

SUPPLEMENTARY INFORMATION

Background:

The Government published a technical consultation on proposed amendments to the General Permitted Development Order for electronic development to support the deployment of 5G. This follows the 2019 consultation on the principle of these proposed reforms.

The latest consultation seeks views on proposed planning reforms to amend permitted that will allow the deployment of telecoms equipment to be quicker whilst ensuring that there are appropriate environmental protections and safeguards in place.

The consultation which is now closed can be viewed at: <https://www.gov.uk/government/consultations/changes-to-permitted-development-rights-for-electronic-communications-infrastructure-technical-consultation/changes-to-permitted-development-rights-for-electronic-communications-infrastructure-technical-consultation>

Permitted development rights for electronic communications infrastructure are a critical element in the planning regime for streamlined and cost-effective deployment of telecommunications infrastructure. They benefit both mobile network operators and local planning authorities in the effective management of limited time and resources. Permitted development rights also facilitate investment in network infrastructure resulting in improved service to customers, and help in delivering significant socio-economic benefits to society both nationally and locally.

Matt Warman, Minister for Digital Infrastructure wrote to all Local Authority Chief Executives in May 2021. The letter set out the Governments position in respect of 'digital connectivity' stating:

"Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data is increasing rapidly, and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality mobile connectivity.

The Government is committed to extending mobile network coverage across the UK and providing uninterrupted mobile signal on all major roads, and our ambition is for the majority of the population to have access to a 5G signal by 2027. Last year we agreed a £1 billion Shared Rural Network deal with the UK's mobile network operators to extend 4G mobile geographical coverage to 95% of the UK by 2025.

The Government is also investing £200 million in a programme of 5G testbeds and trials to encourage investment in 5G so that communities and businesses can benefit from this new technology. The increased capacity, reliability and functionality offered by 5G is opening-up the potential for new, innovative services for individuals and increased productivity for industry".

1. Site Details

Site Name:	Old Bexley Riding School	Site Address:	Old Bexley Ridng School Off Stable lane Vicorage Road Bexley DA5 2AP
NGR:	E:549920 N:172950		

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

Site Ref Number:	CTIL_24220320	Site Type: ¹	Macro
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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 an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	
If no explain why: N/A		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	02.09.2020
Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: Pre-application consultation letters and drawings of the proposals were sent on the 02.09.2020. As stated above an application was subsequently made and withdrawn following non determination.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline Consultation carried out: Prior to the submission of this application the applicant-initiated pre-consultation discussions with the local planning authority and stakeholders. This provides an opportunity for the LPA and stakeholders to discuss the development proposals and identify specific issues early. Consultation with St Mary's and St James Ward Councillors, AM Gareth Bacon and MP James Brokenshire. Pre-application consultation letters and drawings of the proposals were sent on the 02.09.2020.			

¹ Macro or Micro

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

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

No site specific comments at the time of making the application.

School/College

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

- None nearby in terms of the Code of Best Practice.

Outline of consultation carried out with school/college (include copies of main correspondence):

N/A

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

N/A

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?		N/A no aerodrome with 3km
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		N/A no aerodrome with 3km
Details of response:		
N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	19.07.2021	
	(via Tracked Email – Copies of the notice and delivery receipts form part of the planning submittal pack)	

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3. Proposed Development

The proposed site:

Background:

Cornerstone is the UK's leading mobile infrastructure services company. We acquire, manage, and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. We oversee works on behalf of telecommunications providers and wherever possible aim to:

- promote shared infrastructure
- maximise opportunities to consolidate the number of base stations
- significantly reduce the environmental impact of network development

As part of Telefonica's network improvement program, there is a specific requirement for a radio base station at this location to provide upgraded 4G provision as well as new 5G services to the area.

The site

This application relates to a new telecommunications installation at Old Bexley Equestrian Riding School shown on the photograph below:



Image 1: The application site

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

The proposal is for proposed installation of 17.50m monopole supporting 6 no antenna on an open headframe, 2 no dishes, together with ground-based equipment cabinets and ancillary development thereto.



Image 2: Birdseye view of the application site

The application concerns the corner of a field to the rear of agricultural buildings. Old Bexley Riding School is not within Article 2(3) land or the setting of a listed building. The site is within Metropolitan Open Land as detailed in Image 3 below:

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Registered Address:
Cornerstone Telecommunications, Infrastructure Limited,
Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.
Registered in England & Wales No. 08087551.
VAT No. GB142 8555 06


 Cornerstone, Hive 2,
1530 Arlington Business Park,
Theale, Berkshire, RG7 4SA



Image 3: Extract from Proposals Map







-  Boundary of the London Borough of Bexley on this plan
- Environment**
-  [Metropolitan Green Belt](#)
-  [Metropolitan Open Land](#)
-  [Boundary of South East London Green Chain](#)
-  [Urban Open Space](#)
-  [Educational Buildings and Playing Fields](#)

Image 4: Extract from Proposals Map Legend

An installation in this location will ensure that the latest high quality 2G, 3G and 4G service provision is maintained and enhanced with new 5G services in and around Vicarage Road and Littleworth Business Centre.

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The proposed development is within the limits set out in Part 16 for permitted development with Prior Approval. The location enables the whole of the surrounding area to benefit from improved 5G network coverage and has been designed to be future proof, thus enabling other technologies to be deployed depending upon the demand required. As the shift in demand is expected for the foreseeable future and that as central Government considers digital communications to be a critical national infrastructure, the operator intends to support customers and local residents by ensuring as little disruption as possible.

As 5G is to deliver new technology, so too the infrastructure required is different than that necessary to provide the previous generations of connectivity.

The Covid-19 pandemic has created unparalleled demand and pressure on the operator's network while people try to keep life and the economy moving through isolation and containment measures, with many people now working from home or remotely. This is a perfect example of why the operator must continue with its rollout as streamlined as is possible.

For the first time in history, all of the mobile networks sent out a government message to their customers with details of the new shutdown measures. The message from 24 March 2020 reads: 'GOV.UK CORONAVIRUS ALERT. New rules in force now: you must stay at home. More info and exemptions at [gov.uk/coronavirus](https://www.gov.uk/coronavirus) Stay at home. Protect the NHS. Save lives'. Even the World Health Organisation launched a WhatsApp chatbox allowing people to get instant information about the coronavirus through the smartphone messaging application. None of this would be possible without the physical infrastructure associated with mobile phone industry such as masts, antennas, microwave dishes and cabinets.

The importance of mobile connectivity during the pandemic was reinforced by DCMS in succinct advice to local authorities and operators published on 02/04/20: '*Government recognises the ongoing importance of the telecommunications industry at this critical time. Now, more than ever, the country is reliant on fixed line and mobile communications networks. 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.*' The advice sets out (albeit in relation to emergency access provision) that '*Fully operational telecommunications infrastructure is needed to support mass homeworking and critical connectivity to emergency services and hospitals. Network operators must be able to rectify network outages promptly and to mitigate any effects of network degradation over the duration of this emergency period.*'

On 13/05/20, MHCLG advised that '*site visits and the use of digital technology and virtual meetings should become the norm in planning casework.*' (MHCLG coronavirus update 13/05/2020). Lord Greenhalgh clarified: '*Local planning authorities and the Planning Inspectorate drive the planning process forward and should ensure that it continues to operate effectively to support economic recovery. Moving to digital events and processes will be critical. This means adapting to working virtually, including virtual hearings and events (such as using video-conferencing and/or telephone) and making documents available for inspection online. The Government expects everyone involved in the planning process to engage proactively.*' (MHCLG Written Statement HLWS231, 13/05/20).

Given the increasing extent of mobile only online access in households across the UK, the importance of continued mobile connectivity is highlighted to enable public participation in planning committees and other online activities, for example.

In a statement issued 22/06/20, MHCLG confirmed measures to "*enable development which has already received the grant of planning permission or listed building consent and would lapse between 23 March and 31 December 2020 to be extended until 1 April 2021*".

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Digital Infrastructure Minister Matt Warman in his Keynote Speech at 'Connected Britain 2020' provided the latest endorsement from Central Government on the importance connectivity. He stated:

"The theme this year is the future of UK connectivity. But before I talk about that, I'd like to take this opportunity to thank everyone in the industry for their tireless efforts at keeping us all connected through an unprecedented period of disruption.

You have kept 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. Without a good connection, I would not be able to join you all at Connected Britain. Thank you.

In my speech, I am going to touch upon the exciting work that the Government is doing on broadband and 5G, and also the efforts that we are taking to make these networks more secure for the long term.

