoria Train Station is approximately 95m west of the site which is contributing to the high demand for mobile services and associated requirement for increased network capacity.

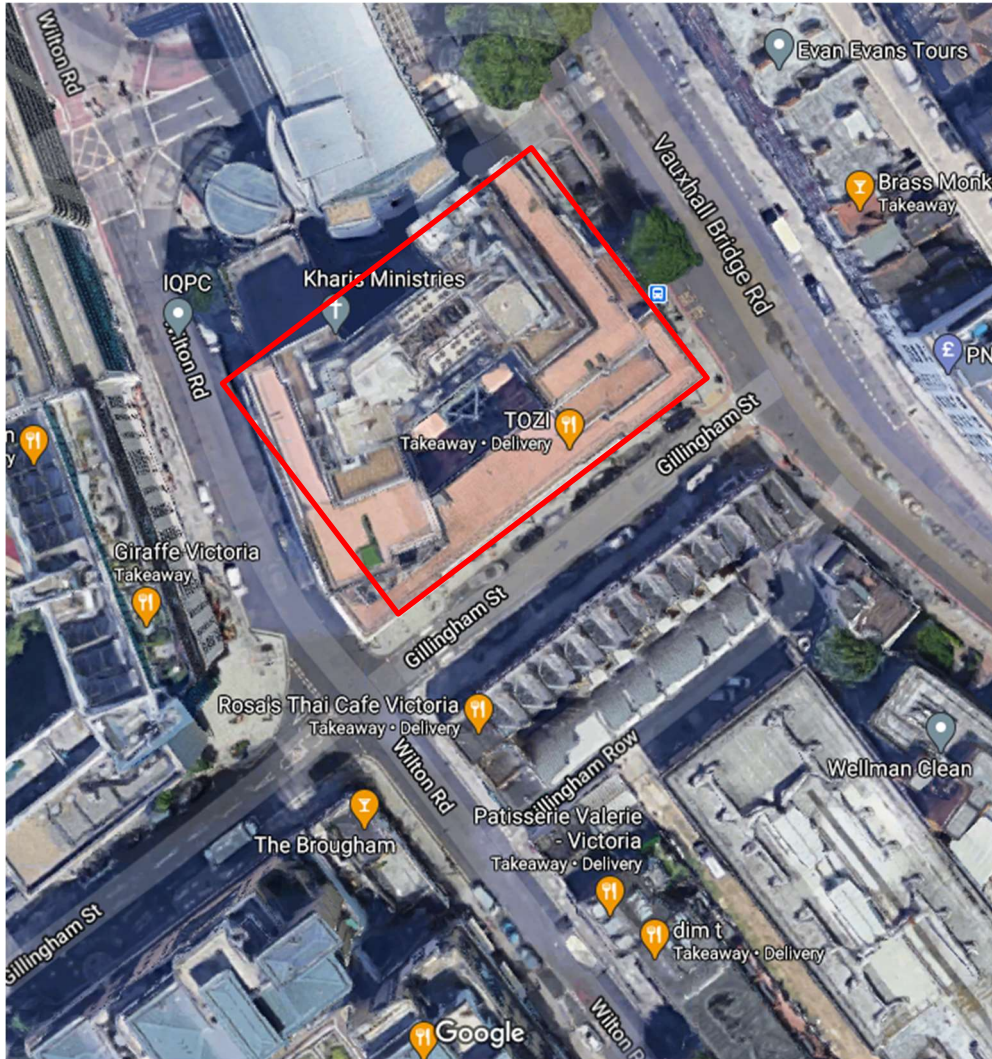


Figure 1. Aerial view of application site. Map source: Google.



Figure 2. Photograph of host building (A)



Figure 3. Photograph of host building (B)

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

Network information is provided separately within this application.

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

Description:

Replacement of 4No. antennas with 6No. antenna apertures mounted across 3No. steel support structures (2No. 41.90m AGL & 1No. 41.35m AGL), 1No. 600mm diameter dish mounted on support pole, 1No. equipment cabinet and screening all at roof-level, plus ancillary development.

Ancillary development includes steelwork, cable feeders, amplifiers and electrical breakout boxes (BOBS). Please refer to submitted plans for full details.

Equipment housing cabinet

1No. AMP5930 cabinet (640x600x2165mm)

Overall Height:	41.90 Meters
Height of existing building (where applicable):	39.69 Meters
Equipment Housing:	see above
Length:	
Width:	
Height:	
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	White/grey antennas & dishes, galvanised steel supports
Equipment housing – type of material and external colour:	Steel coloured Light Grey (RAL 7035)

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

Antennas, dishes & supports

- 3.3 The equipment layout and design are based on the principle of meeting operational requirements of the mobile operators Everything Everywhere (EE) and Three, whilst minimising impact on the appearance of the host building and its surroundings, as far as technical constraints allow.
- 3.4 The base-station has been designed to accommodate replacement apparatus, allowing provision of 2G, 3G and 4G mobile connections to the surrounding area to continue. It has also been designed to accommodate new 5G technology, introducing ultra-fast mobile connectivity capable of operating the 'Internet of Things'. This upgraded and replacement infrastructure will provide higher mobile down-load speeds and more reliable, quicker phone connections. There would be increased capacity to provide services to a higher number of people at the same time.
- 3.5 These improved services can only be upgrading the operational base-station at the application site. This would be done through the installation of a higher number of replacement antennas which must also be larger in scale. This element of the design is informed by the number of communication services being provided (4G, 5G etc.); the fact that the base-station will be multi-operator meaning that both EE and Three require an equal number of antennas; and because of the higher technical capability of the antennas.
- 3.6 The antennas must be allowed to unrestrictedly emit a radio signal, meaning they need to be sited at a high position at the top of the building to enable the radio signal to clear surrounding structures, such as buildings and trees, with the aim of avoiding interference. The radio frequencies that 5G operates at is particularly sensitive to interference from solid objects, which necessitates securing the antennas to elevated steel support frames. The two most visually prominent antennas clusters would benefit from screening, ensuring that the concealed apparatus would not be visible from the public realm.