But, first, I thought that I would reflect on the changed times that we are living in. COVID has altered the way we live, work and, most importantly, stay connected with our family and friends. 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. Many of these changes - such as increased working from home - will stay with us for the foreseeable future.

People in this sector have long referred to the internet as "the fourth utility" - and it's true. For countless people across the country, having fast and reliable broadband and a good mobile connection is as essential and vital to our daily lives as gas, water and electricity".

The Digital Infrastructure Minister stated that underpinning the Government's connectivity ambitions would be a Digital Strategy which will set out how the Government will drive growth in the tech sector and economy, and ensure we maximise the benefits of a tech-led economic recovery.

"And to bring us full circle, at the strategy's heart will be our vision for providing world-class digital infrastructure to all, in a way that is safe, secure and built for the future".

An installation in this location will ensure that the latest high quality 2G, 3G, 4G services are enhanced for Telefonica as well as providing new 5G in and around this area of Bexley for both operators.

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

.The site is required to help fill the 2G, 3G and 4G coverage gap for Telefonica.

An installation in this location will ensure that the latest high quality 2G, 3G, 4G for Telefonica is maintained and enhanced in and around this area of Bexley. In addition, the new site will provide new 5G services.

The 3G and 4G provision allows internet access, video calling, data downstreaming, accessing social media networks and emailing to name just a few of the benefits. Therefore, to maintain high quality indoor 3G and 4G services in to this area would promote activity in line with the general population demand as the ownership of smart devices increases. 5G will deliver unparalleled speeds and capacity, with significantly reduced latency, which will be needed to deliver numerous innovative applications from autonomous cars to Internet of Things.

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A new site in this location will ensure that the security of the latest technologies will be provided into the network particularly for the data hungry applications of the latest smart hand-held devices. The operator has followed a sequential approach to site finding and identified this site as part of this process.

3G and 4G signals by their very nature (as they carry high data rates) do not penetrate over long distances, (5G even less so), just a few hundred metres, depending on the topography of the land, building clutter and vegetation including trees in the area which can reduce their effectiveness.

Fact sheets on Radio Planning and Propagation, 5G services and General Background Information have been attached to this application for reference.

Type of Structure: Monopole with open headframe	
Description:	
The proposed installation of 17.50m monopole supporting 6 no antenna on an open headframe, 2 no dishes, together with ground-based equipment cabinets and ancillary development thereto.	
It is noted that the equipment housings, have a volume of less than 2.5m, are classed as permitted development under Part 16 of the GPDO, and thus do not require prior approval.	
Overall Height:	17.50m
Height of existing building:	N/A
Equipment Housing: 2 x 42U rack	
Length:	750mm
Width:	600mm
Height:	1980mm
Equipment Housing: 1 x Eltek	
Length:	600mm
Width:	750mm
Height:	1800mm
Equipment Housing: 1 x GFMC140	
Length:	1000mm
Width:	450mm
Height:	1000mm
Materials:	
Tower/mast etc – type of material and external colour:	Galvanised
Equipment housing – external colour:	Grey & Green

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

The design of the proposed equipment is considered to be the least visually intrusive option available given the level of equipment required for 5G (see additional supporting statement – 5G Explanatory Note).

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The nature of 5G and the network services it provides, means the equipment and antennas it uses are quite different to previous, and existing, service requirements.

The design of any communications infrastructure is dictated primarily by operational requirements and secondly by the development's setting.

From an operational perspective, the operators must ensure the following when devising a final design solution for any site:

- antennas are specifically orientated to transmit effectively and efficiently without signal being impeded;
- dish links (if required) achieve a direct line of site connection with other base station sites within the network; and
- GPS modules achieve a direct satellite link.

To achieve this the operator undertakes panoramic assessment to determine what is the minimum height for transmission equipment to be located in a context of local topography and clutter, such as manmade or natural features, and in all cases the operator is committed to limiting the size and amount of apparatus to an operational minimum.

The proposed works comprise the installation of a 17.50m monopole supporting 6 no antenna on an open headframe, 2 no dishes, together with ground-based equipment cabinets and ancillary development thereto.

The design of the support pole has been carefully considered. To this end, the main monopole will be some 14.0m in height, with a slimmer supporting pole at the top of the monopole to support the proposed antennas in an antenna head frame. The top of the monopole is 17.50m. The site has been carefully located between existing trees which rise to some 5 – 7m above ground level. Whilst this affords screening for the proposed main monopole, there is a technical reason why the antennas need to be taller than the existing trees. The whole antenna need to be clear of any obstruction including trees and their branches and leaves, otherwise the trees will block the antennas from operating and prevent them from reaching the target coverage area. As such an additional installation would be required which would lead to the proliferation of masts contrary to national planning guidance. Therefore if the antennas were to be any lower then they simply would not work and would fail their design brief. There are a number of vertical structures in the immediate area which will all help assimilate the pole into its surroundings. These include the lighting columns and telegraph poles.

Exposed antennas have been designed in this location as it is the most efficient way of providing coverage to the target coverage area. The antennas could also be upgraded in the future without significant design changes, whilst maintaining quality telecommunications in this area both now and in the future. If the antennas were shrouded they would not provide such a good coverage. It is also likely that radical design changes would need to be made in the future in line with changes in technology and consumer demand.

The proposed transmission dishes are needed to provide a link in to the operators' network. They need a clear line of sight in order to operate effectively and as such need to be at a centre line height of 13.50m.

The equipment cabinets are small for telecommunications radio base stations. They are proposed to be coloured green and grey. They will have an appearance similar to other statutory undertakers' equipment cabinets such BT OpenReach which are common place in urban areas. The cabinets could

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be installed under the operators permitted development rights but have been included on the plans and in the description in order to be transparent.

The siting of the radio base station is to be positioned adjacent to a buildings where a telecommunications installation would not appear out of place. The pole is to be galvanised and cabinets are to be grey and green in order to further assimilate into the surrounding environment. The cabinets are designed to appear like other statutory undertakers equipment cabinets. They are small for telecommunications apparatus. The cabinets can be installed under the operators permitted development rights, but have been included on the plans and in the description in order to remain fully transparent.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site. Taking all matters into account it is considered that this proposal to deliver the capability for a new service for two competing operators from a single network installation, would not appear out of place within the street scene.

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Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)	Yes	No
<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, Telefonica UK Ltd 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 Telefonica UK Ltd'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>		

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:

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A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

An installation in this location will ensure that the latest high quality 2G, 3G and 4G service provision is maintained and enhanced with new 5G services for Telefonica in and around this area of Bexley.

The National Planning Policy Framework states that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt as set out below this new site is needed for Telefonica to maintain their existing 2G/3G/4G services as well as providing new 5G services to this area of Bexley.

Coverage maps are a useful tool for establishing network coverage in an area. They are developed using assumptions regarding the handset use, expected level of call reliability and signal loss within a vehicle or a building. However, plots only tell part of the story as even when the coverage plots provided show good coverage in an area there may still be a requirement to improve capacity and as such local network services. Coverage plots show coverage issues only; they cannot show capacity issues.

Coverage plots are attached to this application for information. They clearly demonstrate a need for this proposal. Notably, coverage plots cannot illustrate the capacity of the site which the surrounding sites are not designed to service.

The term 'capacity' refers to the fact that each base station can only provide services to a certain number of users at any one time. When this 'Capacity' is exceeded, although 'Coverage' remains present, the base station cannot provide service to any further users and calls/text/data usage would be unavailable. This is contrary to the purposes in which the operator's customers purchased their handheld devices as well as the Government's latest thinking that everyone should have access to the information superhighway wherever they are.

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. In addition, fact sheets on Radio Planning and Propagation have been attached to this application for reference. This information is provided to assist the local authority in understanding any technical constraints on the location of the proposed development.

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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)

In accordance with the licence obligations and advice in the National Planning Policy Framework and the Code of Best Practice in England the applicant's network rollout team investigated the following siting and design options using this sequential approach to site selection:

- **Upgrading their own existing base stations;**
- Using existing telecommunications structures belonging to another communications operator. i.e. Mast and/ or site sharing, co-location;
- Installations on existing high buildings or structures including National Grid pylons;
- Using small scale equipment; and finally
- Erecting a new ground-based mast site – (1st) Camouflaging or disguising equipment. (2nd) A conventional installation e.g. a lattice mast and compound.

Alternative site options considered and rejected are as follows:

Site	Site Name, Address, NGR, Site Type	Reason for not Choosing
Greenfield	<i>Littleworth Business Centre Vicarage Road Bexley Kent DA5 2AP (NGR: E549796 N173062</i>	Locating the new column and cabinets in the car park of Littleworth Business Centre would reduce the overall parking provision which is in constant demand throughout the day. Any reduction in overall car parking spaces would detrimentally affect the daily operations of the adjacent business park. As such, this location has been discounted.
Rooftop	<i>Littleworth Business Centre Vicarage Road Bexley Kent DA5 2AP (NGR: E549796 N173062</i>	The design of the buildings on Littleworth Business Park would not lend themselves to supporting the required telecommunications equipment. Therefore, this building has been discounted for build reasons.
Greenfield	<i>Birchwood Park Golf Club Birchwood Road Dartford Kent DA2 7HJ (NGR: E550319 N:170572</i>	<i>An installation at this location is located too far away to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason.</i>
Streetworks	<i>Vicarage Road Bexley Kent DA5 2AP</i>	<i>The pavements in this location are too narrow in which to accommodate a ground based mast. This site has therefore been discounted for this reason.</i>

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

Notably, as previously stated 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. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate'.

Moreover, upgrading existing sites in the network would not fill the gap in the network.

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

See below.

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

Relevant Planning Policy is detailed below.

Additional relevant information (planning policy and material considerations):

From the outset, it should be appreciated that irrespective of the proposed installation's use as a telecommunications base station, any change in form in the streetscene will always be, to some degree, a noticeable alteration to those residents and regular passers-by found closest. However, it should be recognised that visibility or a development's siting and appearance, does not automatically result in an overwhelming adverse harm.

In light of the above it is considered that the planning assessment of this case should concentrate on whether the proposed installation in terms of its siting and appearance are significant as to outweigh other material planning matters.

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The NPPF is pro – development with a 'presumption in favour of sustainable development' being seen as a golden thread, running through both plan making and decision taking'.

The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

It is not necessary to quote extensively from this document but the following points are highlighted.

National Planning Policy Framework (February 2019)

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

The governments National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high-quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 112 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of *reliable* communications infrastructure for both economic growth *and social well-being*.

The NPPF continues to support the expansion of electronic communications networks at paragraph 112. It notes that policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF makes reference to 5G:

'Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)...'

With the above in mind, the Government is already forward thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

Paragraph 113 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 116 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining 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.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or 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 the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 38 it states that:

'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including...permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.'

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The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 80 states:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴⁰'...

Footnote 40 of the NPPF states:

'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'.

The proposed development accords with all these aspects of the NPPF in that it will provide Vodafone and Telefonica with continued and improved network provision within this area of Croydon bringing a range of associated economic and technical benefits.

Public benefits are defined within the NPPG and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Code of Best Practice on Mobile Network Development in England (24 November 2016)

The Code of Best Practice has been fully revised in November 2016 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information super highway no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2013).

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way, which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. The Code also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

Section 2 of the Code highlights the Government's Communications Policy and Planning Policy. It acknowledges that the continued expansion and development of mobile networks is a key element of the National Infrastructure Delivery Plan 2016 – 2021. This recognises that digital communications are now a crucial component of everyday life, with improvements in connectivity being key to a vibrant economy (para 2.1).

Paragraph 2.2 goes on to state that consumers, businesses and public bodies increasingly rely on mobile communications and expect to receive a signal wherever they are. The Code indicates that

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recent changes in planning policy [and regulation] are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed.

Section 2 of this Code also reiterates NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth.

Section 3 of this Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time due to changes in technology and associated changes in demand. The Code acknowledges that there remains a reliance on radio masts to provide the main umbrella of coverage. Paragraph 3.1 explains that radio signals operate like light and must "see" over the target coverage area, they cannot be hidden and so there will always be a degree of visual impact.

Paragraph 3.2 clearly indicates that in assessing the visual impact, greater emphasis than previously should now be placed on the radio planning requirements to achieve mobile coverage (as shown in the recent changes to permitted development rights, at the end of November 2016, and the reduced test in the most recent NPPF).

Paragraph 3.3 goes on to highlight that the [operator systems tend to be demand-led or to fulfil coverage obligations. With the ever-increasing demand for data hungry applications available to a range of connected devices, such as smart phones and tablets, the requirement to upgrade and improve networks through changes to existing sites and the development of new sites is constant. As most parts of the country move on to a superfast highway, so the need to bring coverage to 'not spots' (i.e. areas where there is no mobile coverage from any operator) and improve coverage in 'partial not spots' (i.e. where there is some coverage but not from all operators) intensifies.

Paragraph 3.4 of The Code provides advice to local Planning authorities who are concerned about proposals, stating that they should not 'look for problems' but should work proactively with the Mobile Network Operators to find solutions, in line with paragraph 187 of the NPPF.

Section 4 of the Code sets out the evolution of mobile networks from 2G voice calls and text to 4G superfast mobile broadband which are now approximately the same speeds as fixed broadband connection.

Paragraph 4.1 of the Code acknowledges that customer expectations have evolved with technology. The expectation is that they will always be connected and able to access services in exactly the same way as fixed broadband for personal, educational and business purposes.

Paragraph 4.2 acknowledges that data, i.e. using the internet, puts increased demand on capacity and therefore the need for additional base stations to keep abreast of customer demand. Also, 3G base stations, originally using higher frequencies didn't travel as far and therefore each base station covered a smaller area. However, changes in working practices for the operators, in line with national guidance, streamlining networks, sharing base stations has reduced the overall amount of infrastructure required.

The Code goes on to acknowledge that operators maximise the use of their existing network infrastructure for the provision of 4G services and are similarly upgrading their 3G network infrastructure to improve capacity and coverage. However, the revised Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity needs to be enhanced in line with Government commitments and customer demand.

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Similarly, some new sites will be required to replace existing sites that are lost, for example, through redevelopment of an existing building. Some masts may need to be redeveloped or replaced to enable an upgrade in services to take place.

Section 5 relates to mobile connectivity in the 21st Century, explaining that mobile phones and other devices are now everywhere. Mobile connectivity is not just making calls and texts but also mobile broadband. The majority of mobile phones in the UK are Internet-enabled smartphones and large numbers of people also now own tablet devices. People are increasingly choosing to access the internet using a mobile device even when they have fixed broadband connection available.

The Code acknowledges that by the second decade of the 21st Century, the greatest increase in traffic across mobile networks was in data i.e. internet use (para 5.3). Paragraph 5.4 states that in terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5% in the Gross Domestic Product per capita, while another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade.

Section 5 of the Code goes on to highlight that connectivity promotes social inclusion. In recent years, more people rely on a mobile phone than they rely on a landline. Furthermore, people on lower incomes are even more likely to live in a mobile only household, or to access the Internet using a mobile connection (para 5.5).

The Code illustrates that mobile connectivity helps in the delivery of public services e.g. to access Central and Local Government via online services, acknowledging that lives are more likely to be saved when a 999 call is made from a mobile than from a landline, Telehealth is becoming increasingly important and text message reminders also improve compliance with medication and keeping NHS appointments.

Good mobile connectivity also promotes sustainability e.g. it reduces the need to travel and thus carbon emissions (para 5.7). The Code continues to support mobile telecommunications network as it is seen as a crucial piece of national infrastructure in economic, community and social terms (para 5.8).

Paragraph 5.9 states that there is a need to continually upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely. This is driven by increasing consumer demand for data, improved connectivity and more capacity, together with Government aspirations for improving connectivity and coverage.

Section 7 of the Code sets out the need for all agencies to work together to deliver connectivity that is essential to the country's economy and society including Central Government which provides the overall strategy for connectivity, mobile operators to deliver the mobile network development through the planning system and helping to identify land and structures suitable for mobile infrastructure. Local Planning authorities can also ensure that the planning function works in tandem with other relevant departments and agencies such as their own economic development departments and appropriate digital connectivity teams in order to facilitate digital connectivity.

The Code provides guidance on siting and appearance principles at Appendix A. It sets out a number of design principles in respect of telecommunications development. However, the code acknowledges that the options for design used by an operator will be affected by site conditions including requirement to link the site to the network, landscape features and coverage and capacity requirements. The main options for the operator include:

- Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator);

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- Installation on existing buildings and structures;
- Erecting new ground-based masts;
- Camouflaging or disguising equipment where appropriate;
- Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage).

The Code in Appendix A acknowledges that it has been a long-standing Government policy objective to support the sharing of masts and sites. Operators also aim to site share wherever viable. If operators are able to share sites, and install more equipment on each site, this reduces the overall visual impact of network infrastructure, because even though shared sites will tend to be slightly bigger, it means that fewer sites are needed to improve coverage and capacity, infrastructure becomes more feasible, and is more cost-effective to deploy. In fact, sharing of sites is now the norm, and network operators now share much of their network infrastructure via joint venture commercial arrangements.