3.7 The layout of the antennas is informed by physical constraints of the rooftop and local area, and the outcome of software modelling which positions the antennas in such a way that they collectively provide 360-degree coverage to the surrounding area. Similarly, the dishes must connect to other base-stations in the wider network by microwave link. As such, they require 'line of sight' which an unobstructed path to neighbouring base-stations.

3.8 The aforementioned factors have informed the design of the proposed equipment which is of the minimum amount and scale possible, while still meeting structural and radio planning requirements.

Equipment cabinets

3.9 The antennas must connect to the proposed and existing equipment housing cabinets by electrical cable feeders. The equipment cabinets, an essential component of the base-station, and must be located as close to the antennas as possible in order to minimise electrical power losses during operation.

3.10 The scale and location of the proposed single cabinet in the context of the building, means that they would it be highly visible from ground-level, nor greatly affect it the appearance of the building.

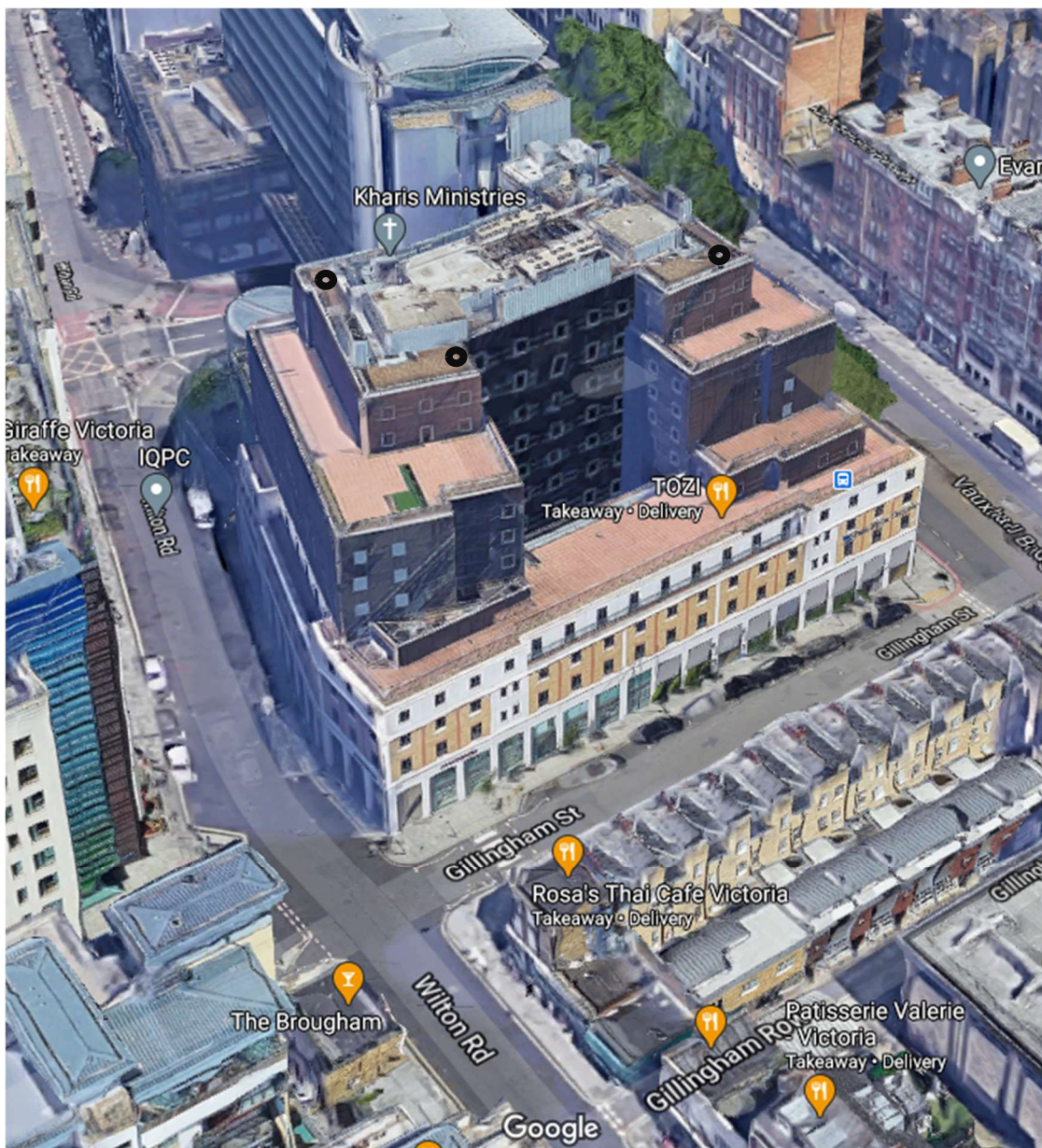


Figure 4. 3D image of application site – antenna clusters denoted approximately (black circles). Map source: Google.

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, EE and Three operate their 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 EE and Three’s networks, 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 that 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>		

4. Technical Justification

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

Replacement coverage

- 4.1 The principle aim of the proposal is to replace communications coverage from an operational base-station which was decommissioned due to reasons beyond the operators' control. Everything Everywhere (EE) and Three – two of the major licenced mobile operators in the UK – previously provided communications services from apparatus on the roof of No.11 Belgrave Road. The existing site is an office block which is earmarked for redevelopment plans, necessitating permanent removal of the communications apparatus. This has caused need to find an alternative site to accommodate the base-station. See Figure 5 (p 9).
- 4.2 The proposal is required in order to allow the replacement provision of 2G, 3G and 4G mobile connections to the surrounding area. The consequence of not doing so is that users of the network may find that the services they previously had access to are either limited or removed. The provision of poor communication services has well recognised economic and social impacts on communities and businesses.

Enhanced services

- 4.3 The base-station would also provide new 5G services, introducing ultra-fast mobile connectivity capable of operating the 'Internet of Things'. This upgraded and replacement infrastructure will provide higher mobile download speeds and more reliable, quicker phone connections.
- 4.4 Importantly, the base-station would provide increased network capacity, allowing quality service provision to a higher number of people at the same time. Improving cellular connectivity is led largely by demand. The very high level of mobile phone use in the UK requires the installation of additional/upgraded base stations to provide the necessary connections.
- 4.5 Ofcom's 2018 Communications Market Research Report shows that smartphones are owned by four of every five UK consumers. While take-up of fixed broadband has plateaued at 80%, accessing the internet on a mobile phone continues to grow, from 66% in 2017 to 72% in 2018. Demand for data continues to grow rapidly for UK consumers, with 1.9GB consumed by an average mobile subscription per month in 2017, (up from 1.3 GB the previous year). The report found that more than seven in ten now use their mobile to access the internet.
- 4.6 The expectations are that future telecoms technology will support government policy regarding digital inclusion; improvements in health and social care; assisting in local economic growth; advancing the development of Smart Cities and supporting innovative uses throughout the transport sector for both personal and public travel. In addition, EE (UK) Ltd will be supporting the communications requirements of Emergency Services where further rollout and improvements in the 4G signal is currently being progressed.

Coverage plots

- 4.7 Figure 4 (p 9) is an extract from radio modelling software demonstrating the impact on network coverage since the former base-station was decommissioned. Figure 5 models that the proposal at the application site would suitably replace the lost coverage, when operating alongside other network modifications. The images show indoor 3G coverage from Three's equipment. Full coverage charts for both operators are enclosed with the application.

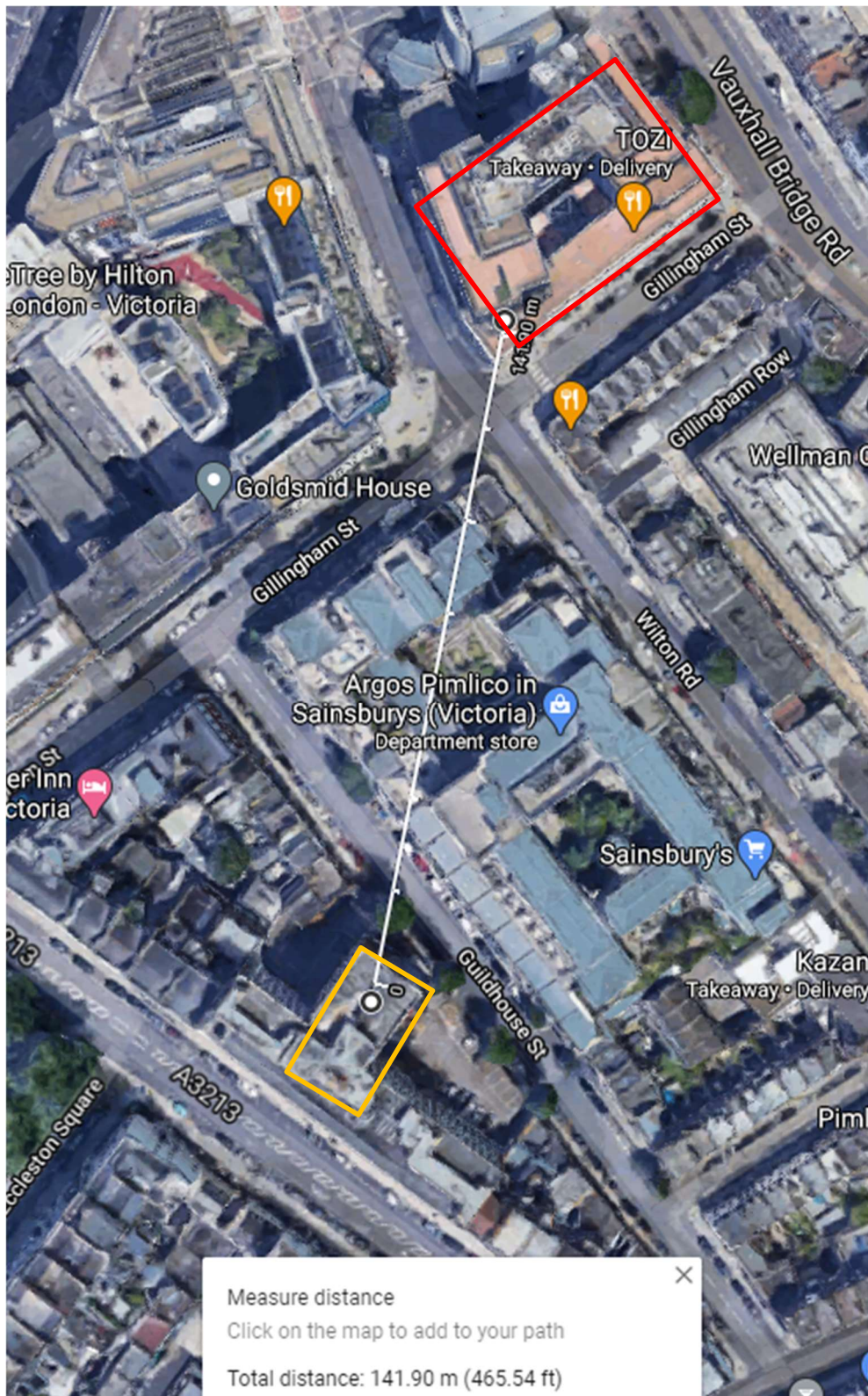


Figure 5. Application site (red) in relation to base-station to be replaced (orange). Map source: Google.