However, the Code also highlights the constraints of mast sharing. Acknowledging that mast sharing may not be an appropriate environmental or technical solution in all cases. Visual intrusion may occur. The Code indicates other constraints which may include:

- Coverage problems – The existing mast may be poorly located or not have sufficient height to give the required coverage;
- Radio interference – Antennas need a separate amount of vertical and horizontal separation. This could lead to the visual impact of the mast significantly increasing;
- Structural Loading – The existing mast may not be able to hold extra equipment. The existing mast may need to be strengthened, redeveloped or replaced with a bigger structure with a consequent effect on visual amenity.

The Code continues to support sympathetic design and camouflaging including concealing antennas in familiar features such as flagpoles, street lamp posts, telegraph pole style designs and signs.

The Code also provides advice on more sensitive locations including conservation areas and listed buildings. It states that operators may be able to avoid specific locations such as listed buildings, but not an entire protected area. In such cases, they should seek to minimise the impact through sensitive design and appropriate siting of the proposals.

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that “If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

The Local Plan for the area comprises:

- The London Plan 2021
- The Bexley Unitary Development Plan (2004);
- The Bexley Core Strategy (2012)

The London Plan 2021

The London Plan 2021 is the new Spatial Development Strategy for Greater London and was adopted in March 2021 and is now part of the statutory development plan. It sets out a framework for how London will develop over the next 20-25 years and the Mayor’s vision for Good Growth. Chapter 1 of

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the London Plan deals with 'Planning London's Future - Good Growth'. Para.1.0.1 relates to 'Good Growth' that is "socially and economically inclusive and environmentally sustainable and underpins the whole of the London Plan and each policy. It is the way in which sustainable development in London is to be achieved".

Para 1.1.4 under 'Building Strong & Inclusive Communities' includes: '... social, physical and environmental infrastructure that meets London's diverse needs is essential if London is to maintain and develop strong and inclusive communities.' The corresponding policy in GG1 Building strong & inclusive communities states:

'Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:'

*'... C provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation
D seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city'*

'I support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.'

Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities.

Para. 1.3.1 states 'The mental and physical health of Londoners is, to a large extent, determined by the environment in which they live. Transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by the planning system, and local authorities are accordingly responsible for planning and public health'. During the Covid-19 pandemic there has been a much greater reliance on mobile digital connectivity to stay connected with family and friends and has become has enabled working from home and home-schooling. Without the infrastructure which enables reliable connectivity, we could not stay connected.

Policy GG5 relates to 'Growing a good economy. The supporting text states:

'.....London is the engine of the UK economy, accounting for more than a fifth of the country's economic output. Its labour market, housing market and transport links are interconnected with the Wider South East city region, which shapes the development of the whole of the UK. Together, London and the Wider South East contribute a full half of the country's output. London has unique strengths in specialist fields like finance, business services, technology, creative industries and law, as well as attracting tourists from around the world, providing a gateway to the rest of the UK. The wealth this generates is essential to keeping the whole country functioning, but the benefits of economic success are not shared evenly within London itself.'

'... Projected growth towards 6.9 million jobs by 2041 provides an opportunity to strengthen London's economy for the future, and doing so will depend on increasing diversification. The

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Central Activities Zone and Northern Isle of Dogs will remain vital to London's economic success, but growth in town centres across London will be equally important, alongside supporting local regeneration, investment in Opportunity Areas and enabling access to a wide range of jobs. Reasonably-priced, good quality employment space will be needed across London to make this happen'.

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. Convenient transport connections and street, rail and waterway networks that allow the efficient movement of goods and people are also vital, alongside the schools, healthcare facilities and other amenities that employees need to be healthy and productive.'

GG5 'Growing a good economy' states:

To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

*'... D ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth
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'
'... H recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success.'*

The New London Plan creates the strongest policies ever for Digital Connectivity.

Policy S16 (with minor suggested changes) states:

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

2) 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

3) meet expected demand for mobile connectivity generated by the development

3A) 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.

Para 9.6.1 states that **'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' (emphasis added).

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Telefónica's network is an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

The Bexley Core Strategy (2012)

The Bexley Core Strategy was adopted in January 2012, but does not contain any relevant telecommunications policies to guide such development.

The Core Strategy is the most important spatial planning document the Council has produced for over a decade. It sets out how we propose the borough develops over the next 15 years to meet the challenges of a changing environment, population and economy. It will help to shape Bexley as a place. In doing so it will help ensure our borough retains all the things we most love about it, such as its beautiful open spaces, its safe, attractive and family friendly housing areas and its bustling town centres. It will also make sure that the changes we will need to accommodate are well managed and, wherever possible, bring positive benefits

The key objective of the plan is *'to promote development that assists regeneration and renewal within the borough and enhances the quality of life of all Bexley residents, and encourage development that promotes social inclusion, addresses local social and economic needs and provides a better environment'*.

The Bexley Unitary Development Plan (2004)

The Bexley Unitary Development Plan was adopted in 2004. The policies within the adopted plan were automatically saved on commencement of the Planning and Compulsory Purchase Act 2004 for 3 years. Beyond 2007 many of the policies were saved except a few policies and proposals. The Core Strategy replaced some of the UDP policies but there are a number of saved policies which were still retained following the adoption of the Core Strategy in 2012, Policies ENV39 and ENV45 are relevant to this proposal and are saved policies. The Core Strategy itself contains no specific telecommunications policy and therefore does not provide specific guidance for telecommunications development.

Policy ENV39 Built Environment

"In order to protect and enhance the quality of the built environment, the Council will seek to ensure that all new developments, including alterations and extensions, changes of use and other operations, including highway improvements, are satisfactorily located and are of a high standard of design and layout. In determining applications for development the Council will consider the extent to which the proposal:

- *is compatible with the character of the surrounding area, would not prejudice the environment of the occupiers of adjacent property, or adversely affect the street scene by reason of its (a) scale, (b) massing, (c) height, (d) layout, (e) elevational treatment, (f) materials and/or (g) intensity of development;*
- *is appropriately landscaped, including the retention of appropriate trees and shrubs and the incorporation of public art where relevant;*
- *has any unreasonable effect on the surrounding area by reason of noise and any emissions to land, air, or water, and is not, by reason of its location, itself adversely affected by such conditions as may already be in existence within the neighbourhood;*

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- *makes adequate provision for vehicle parking in accordance with the Council's vehicle parking standards;*
- *takes due account of the need to deter crime, both against individuals and against public or private property whilst maintaining an attractive environment; and*
- *takes into consideration important local and strategic views, particularly where the proposed development is one which significantly exceeds the height of its surroundings or is located on a prominent skyline ridge”.*

Policy ENV45 Telecommunications Apparatus

“The Council recognises the need and desire for telecommunications equipment in order to facilitate the growth of telecommunications systems and will give favourable consideration to proposals, provided that they meet the criteria set out in this policy, in Government Guidance and in Statutory Regulations, as relevant. In particular, the Council will seek to ensure that satellite dishes, terrestrial microwave antennas, aerials and all other telecommunications equipment should only be located in such a way as to minimise any adverse effects on the character or visual amenity of the area.

In considering any proposals for telecommunications equipment, bearing in mind the limitations imposed by lines of sight, technical issues and legal requirements, the Council will need to be satisfied that:

- *all alternative locations or means of telecommunication have been fully explored;*
- *there is no reasonable possibility of sharing existing facilities, particularly masts;*
- *in the case of antennae and masts, there is no possibility of locating these on an existing building or other structure;*
- *the siting, design, materials, colour and appearance of the equipment should minimise the visual impact of the development on the environment, with screening and landscaping where relevant; and*
- *where a satellite dish or other equipment is to be located to serve an individual property, its location should be carefully chosen so as to minimise the impact on the appearance of the building and consideration should be given to alternative locations for the equipment at low level within the site.*

The Council will normally refuse any application or intervene on any developments by telecommunications operators which would adversely affect Conservation Areas, scheduled Ancient Monuments, statutorily listed buildings and buildings of local interest, Sites of Special Scientific Interest, registered historic parks and gardens or other areas of sensitive landscape”.