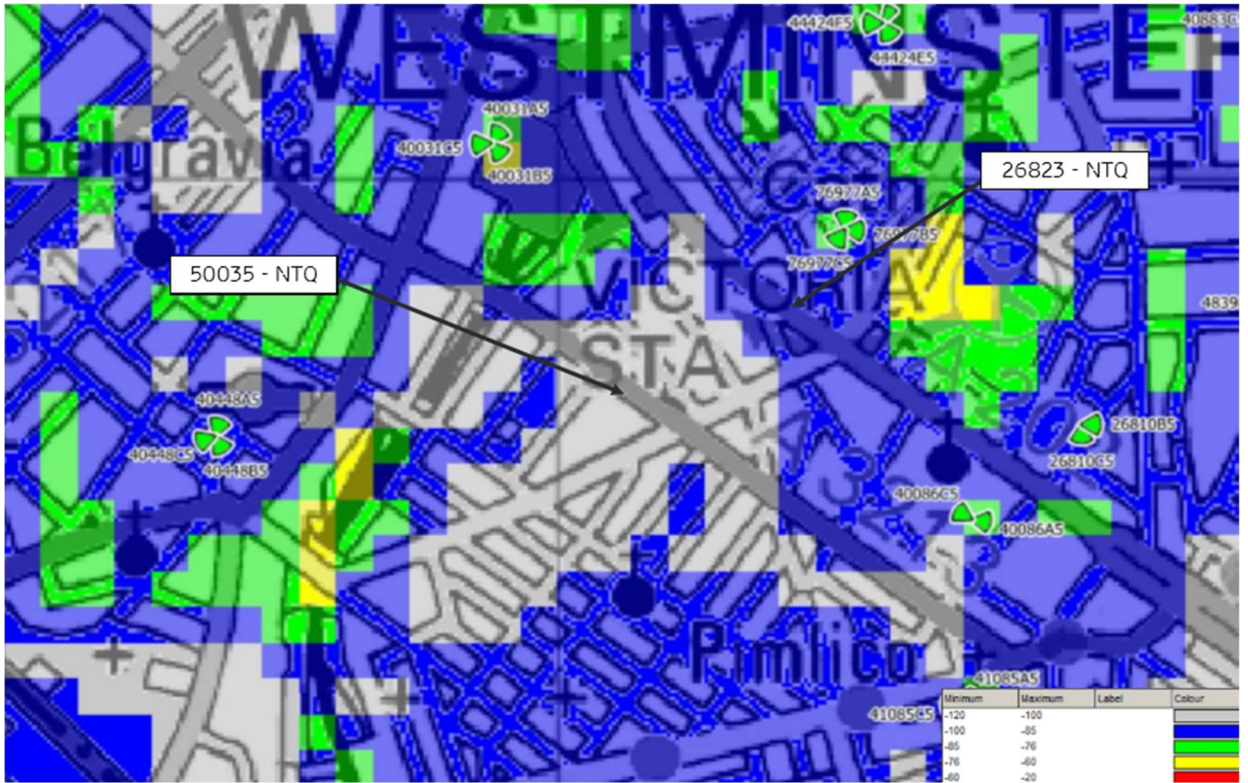
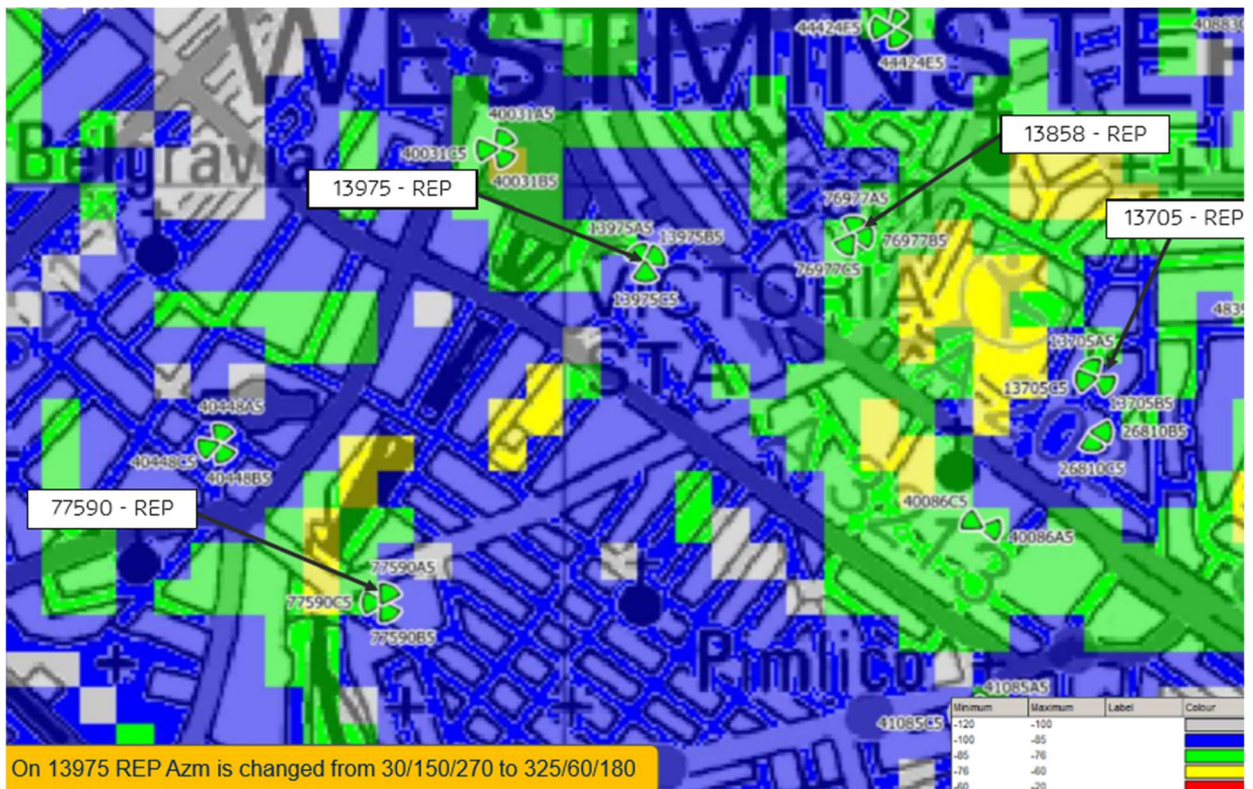


Figure 6. Coverage when base-station at Belgrave Road, and a secondary base-station, are lost from network



On 13975 REP Azm is changed from 30/150/270 to 325/60/180

Figure 7. Coverage with replacement base-station at application site (REP 13975), working alongside other network modifications.