'Delivering a Step Change in Bexley's Digital Infrastructure'

Bexley adopted its digital strategy 'Delivering a Step Change in Bexley's Digital Infrastructure' in 2017. It aims to ensure that the Borough has high quality fixed line, mobile and wireless connectivity, which is a core aspect underpinning Bexley's Growth agenda. Key elements of this digital strategy include:

- Creating the right environment for the rollout of more fibre delivering ultrafast, gigabit services to premises;
- Making public Wi-Fi services more widely available across the borough and
- Putting the right foundations in place to enable mobile operators to roll out high speed 4G and 5G mobile services in a speedy and cost effective manner

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Local Policy (UDP) ENV45 refers specifically to 'Telecommunications Apparatus'. Accordingly, development proposals are determined in line with this policy as well as general design policies of the Local Plan. However, it is notable that the general policies relate to the design of the development, which should take in to account the local character, context, density and landscape. They are clearly not designed to provide guidance and support for essential infrastructure. Policy 4.11 of the London Plan is also relevant to the proposals and supports the delivery of adequate and suitable network connectivity across London.

Planning Assessment

The following paragraphs set out how the application complies with the NPPF, The Code of Best Practice, The London Plan, and the Bexley Unitary Development Plan (2004) and the Bexley Core Strategy (2012). The requirement for upgraded capacity and coverage is urgently required (as clearly evidenced in the attached coverage plots).

The proposed equipment fully complies with the objectives of the NPPF. Government guidance states that in order to limit visual intrusion the number of radio and telecommunication masts and the sites should be kept to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need of a new site has been justified.

This radio base station will enable Telefonica to improve services in the Bexleyheath area, in line with the NPPF. The Code of Best Practice also acknowledges that new sites are necessary when existing sites are no longer available. The operators' license obligations requires them to meet customers "reasonable demand". Reasonable demand would be to provide indoor coverage as customers expect to be able to use their handsets indoors. The operators also have a competitive market driven "requirement" to provide a high-quality service.

The main matter for consideration is whether the proposed siting, size and design of the telecommunications equipment would be out of keeping with the character and appearance of this recreational area, resulting in harm to the street scene. Would this harm outweigh the significant social and economic benefits associated with the replacement and increased service provision attributed to the proposal and other valid material considerations as outlined within NPPF regarding a reduction in mast proliferation through mast sharing.

The site is within the Metropolitan Green Belt.

Principle of Development

The principle of development has been established by the Government when the new permitted development rights came in to force in November 2016, which enabled sites such as this one to be built under the operators permitted development rights, (as the column height does not exceed 25m), with prior approval for siting and appearance being the only matters that the local planning authority can take in to consideration.

Planning Practice Guidance explains how a prior approval application differs from a planning application at paragraph 28. It states that:

'The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established (emphasis added). Where no specific procedure is provided in the General Permitted Development

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Order, local planning authorities have discretion on what processes they put in place. It is important that a local planning authority does not impose unnecessarily onerous requirements on developers, and does not seek to replicate the planning application system' (emphasis added).

The Planning Portal also provides Application Type Guidance. This guidance states that:

'Certain forms of telecommunication development, for example, mobile telephone masts, are known as 'permitted development' and subject to prior approval from the local planning authority. The prior approval procedure means that the principle of development is not an issue. The LPA can only consider the siting and appearance of the proposal'.

The application site is located in Metropolitan Green Belt. Part 16 of the General Permitted Development Order does not remove or restrict permitted development rights for telecommunication sites located within defined Green Belt. The Statutory Instrument establishes the principle of development in such areas and accordingly there is no requirement for the appellant to assess whether the proposed use is and 'inappropriate' use in the Green Belt or present a case setting down 'very special circumstances' to justify the development in line with the requirements of the NPPF.

Accordingly, local plan policies relating to the Green Belt should not be applied to the decision making process of this application. This is a well-established approach to prior approval applications for telecommunications development within the Green Belt as set down within numerous decided appeals such as APP/R5510/W/15/3133767 where, at paragraph 5, the Inspector states, '*as the appeal relates to a matter concerning prior approval, it is not necessary for me to consider the proposal in the context of the site's location within the Green Belt. Accordingly, I have not considered this policy matter further*'. The same conclusion is reached at paragraph 8 of APP/R5510/W/16/3156200 where the Inspector states, '*the principle of this proposal is not in question and as such the matter of circumstances permitting development in the Green Belt does not apply.*'

A recent appeal decision which reinforces the approach that should be taken in the Green Belt in respect of prior approval approvals. In the appeal (also in the London Borough of Havering, prior approval for a 25m high lattice mast was refused (APP/B5480/W/20/3251086, Land at Havering College of Further and Higher Education, Tring Gardens, Harold Hill, Romford RM3 9ES).

At Para. 8 the Inspector stated "*Although the appeal site is in the Green Belt, the Council has accepted that the proposal benefits from permitted development rights, subject only to matters of appearance and siting, and that consequently the principle of the development is not relevant. I agree with this approach. The development's visual impact on the Green Belt, due to its appearance and siting, is taken into account in the above assessment*".

Siting and Appearance:

Policy DM33 refers specifically to 'Telecommunications Apparatus'. The proposals fully comply with this policy. The operator has demonstrated in Section 5 that there no existing facilities suitable and available to provide the operators with their necessary coverage to the target coverage area. The proposed street pole has been designed to be as similar as possible to existing street furniture and therefore visual impact has been minimised.

Policy ENV39 seeks to ensure that high quality new development both integrates, respects and enhances the borough's natural environment and built heritage. Policy ENV39 notes that the Council requires development to be '*compatible with the character of the surrounding area, would not prejudice the environment of the occupiers of adjacent property, or adversely affect the street scene by reason of its (a) scale, (b) massing, (c) height, (d) layout, (e) elevational treatment, (f) materials*

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and/or (g) intensity of development'. The proposal accords with ENV39 in that the proposed installation will be a congruous feature in the street scene.

This is a well-considered design, which conforms specifically to NPPF in the determination of this planning application. However, the Council's local policies are not designed to meet the particular requirements of the local need to maintain and expand the mobile phone network. Indeed, national guidance fully supports high quality communication infrastructure.

Policy ENV39 of the Local Plan is a general design policy which is not specifically designed for telecommunications development. Telecommunications antennas are essential infrastructure to enable the mobile network to function. Similarly, street lighting columns, telegraph poles, utility cabinets, plant rooms and air conditioning units are essential infrastructure but will not necessarily create places that are locally distinctive, people friendly, provide natural surveillance, nor improve the built character and quality of an area and the way it functions. Indeed, few if any essential infrastructure in the vicinity of the site enhance the character, quality or function of the area.

The operator carefully considered the design of the proposed tower. The top height of the antenna at 17.50m is essential in order to provide the operator with the multiple technologies in this location including new 5G services. There are a number of mature trees surrounding the site and the wider area.

Exposed antennas have been designed in this location, as the site is located on private land some distance from the nearest residential property and set well back from the nearest made adopted highway. Antennas in an open head frame are the most efficient way of providing coverage to the target coverage area. The antennas could also be upgraded in the future without significant design changes, whilst maintaining quality telecommunications in this area both now and in the future. If the antennas were shrouded they would not provide such a good coverage given the shroud would constrain the ability to tilt and orientate the antennas. It is also likely that radical design changes would need to be made in the future in line with changes in technology and consumer demand.

The radio base station has been carefully located adjacent to a fence and in close proximity to mature trees and shrubbery. This natural vegetation, together with the orientation away from residential properties and highways and distances between these will ensure that the majority of the monopole and ground level equipment cabinets will be screened from the surrounding area. This will ensure that the proposal will not appear prominent in the landscape especially as the proposed monopole will be viewed in the context of low level agricultural and light industrial buildings. This means that together with the galvanised colour suggestion then the tower will not appear stark in the landscape and the visual amenity of the area will not be detrimentally affected.

Shrouding the antennas would lead to unwarranted inefficiencies considering the nearest residential property is some distance away. As such, it is not considered reasonable to reduce the ability of this site to maximise the opportunity of providing the necessary coverage to the target coverage area. This is especially true given the significant social and economic benefits of providing the latest high quality 2G, 3G, 4G as well as new 5G mobile service provision to this part of Bexley and the surrounding area.

The design of the column resembles as closely as possible the other existing vertical structures within the immediate area. These vertical structures will help the proposed radio base station assimilate with the surrounding area. The site will also be near to a number of mature trees and bushes which will partially shield the column from the wider area.

It is accepted that the height of the proposed installation is taller than other pieces of surrounding linear structures but this in itself is not a valid reason to conclude that it is not appropriate at a specific

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location. Indeed, Inspectors at appeal have noted that by their very nature to be effective masts are required to be taller than surrounding structures.

Telecommunications apparatus by their very nature must be taller than surrounding built and natural form to ensure its efficient operation. The Code of Best Practice explains this requirement fully in paragraph 3.1, *'radio signals operate like light and must "see" over the target coverage area...'*

The proposed height at 17.50m is essential in order to clear the mature trees in the area and provide upgraded 3G/4G services as well as new 5G services to this area of Bexley.

The equipment cabinets at ground level are designed to resemble, as closely as possible, other utility operators equipment. This ensures that the cabinets will not appear out of character in the street scene. The equipment cabinets are ancillary to the functionality of the antennas. They are proposed to be coloured green on the edge of the compound and grey within. Notably, the colour of the equipment is not fixed and can be painted to reflect LPA requirements. Notably, the cabinets are permitted development and are not subject to the prior approval process.

The NPPF strongly supports sustainable development. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore comply with NPPF to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

The Code of Best Practice also acknowledges that the visual impact of the mast can be greatly reduced if it is placed near similar structures such as road signs, lamp posts and commercial premises. The equipment is sited close to the existing commercial buildings and street furniture. Therefore, the installation should merge into the existing street scene and not be viewed as a protruding feature within its setting. As a result, the proposed design fully accords with the NPPF, The Code of Best Practice and the Local Plan Policy ENV45 (UDP).

5G Coverage – Material Consideration

Mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work.

Without this new radio base station 5G will not be rolled out in the area. If the 5G network is not available then the customers' would not be able to utilise these handheld devices for the purposes in which they were purchased.

At present, during the COVID 19 pandemic it is paramount that digital connectivity is supported and maintained throughout the country. In particular the current massive shift in user demand from city centres and places of work to residential areas and suburbs requires an improvement in coverage and capacity throughout the whole network. The current proposal therefore provides such additional capacity to the network whilst still promoting the improved 4G technology and new 5G technology.

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The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.

The Code of Best Practice acknowledges that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which we rely. With increasing consumer demand and the Government's aspirations for high quality communications infrastructure it is ever more important to improve connectivity and capacity.

Economic and Social Benefits

When telecommunications proposals are considered, it is necessary to carry out the balancing exercise weighing the need for development and the magnitude of public benefits of the proposed base station against the perceived concerns about the development's visual impact and availability of alternative locations and the possibility to design the scheme differently without impacting the operational needs of the operators.

As has already been presented, there is a clear and demonstrable need for a new radio base station in the area.

The NPPF strongly supports sustainable development as does the Council's Local Plan and 'Delivering a Step Change in Bexley's Digital Infrastructure'. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with the NPPF and the Council's Development Plan to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

There have been numerous appeal decisions where the Inspector has attached significant weight to the benefits, alternative options, technical constraints and NPPF in a balancing exercise of all the valid material considerations, including visual impacts and the impact on residential amenity.

It is therefore clear that the Government places significant importance on reliable communications and as such the Planning Inspectorate gives significant weight to the public benefit arising from local service provision. The issue of benefits and planning balance is considered in Appeal Ref: APP/L1765/W/18/3197522 Land at junction of Andover Road and Athelsan Road, Winchester. The proposal related to the installation of a 17.5m street works pole and associated equipment cabinet at land at the junction of Andover Road and Athelstan Road, Winchester.

The Inspector found at Paragraph 9 *'The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "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". In this instance, the proposal is not so much seeking to provide significantly higher standards but to maintain recent local provision of 2G, 3G and 4G services as a result of a notice to quit from a nearby site that was providing these services. The Council has*

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commented that service provision would be 'adequate' without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision'.

The issue of benefits and planning balance was also considered in Appeal Ref: APP/X5990/W/16/3162918, 55 – 59 Oxford Street, London, W1D 2EQ. The Inspector found at Paragraph 20:

'Whilst I have paid special attention to the desirability of preserving or enhancing the character and appearance of the conservation area, the above factors lead me to conclude that there is less than substantial harm to the character and appearance of the existing building and the Soho Conservation Area'.

The proposal related to the installation of 9 no antenna inside a 'replica' GRP extension to the plant room. Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

There is a demand for mobile connectivity in areas where geography, logistics or economics – or a combination of all 3, make it difficult. Mobile network capacity needs to grow to meet the demand of mobile users, who are consuming ever increasing amounts of data.

Paragraph 38 of the revised NPPF states that:

'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including...permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.

Maintaining high quality 2G, 3G and 4G coverage and capacity as well as providing new 5G technology in this area fully me this part of the NPPF. The social and economic benefits are a significant material consideration which should be weighed against the visual impact associated with a radio base station in this location. HM Treasury outlined such benefits in its report *'Fixing the Foundations: Creating a More Prosperous Nation'* – July 2015. Paragraph 7.1 of the plan stated that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

Paragraph 7.2 goes on to highlight strong support for high quality communications infrastructure. It states

'by reducing red tape and barriers to investment, the Government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The Government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published March, of near universal 4G and ultrafast broadband coverage.'

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Indeed, MPs have noted in parliament that the UK's Superfast Broadband connectivity was 'relatively poor'. As such, there is continuing and growing strong national support for high quality communications infrastructure. Further to the Government's commitment to improve connectivity, on 24th November 2016 the new permitted development rights for telecommunication operators came in to force, designed to lift the restrictions on mobile operators such as the significance and weight the Government place upon the benefits attached to modern connectivity.

In October 2016, there was also the BIG Infrastructure Group (as Chaired by MP Grant Shapps) Report release calling on operators to improve their network. This is signed and has comments from numerous MP's nationally.

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016 ([https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-\(1\).pdf.aspx](https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-(1).pdf.aspx)). It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

'A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global market place. Securing digital connectivity is thus critical to the UK's long term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases'.

The Assessment goes on to note that *'Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy'*. Therefore, this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of providing new 5G services to this very busy area of the capital, where the social and economic benefits outweighed the environmental considerations.

Ministers from the DCMS and MHCLG wrote to all CEOs of Council's in England (March 2019) setting out its position in respect of supporting investment in high-quality, reliable digital connectivity. The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion. Ministers state:

'It is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. As outlined in the Future Telecoms Infrastructure Review, the Government would like to see nationwide full fibre coverage by 2033. We would also like the UK to be a world leader in 5G, with the majority of the population covered by a 5G signal by 2027. We are writing to ask for your help in supporting the investment necessary to achieve these objectives.

Recent years have seen substantial investment in mobile and fixed digital infrastructure across the UK.

While mobile coverage across the UK has been significantly improving, there are still too many areas where coverage is poor. The UK has now achieved 95% superfast broadband coverage but still only 6% full fibre coverage.

We need to create the market and policy conditions necessary to support the large-scale commercial investment required to extend and future-proof digital connectivity. A key part of this is making it easier for operators to deploy infrastructure. To help to achieve this, the Government recently reformed the Electronic Communications Code - the statutory framework which underpins agreements between

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communications network providers and those in both the private and public sector who can provide sites for the installation of network equipment. The purpose of the reforms was to make it easier and more cost effective for communications network providers to deploy and maintain digital infrastructure.

Local authorities have an essential role to play as site providers. As Chief Executives, you can support investment in digital communications infrastructure by ensuring your organisations have policies and procedures in place that promote effective engagement with the digital communications industry and minimise barriers to deployment'.

The radio base station installation in this location will allow both Telefonica and Vodafone to provide 5G mobile communications supporting the Government's aim of 'focusing on ensuring that everyone is connected to the information superhighway'. This fully meets the aspirations of the NPPF and the Council's Development Plan in general terms, its vision to provide a high quality of life for all, helping businesses to thrive, the economy to grow, investing in infrastructure benefitting new and existing residents, connecting people to services, facilities, economic opportunities to meet everyday needs and promoting sustainable development.

At present, during the COVID 19 pandemic it is paramount that digital connectivity is supported and maintained throughout the country. In particular the current massive shift in user demand from city centres and places of work to residential areas and suburbs requires an improvement in coverage and capacity throughout the whole network. The current proposal therefore provides such additional capacity to the network whilst still promoting 5G technology.

In respect of 'Connectivity and COVID 19, the Major of London has provided guidance on 'London's access to mobile and broadband networks', stating:

We know that with lots of Londoners now having to stay at home, people have lots of questions about whether mobile and broadband networks will be able to cope as more of us are now working from home.

Both mobile and fixed networks are built to support peak times. The types of application that people use heavily at peak times, during evenings at home, such as Netflix, Amazon Prime, Sky Go and other streaming or gaming services, use much more bandwidth than typical working tools like emails, voice and video calling.

There is enough capacity in the system to cope with many more people working from home, even with the significant increases in home working we are seeing due to coronavirus (COVID-19) impacts.

If many engineers are ill or required to isolate, broadband providers may have to prioritise repairing faults over new connections. However, operators have been considering this for some time and have been developing plans for coping with such a situation'.