5. Site Selection Process

- 5.1 In accordance with planning policy, a sequential approach to site selection was adopted. The opportunity to meet network requirements by upgrading an existing electronic communications site was given preference over establishing a new communications site in the local area.
- 5.2 The application site was selected following a thorough search and detailed investigations. The decision factored multiple considerations, including:
- distance from the base-station it will replace;
 - design of the building, including height and roof-design;
 - ability to acquire roof-space;
 - physical access to build/maintain the base-station;
 - potential for neighbouring buildings & trees to obstruct radio signal;
 - minimising environmental impact, including protecting heritage assets.
- 5.3 Site location is critical in network planning and becomes even more so when there is need to replace an existing base station already operating within the established cellular pattern. When an existing site is lost, it leaves a very specific and unique gap in the network, much like removing a piece from a completed jigsaw would. This gap needs to be re-filled if users living and working within in area are to be able to continue to use their mobile phones and other wireless devices. This places even greater limitations on the potential siting opportunities, as many locations will not enable this specific gap to be adequately filled. The application site is a short distance to the site is will replace, enabling the existing coverage pattern to be nearly replicated.
- 5.4 The design of a host building is also key. The building serves as an elevated platform from which radio coverage is provided to the surrounding area, as such the building must be sufficiently high to enable the radio waves to clear surrounding structures and reach the targeted areas. Likewise, the roof-top of the building must meet design parameters with respect to having the available space to accommodate the equipment, a flat roof design, and the structural strength. The application site is suitable with consideration to these criteria.



Figure 8. Photograph of application site rooftop, showing elevated position for radio coverage

5.5 The area within which the replacement site must be located, in order to replace the existing coverage pattern effectively, features multiple Conservation Area designations and nationally listed buildings. These heritage assets and their settings were avoided during site selection to ensure their protection; however, consequently this constrained the number of site options.

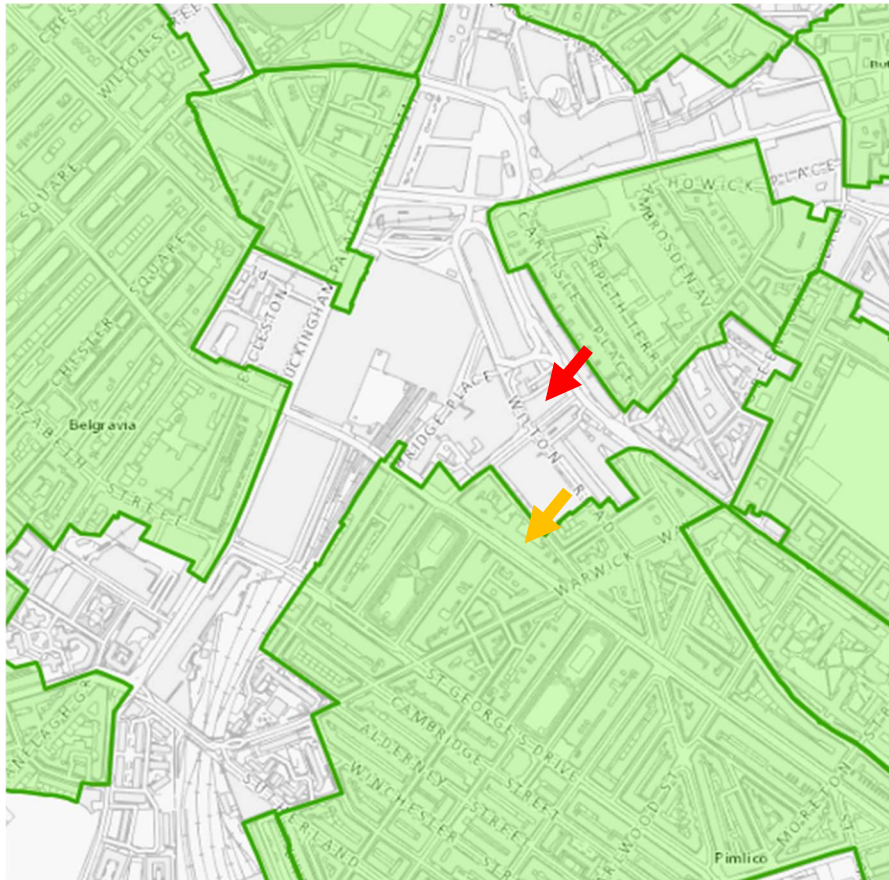


Figure 9. Application site (red) & base-station to be replaced (orange) in relation to conservation area designations. Image Source: Westminster City Council

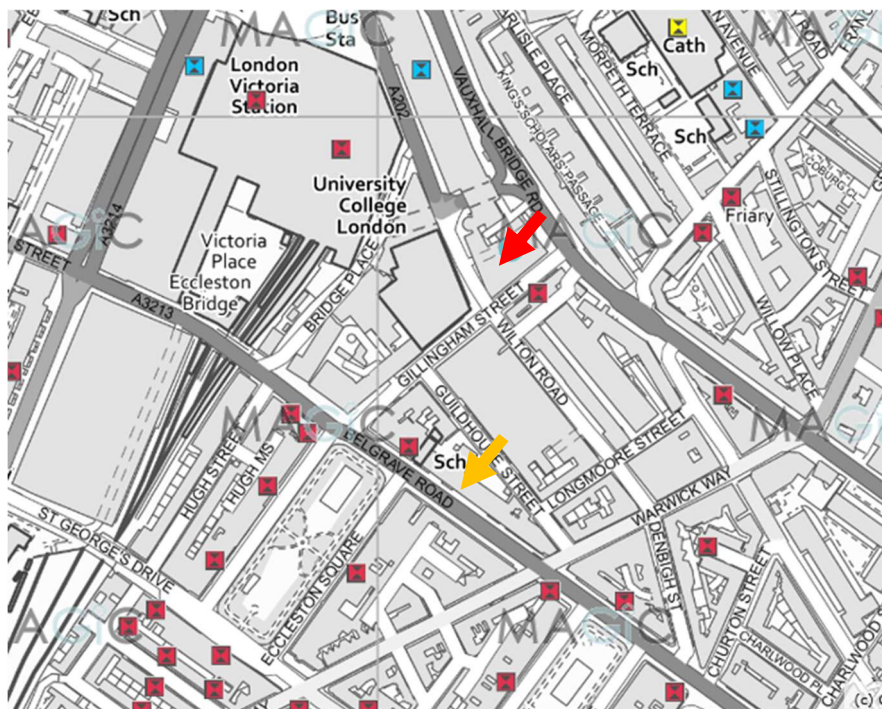


Figure 10. Application site (red) & existing base-station (orange) in relation to nationally listed buildings. Image Source: Magic Maps.

Alternative sites considered and not chosen:

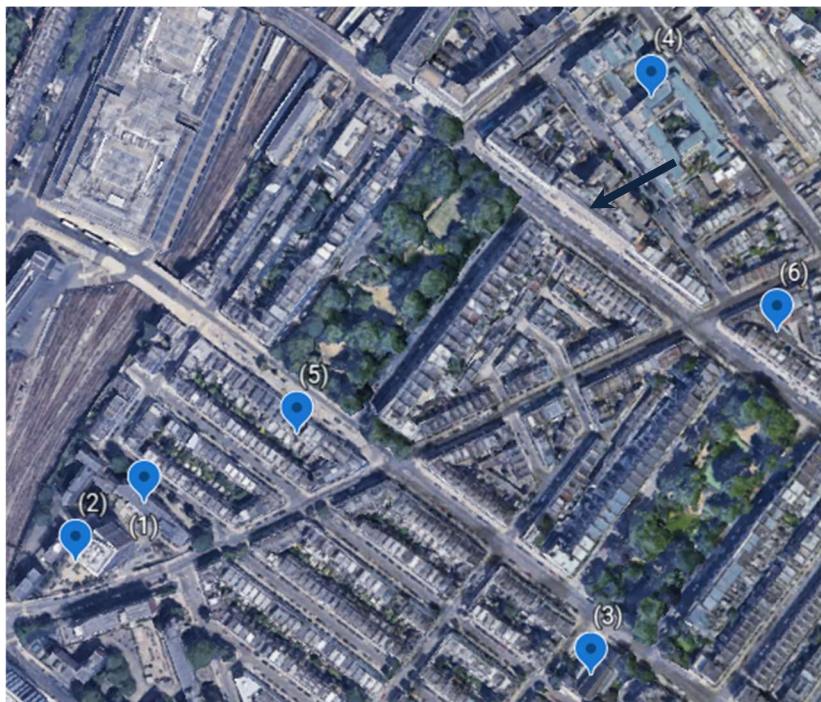


Figure 11. Alternative sites considered. Image Source: Google Maps

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
Rooftop	(1) Dryburgh House, Abbots Manor Estate, Warwick Way, London, SW1V 4ET	528771, 178491	This building meets many of the site selection criterion, however the higher height of the application site building was found to be preferable with respect to providing effective replacement radio coverage.
Rooftop	(2) Glastonbury House, Warwick Way, London, SW1V 4ET	528750, 178467	This building was found be an unsuitable host for the proposed apparatus because of its design. The building height is too high to allow the radio antennas to fill the predicted coverage gap.
Rooftop	(3) St Gabriel's Church, Pimlico, Warwick Square, London, SW1V 2AD	497669, 179948	This building was considered to be less preferable than the application site because of its grade II* listing and location within a conservation area. Siting apparatus here would have greater risk of harming heritage assets.
Rooftop	(4) Mixed-use development including 107 Wilton Road, London, SW1V 1DZ	529108, 178766	This large mixed-use development, made-up of residential apartments and ground-floor retail units, was discounted because of its roof design. It features pitched roofs instead of the elevated flat rooftop required to accommodate the proposed apparatus.
Rooftop	(5) Buildings on Warwick Way	N/A	Buildings on Warwick Way are lower in height than the application site and mostly houses. They would therefore be unsuitable or inferior. Furthermore, the majority of Warwick Way is in the conservation area, unlike the application site which outside of such designations.

Rooftop	(6) Buildings on Belgrave Road	N/A	In a similar respect to Warwick Way, the buildings on Belgrave Road are within the conservation area and many have listed status. The majority of the buildings are also low-level residential houses which are not compatible with hosting communication apparatus. While a building on this road may have been preferable with respect to being closer to the base-station which is to be replaced, a suitable candidate could not be identified.
Rooftop	(7) Furness House, Warwick Way, SW1V 4JN	528756, 178418	In March 2020, Westminster City Council approved the installation of communications apparatus onto the roof of this building (ref. 20/01204/TELCOM). The proposal at the application site will work alongside the approved proposal at Furness House to replace coverage which is to be lost from the base-station at No.11 Belgrave Road.
If no alternative site options have been investigated, please explain why:			
N/A.			

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

Environmental Considerations

- 6.1 The application site does not fall within any environmental or heritage designation, such as a Conservation Area. The host building is not listed. Importantly, the proposal would ensure continued and improved communication services to the residents, visitors and businesses in the surrounding area, without impacting the heritage of the many listed buildings and conservation areas in the local area. See Figures 5 & 6.
- 6.2 The proposed apparatus would be viewed in the context of a large-scale multi-storey building located in an urban setting. The equipment should not appear alien, nor dominate the building and its surroundings owing to the layout of the apparatus, mostly set back from the edge of the building. It is assessed that the resulting magnitude of visual change would be moderate. Likewise, the proposal would not impact the amenity of residents.
- 6.3 The proposal amounts to a minor change to the appearance of the host building which should be weighed against the far reaching environmental, economic and social benefits of the upgraded base-station, which would serve thousands of people in the surrounding area, including local residents, business and commuters.



Figure 12. Photo of host building from street-level.

Planning Policy

Development Plan

6.4 Relevant sections of the authority's Development Plan come from the Westminster City Plan (adopted 2016) and the Mayor's London Plan (adopted 2016). The proposal is to replace and improve communications infrastructure, making the following policies particularly relevant:

Westminster City Plan

Westminster City Plan

Consolidated with all changes since November 2013



I WESTMINSTER'S SPATIAL STRATEGY – INFRASTRUCTURE

*'Westminster's success as a world city and its triple roles as a place to live, commercial centre and tourist attraction places heavy demands on the infrastructure required. **Residents and businesses alike need good utilities provision, transport networks, open spaces and social and community facilities.**'*

(para. 2.44)

'Utility companies have also engaged with the council, including discussions to enable them to continue to deliver services in the light of projected growth and development...'