The Major for London, listed various guidance including:

Below we have provided a list of guidance from various operators:

Operator guidance

On 10 April, through a joint statement with Government, the UK's major internet and mobile companies have agreed to work with NHS England and NHS Improvement, and NHSX to:

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- Offer identified NHS frontline staff, who are existing customers, the mobile data access, voice calls and text they need, at no extra cost, on their personal mobiles used for work purposes, to enable the staff to work remotely without fear of extra charges and limitations;
- Ensure NHS clinicians working from home have, wherever possible, prioritised broadband upgrades to superfast or other improvements they might need, in order to perform tasks, such as consultations carried out via video conferencing and to download/upload large medical files. Clinicians with slow or standard broadband speeds, for example, would be eligible to be upgraded to superfast speeds where their current connections are insufficient. Some providers will upgrade customers who are NHS workers on to faster speeds without any extra charges.
- Improve connectivity in care homes that have slow, or no, broadband connections, wherever possible; and
- While patients having remote consultations will get the best experience on a fixed broadband connection, there are a small proportion of mobile-only households. Operators have already agreed generous data allowances for their vulnerable mobile customers, so that patients that can only use a mobile connection for their video consultations will have sufficient data available.

Online Nation is an annual research report, published for the first time in 2019. Using research produced both by Ofcom and others, it looks at what people in the UK are doing online, how they are served by online content providers and platforms, and their experiences of using the internet, alongside business models and industry trends. As well as looking at long-term trends, this year's report includes more recent data looking at online behaviour in the UK during the coronavirus (Covid-19) pandemic.

The Report sets out its findings:

With respect to the consumer and industry it found that time spent online, and associated revenues grew in 2019.

- In September 2019 the average time spent online each day by adults aged 18+ was 3 hours 29 minutes. In comparison, on average, adults spent 3 hours 19 minutes watching TV on a TV set each day,² and 2 hours 40 minutes listening to radio each day.
- 71% of all measured time spent online was on smartphones. 35% of internet users only accessed the internet on mobile devices (smartphone or tablet).
- Just 13% of adults do not use the internet
- In 2020, a fifth (22%) of UK adults have a smart speaker in the home and 11% of all UK households own some kind of 'smart home' technology (including devices such as smart home security, smart lighting and smart heating).

Key Metrics Online Consumer Market

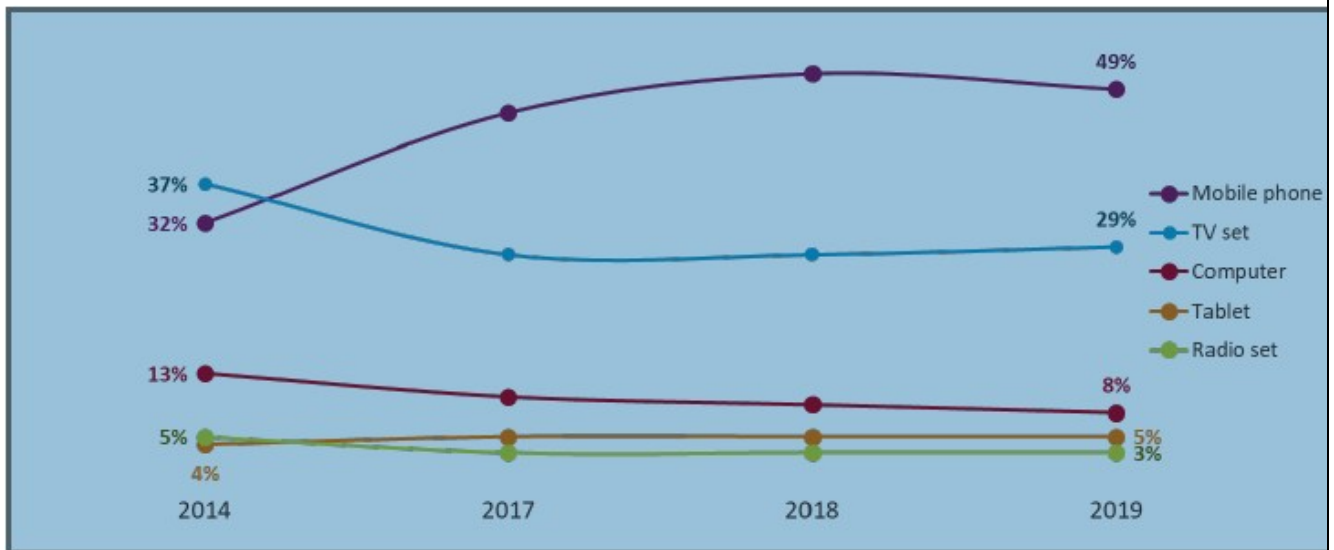
UK online consumer market	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Internet take-up (%)	76	79	80	82	85	86	88	87	87	89
Smartphone take-up (%)	27	39	51	61	66	71	76	78	79	82
Tablet take-up (%)	2	11	24	44	54	59	58	58	54	52
Laptop take-up (%)	55	61	62	63	65	64	64	63	60	57
Consideration that the smartphone is the most important device for internet access (%)	n/a	n/a	n/a	32	32	38	46	48	52	60

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As the table above highlights 60% of the consumer market consider Smartphones are now the most important device for internet access.

In September 2019, 81% of all measured time spent online was on a mobile device (both tablet and Smartphone).

The table below indicates the most-missed device among adults: 2014-2019 were it be taken away from them. As can be seen, nearly half of all adults say that their mobile device is the device they would miss most were it taken away from them.



Source: Ofcom Adults' Media Literacy Tracker 2014-2019

The Report found that social media and messaging sites reach 98% of the UK adult digital population. On average, visitors aged 18+ spent 49 minutes per person per day on social media sites, considerably more time on average than in key areas such as news sites (12 minutes per user), e-commerce sites (14 minutes) and even gaming sites (31 minutes).

Ninety-two per cent of time spent on social media sites took place on a mobile device (smartphones and tablets) rather than on a computer, compared to 81% of total time spent online.

The Ofcom Connected Nations 2019 Report (published December 2019 and reissued in March 2020) measures progress in broadband and mobile services in the UK and highlights the work Ofcom is doing, alongside UK and devolved governments and communications companies, to improve the availability of these services. Ofcom has aspirations for people in the UK to be able to easily access good broadband and mobile connections wherever they live, work and travel.

The report notes that over the last few years, the availability and take up of superfast and ultrafast broadband and the coverage and take-up of 4G mobile services have dramatically increased. The UK holds a leading position on current 4G mobile network coverage compared with other large European countries. It highlights that this demonstrates that policy and regulatory decisions made in the past few years have supported investment in new networks and technology and delivered a good outcome for consumers.

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The Report goes on to state in the Overview that '*emphasis must now turn to the initiatives needed to ensure that the next wave of network deployment can meet future needs as quickly as possible by further extending the reach of full fibre and mobile networks*' (emphasis added).

The Connected Nations Report 2019 found that 5G services have been launched by all four mobile network operators over the past year and are now operating in over 40 towns and cities across the UK. Initial offerings are focused on densely populated areas. As well as providing improved broadband services for consumers via public networks, future 5G networks could provide specialist services to organisations and businesses.

The report highlights that the UK is a 5G leader in Europe, because it is one of the first countries where all of the Mobile Network Operators have started 5G deployment. These initial 5G networks target mobile broadband services, providing several enhancements over 4G networks, including higher speeds and the capability to deliver extra capacity where needed, such as in urban areas or sports stadiums. It goes on to state that future evolutions of these initial 5G networks will enable additional services that rely on a near instantaneous network response and need high reliability, with applications in sectors such as manufacturing, logistics, agriculture, transport/automotive, energy, media and entertainment and healthcare. Examples include controlling vehicles at distance e.g. in mines, or enabling robots in automated factories to communicate with each other.

The Report acknowledges that 5G roll out has so far focused on areas with higher populations, where capacity demands are likely to be greatest. In the near term, operators are likely to continue rollout in areas where 5G will deliver significant quality of service improvements needed to meet consumer demand.

The Report highlights the benefits of 5G for organisations and businesses noting that Public mobile networks, in addition to providing broadband services for consumers, could also be used to provide specialist services to organisations and businesses. Organisations and businesses could also decide to access 5G services via a local private 5G network, either self-deployed or deployed by a third party.

The Report also notes that 4G carries 90% of data traffic, but only 21% of voice traffic, with 3G and 2G carrying 73% and 6% of voice traffic respectively. The vast majority of traffic (82%) is generated in urban areas, and data growth in these urban areas is continuing rapidly, up 35% on 2018.