*Delivery of **improved communications** is also necessary to enable Westminster, and London as a whole to compete internationally.'* (para. 2.53)

London Plan 2021

I POLICY D2 – INFRASTRUCTURE REQUIREMENTS FOR SUSTAINABLE DENSITIES

*"Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), **boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time**"*
(part B)

I Policy SI 6 – DIGITAL CONNECTIVITY INFRASTRUCTURE

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

*(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***

*"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. London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. **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." (para. 9.6.1)*

"London's capability in this area is currently limited by a range of issues, including the availability of fibre and the speeds delivered... Further work will be done to accurately identify locations in the capital where current connectivity provisions are not suitable for the needs of the area."

Better digital connectivity with a focus on capability, affordability, security, resilience and the provision of appropriate electrical power supply should be promoted across the capital. The specific requirements of business clusters, such as a symmetrical-capable service with the same upload and download speeds, should also be met" (para's 9.6.2 & 9.6.3)

"Development proposals should also demonstrate that mobile connectivity will be available throughout the development and should not have detrimental impacts on the digital connectivity of neighbouring buildings" (para. 9.6.5)

Other Local Policy

City for All – Vision and Strategy

6.5 Westminster is the home to Government and the Royal Family. It has the highest economic output of any local authority, the largest night time economy in the UK and it is the largest employment centre in the UK, with 51,400 businesses and 255,000 residents, a population which swells to 1.1m with the daily influx of workers, shoppers and tourists.

6.6 To protect and promote this important economy, Westminster has developed a series of initiatives such as their City for All Vision and Strategy 2020/212, which sets out its 'smart city' aspirations and how superfast broadband is a vital facilitator to the economy and employment. The Vision also commits to a trial for the integration of innovative smart city technologies, including enabling 5G infrastructure.

*'Westminster will be one of the **best connected** and most technologically advanced cities in the world. We will harness new technologies to make us the easiest council in the UK to do business with... We will ensure that **internet connection speeds** and access across Westminster are unrivalled by any other major city'* (p23)

*'We will also support our entrepreneurs and businesses by enabling and encouraging **outstanding digital infrastructure**'* (p24)

*'Trial the integration of innovate smart city technologies. The trial will include the use of road sensors to manage light levels, improve safety and ease traffic flows. It will also include **enabling 5G infrastructure** and electric vehicle charging facilities across the city'* (p25) (emphasis added)

Economic Development Strategic Framework

6.7 The Economic Development Strategic Framework³ identifies infrastructure as a theme which will affect Westminster's approach to economic development. The framework details that the renewal and expansion of key utilities networks will be a critical infrastructure priority, in the context of meeting Westminster's infrastructure needs being a key contributor to national prosperity.

*'While the renewal and expansion of key utilities networks – **particularly high speed broadband** – will be a critical infrastructure priority in the medium term. We will work with London and national government to influence regional and national infrastructure planning and advocate for Westminster's infrastructure needs to be adequately met as a **key contributor to national prosperity.**'* (p13)

Enterprise Programme

6.8 Under the Economic Development Framework sits the Enterprise Programme 2015-2019, which has a section advocating long-term policy solutions to enable superfast broadband, and specifically 5G.

*'According to the Federation of Small Business, **broadband quality and availability is one of the most important issues facing small businesses.** It is particularly important in Westminster with so many firms in sectors such as media, design, digital and telecoms, conducting the majority of their business online'*

² City for All Vision and Strategy 2020/21: <https://www.westminster.gov.uk/city-for-all>

³ The Economic Development Strategic Framework (2015) & Enterprise Programme: <https://www.westminster.gov.uk/economic-development>

Other ideas the council is actively considering include... promoting schemes that support improved internet connections... and improving understanding of the implications of new technologies, such as **mobile broadband '5G'** (p40)

National Policy

National Planning Policy Framework



National Planning Policy Framework

6.9 The government sets out its national policy objectives for electronic communications in Section 10 'Supporting high quality communications' of the National Planning Policy Framework (February 2019) (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 technology (such as 5G) and full fibre broadband connections.**' (para. 112)*

*'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.'*

UK Digital Strategy



6.10 The UK Digital Strategy, published by the Department for Digital, Culture, Media & Sport in March 2017, provides evidence of the public benefits of communication services:

'Broadband and mobile must be treated as the fourth utility, with everyone benefiting from improved connectivity. This will play a crucial role in ensuring that everyone, wherever they live and however they connect, can make full use of digital services and benefit from participation in the digital economy. Improved connectivity also increases innovation and productivity across the economy, bringing significant economic rewards'

'5G is the next generation of mobile connectivity, and is currently in development. It is expected to represent a significant upgrade: providing **ultrafast, low latency, and more reliable mobile connectivity, able to handle our ever-increasing data requirements.** This should present huge opportunities to boost productivity and grow the economy. In addition to giving consumers and business users high quality connectivity, it will also support the development of the **Internet of Things: the rapidly-increasing number of connected devices, from connected cars to digital health applications.**'

Future Telecoms Infrastructure Review



6.11 The Department for Digital, Culture, Media & Sport published its findings of the Government's Future Telecoms Infrastructure Review in 2018. The review highlights the important and far reaching role of 5G infrastructure:

'Alongside finishing the roll out of 4G networks to meet existing mobile demand, we want the UK to be a world leader in 5G to take early advantage of this new technology. We have set a target that the majority of the population will have 5G coverage by 2027.'

'The technical capabilities and performance characteristics of 5G are clear. 5G is expected to deliver faster and better mobile broadband services to consumers and businesses, and to enable innovative new services for industry sectors, including manufacturing, transport, immersive technologies and healthcare.'

(p 10)

Ofcom reports



6.12 Ofcom's annual Communications Market Reports identified trends which demonstrate reliance on reliable mobile connections:

Communications Market Report 2019

'We all need high-quality communications. In the modern world, a huge amount of our time is spent using communications services: for work, to stay in touch with family and friends, and in order to go about our daily lives. Our ability to access and use reliable mobile and broadband connections has become fundamental to the way we work and live, and to the ability of businesses of all sizes to thrive. For many people, internet connectivity is now as essential as gas or electricity, and access to traditional television, radio, fixed phone lines and postal services continue to remain important.'