The Connected Nations 2020² (December 2020) report is published as the UK continues to address the challenges of the coronavirus (Covid-19) pandemic; a time when people, families and businesses have come to rely on their phone and broadband connections as never before. We report on how the networks have performed during this period and how the availability of services has evolved.

The report sets out in its findings:

- **The UK's fixed and mobile networks have generally coped well with increased demands during the pandemic.** A shift to more people being at home drove increased demand on broadband networks during the day, although peak usage remained in the evening. Mobile networks also experienced increases in voice traffic.
- **The number of mobile base stations providing 5G services has risen ten-fold, to around 3,000 across the UK.** 87% of these are in England, 7% in Scotland and 3% in both Wales and Northern Ireland.

² <https://www.ofcom.org.uk/research-and-data/multi-sector-research/infrastructure-research/connected-nations-2020/main-report>

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- **Mobile coverage is generally stable.** The four mobile network operators (MNOs) – EE, O2, Three and Vodafone - each estimate they provide outdoor coverage to 98%-99% of premises. Their networks' coverage of the UK landmass ranges from around 79% to around 85%. The Shared Rural Network programme agreed in March 2020 will extend coverage beyond this by 2025.
- **A small, but significant number of properties are still struggling to get connected.** We estimate that 43,000 premises cannot access either a decent fixed broadband service, or good 4G coverage, indoors.
- **Mobile data consumption continues to rise, increasing by 42% compared with last year.** 83% of the total data traffic was consumed in England with about 10% in Scotland, 4% in Wales and 3% in Northern Ireland (largely in line with UK population distribution). Reflecting this growth, the traffic carried in England in June exceeded that carried across the whole UK in February.

The report acknowledges that being connected has never been more important in the UK. *“People have been relying on phone and broadband services more and more over recent years, and the Covid-19 pandemic during 2020 has brought this reliance into even sharper view. In March 2020, life changed suddenly for millions of people across the UK. Fast, reliable broadband and mobile connections were essential to allow them to work from home, keep up with schoolwork, access medical appointments and public services, stay in touch with friends and family, order shopping online, and keep themselves entertained”.*

The report acknowledges that “during the first COVID 19 lockdown, UK MNOs coped successfully with the changes in data and voice traffic volumes and distribution as many people began working from home and schools were shut during the Covid-19 spring lockdown. New peaks were reached for most of the network metrics reported by MNOs just before or during the week lockdown measures were first introduced across the UK in March 2020. Although these peaks generally reduced with the gradual easing of lockdown, they have remained higher than they were before (in line with the historical trend for incremental growth in data consumption)”.

The report further notes that the *“MNOs all experienced some form of congestion on their networks in this period, but successfully mitigated this, in part by increasing interconnect capabilities between themselves. Some operators applied further temporary upgrades to their voice and data capabilities in order to cope with increased demands during this period, for example deploying temporary base stations in and around hospitals (particularly at the Nightingale hospitals) to provide additional capacity”.*

“Compared to periods before the spring lockdown, mobile voice traffic increased by 10-45% across the operators. One operator observed an increase in average call duration from about 2.5 minutes (pre-lockdown) to 4 minutes in the week lockdown measures were introduced. These call lengths and volumes spiked in March, before gradually stabilising. Within this general trend for growth, we can also observe drops in average call duration and data traffic around 8pm for the 10-week period from 26 March 2020, coinciding with the nation coming together to applaud the efforts of the NHS during the Covid-19 crisis. Increased amounts of voice traffic were also offloaded to Wi-Fi, although with significant variations between operators”.

On the 1 October 2020, as part of the Speed up Britain Campaign, The Centre of Policy Studies Report published ‘Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution’³. The report identifies what the 5G opportunities are and what the Government needs to do so we can all benefit from this vital new technology. It states that delays to the rollout of 5G could cost the country tens of

³ <https://www.cps.org.uk/research/upwardly-mobile>

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billions of pounds in lost economic output. The former Government advisers Alex Jackman and Nick King argue that Government's 'levelling up' agenda and the UK's recovery from the COVID-19 pandemic is at risk without a faster 5G rollout – to the tune of £41 billion.

The report highlights that if delays continue at their current rate, by 2027, over 11 million households and businesses could be missing out on vital digital connectivity. Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities.

The report states that *'the UK must have a functioning network to now support the recovery from the pandemic, empowering businesses and communities with wider coverage, and preparing the ground for the services that 5G can provide'*.

Using analysis by the independent consultancy Policy Points, the report estimates that if 5G coverage reaches a quarter more of the population than the Government's current target of 51%, it will produce GDP gains of £41.7 billion by 2027. It highlights that the difference between the UK being a leader and a laggard in 5G adoption could be as much as £173 billion in incremental GDP over the coming decade, as estimated by the Future Communications Challenge Group.

The manufacturing, construction and agricultural sectors have been hit particularly hard by the pandemic, and these would benefit significantly from improved connectivity. However, onerous planning rules and loopholes in existing legislation are slowing down the infrastructure upgrades needed to make the most of this mobile revolution in these much-needed industries.

Digital networks and services have underpinned our resilience to the COVID-19 pandemic and they will drive our recovery. By expanding them, we deliver not only immediate benefits but also the essential foundation stone for future prosperity.

The report highlights that while 5G promises to create economic benefits through increased capacity, reliability and speed – vastly improving business productivity and removing barriers imposed by poor digital connectivity – the system is plagued by red tape.

The report acknowledges that the gains are not just at national level. A more extensive digital infrastructure helps local areas to attract and retain businesses and talent, thereby playing a vital role in reducing regional inequalities. Providing a supportive environment for digital infrastructure is one of the few things the Government can do that costs little, boosts growth and helps level up the UK....the key is speed. **The faster a network is built, the bigger the regional gains** (emphasis added). The telecommunications industry faces challenges on this front. The COVID-19 pandemic has increased demand on networks but delayed the availability of new spectrum to provide additional capacity.

The report notes that the reliability and reach of 4G is more important than ever. It is needed both to quench immediate demand, and also to facilitate future 5G rollout, as the underlying passive infrastructure will initially support both technologies. Every failure to provide better coverage not only presents an immediate opportunity loss for local business and consumers but also has a bigger downstream economic impact. It acknowledges that productivity gains to business, equality gains for regions and economic gains for the country are only as achievable as the networks they can access.

The report recommended that the Government should reform the strategic planning framework to compel local authorities to ensure that the needs of future mobile connectivity are adequately addressed in Local Plans and that new developments are assessed on how they might impact, or could support, local connectivity.

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Practical Applications of 5G Connectivity as Example of Material Socio-Economic Benefit:-

Education

The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

Health:

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

It is therefore considered that the wider public benefits ensuing from the installation of equipment will outweigh the very limited harm to the street scene.

Health and Safety

The proposed installation conforms to current government planning guidelines regarding potential health effects arising from telecommunications development. The operator has attached a declaration that the site conforms to ICNIRP guidance. This is in full accordance with NPPF.

Recent court cases have confirmed that the *public perception* of health risks can be a material consideration within the land-use planning system. The weight to be attached to this issue has to be determined accordingly in each case by the decision maker. It has been generally held, and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been demonstrated that the proposed installation will comply with the ICNIRP guidelines.

The publication of the National Planning Policy Framework continues to highlight the Governments view that the planning system is not the appropriate mechanism for determining health safeguards. It sends a clear message to local planning authorities stating that they must 'determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure'. This is reiterated in the Code of Best Practice.

In this instance, Telefonica believe that it is not necessary to consider health effects further, as recommended by NPPF. The operator is committed to ensuring that all new and existing installations are ICNIRP compliant, and consequently it is considered that there is no basis for this application to be

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refused on health and safety grounds or for reasons relating to public concerns about health and safety. ICNIRP compliance certificates are enclosed for the operator with this application. If required, additional information regarding the operation of mobile telephone base stations and health and safety considerations can be provided.

Summary

The following conclusions have been reached:

The proposed installation will enable the operator to provide upgraded 3G/4G as well as new 5G services around this area of Bexley.

Installing a radio base station in this location, providing upgraded 3G and 4G coverage will fully meet the national Governments aim of '*ensuring that everyone is connected to the information superhighway*' and the national policies set out in NPPF.

The applicant considers the proposed installation in terms of its siting and appearance would not cause significant harm on the street scene or Metropolitan Green Belt and any harm caused would be outweighed by the need for the proposal when balanced against the development plan and other material considerations.

Confirmation that submitted drawings have been checked for accuracy

Contact Details

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Signed:  Date: 19.07.2021

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