(2016 report)

Policy Appraisal

- 6.13 Planned economic and residential growth cannot be sustained without the provision of essential utility infrastructure, including access to reliable, resilient and high-speed electronic communications. The proposal would replace and increase the capacity of an existing base-station to enable it to more effectively serve a higher number of people.
- 6.14 The Westminster City Plan acknowledges that the success of the city places heavy demands on infrastructure; and delivery of improved communications is explicitly identified as a necessity to “enable Westminster, and London as a whole to compete internationally” (para’s 2.44 & 2.53). The vision and objectives of the Development Plan can only be delivered by securing the necessary infrastructure, including utilities.
- 6.15 The London Plan 2021 has unambiguous support for the provision of advanced electronic communications. Policy D2 is material to the application proposal with respect to increasing the “capacity” of the Telefonica’s radio network to meet a high demand for services.
- 6.16 So is Policy SI 6 with respect to the significant socio-economic benefits of digital infrastructure which is of material consideration in itself. The policy recognises that London’s digital capability is currently restricted and there is need to identify locations where provision is adequate – the area surrounding the application site is one such location which the Operator has identified as requiring improvement. This proposal would deliver on this policy.
- 6.17 It is also significant that suitable mobile connectivity is a policy criterion in assessing applications for new development proposals (para. 9.6.50). This means that inadequate connectivity, which could factor coverage availability and network capacity, would hinder the approval prospects of developments plans in the area local to the application site. This has important socio-economic implications for the local area including the growth ambitions Ilford Lane centre.
- 6.18 The Operators would provide replaced and improved communications capability by establishing a building-based telecommunications site, as part of a site-sharing arrangement. New capability would be provided without establishing a new additional ground-based mast. The proposal therefore adheres to para. 133 of the NPPF.

Other Material Considerations

6.19 The following are examples of appeal decisions by the Planning Inspectorate where the Inspector awarded considerable weight to the public need for communications infrastructure, with respect to maintaining and improving network coverage/capacity, and with respect to the reliance on mobile communications during the Covid-19 pandemic. The proposal at the application site is required in order to meet the same objectives. Most of these cases relate to installation of ground-based masts located inside conservation areas, sited near to listed buildings. The application proposal does not have such constraints. The appeals listed below were all allowed.

1) APP/A1910/C/20/3256772 & APP/A1910/C/20/3256773 - Telefónica UK Limited Vs. Dacorum Borough Council (December 2020)

'The reliance on telecommunications has been tested and heightened during the current Covid-19 pandemic with the whole country subject to lockdowns and various restrictions. This has meant people have been being advised to work remotely from home wherever possible; education at schools, colleges and universities has depended more on on-line teaching and learning; there has been increased dependency for shopping and medical and other appointments. There has also been increased use and dependency on accessing and using mobile devices for social interaction and staying connected with friends and family, especially important for those who have been shielding or who are self-isolating.

*The government's advice during the pandemic recognises that "Now, more than ever, the country is reliant on fixed line and mobile communications networks. And as a result, **telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak**"*

2) APP/V5570/W/20/3251047 - Telefonica UK Limited Vs. Council of the London Borough of Islington (November 2020)

*'there would be a considerable public benefit arising from the provision of improved digital communications networks in this busy commercial area, and I consider that this carries **significant weight.**'* In exploring the planning balance, the inspector found *'the proposal would fail to preserve or enhance the character or appearance of the Bunhill Fields and Finsbury Square Conservation Area, and would cause less than substantial harm to the significance of the Conservation Area as a designated heritage asset.*

*In this respect I have also found conflict with planning policies, and indeed the proposal would conflict with the development plan as a whole' and 'However, **I have also found that a significant public benefit would be delivered through the provision of improved mobile communications networks, which would outweigh the limited harm to the heritage asset which I have identified.***

The material considerations therefore indicate that, in this case, the proposal should be determined other than in accordance with the development plan.'

3) APP/Q3305/W/18/3206555 – Vodafone Vs. Mendip District Council

*'Government policy, as set out in the Framework states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being... I have found that **there is a need for the proposal which therefore weighs strongly in its favour.... I conclude on this issue that despite the less than substantial harm that would be caused, the public benefits of the proposal would outweigh that harm.**'*

4) APP/M5450/W/17/3180345 - CTIL and Telefónica (O2) Vs. the London Borough of Hillingdon

*'The Framework sets out the importance of an advanced highquality communications infrastructure for sustainable growth and makes specific reference to the development of high speed broadband technology. This is reflected in the London Plan and the public benefit arising from the improvement of the telecommunications infrastructure is a material planning consideration that weighs in favour of the proposal. **Taking account of all matters I have concluded that the limited harm caused to the significance of the heritage asset (the CA) would be outweighed by the public benefit that would arise from improving the communications infrastructure'***

Summary

- 7.1 The application seeks planning permission for the installation of proposed communications equipment to be installed at Victoria Park Plaza Hotel. The principle aim of the proposal is to upgrade an operational base-station to enable it replace communications coverage from another base-station which is to be decommissioned. In addition to replacing coverage, the proposal will also result in improved communication services including by increasing the capacity of the network and by the introducing 5G technology.
- 7.2 Everything Everywhere (EE) and Three – two of the major licenced mobile operators in the UK – presently provides communication services to the surrounding area from apparatus on the roof of No.11 Belgrave Road. The existing site is an office block which is earmarked for redevelopment plans, necessitating permanent removal of the communications apparatus.
- 7.3 The application site was found to be suitable replacement building. Specifically, the building is in close proximity and comparable height to the building it will replace, enabling the existing coverage pattern to be closely replicated; there is confidence that roof space can be acquired; and the site is accessible and outside of designations such as conservation areas. The equipment layout and design are based on the principle of meeting operational requirements of the mobile operators, whilst minimising landscape and visual impact as far as technical constraints allow. The apparatus would be setback from the edge of the building, ensuring that its appearance is not unduly affected.
- 7.4 The proposal would not only ensure that a high number of local residents and businesses do not experience a loss, or poorer connectivity for their mobile devices, it would also provide upgraded services. Modern communication services have evident social, economic and environmental implications. This includes the mobile's role in providing social and digital inclusion to communities; economic competitiveness by serving businesses in the area; and supporting sustainability objectives such as enabling homeworking, reducing transport congestion and greenhouse gas emissions.

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