



Harlequin Group

Rutland House

5 Allen Road

Livingston

EH54 6TQ

t: 01506 721014

e: k.parker@harlequin-group.com

w: www.harlequin-group.com

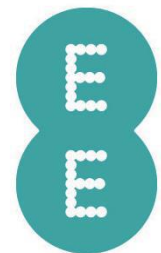


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Rev	Originator	Date
0	Name	Day/Month/Year
1	Kieran Parker	17/08/2021
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Introduction

This Planning Supporting Statement has been prepared by the Harlequin Group Limited on behalf of EE Limited. The statement has been prepared in support of the application to install a 30-metre-high telecommunications greenfield column and associated supporting apparatus at land southwest of Tittenhurst Park, London Road, Ascot, SL5 0PP.

In accordance with the Code of Best Practice on Mobile Network Development and published Government guidance, this proposal was drawn up having regard to the need for good design. This statement sets out the most relevant considerations in respect of the proposed development. This provides context for the proposal, reasoning, technical justification and planning constraints, policy guidance and alternatives.

In particular:

- Considerations of design and layout are informed by the context, having regard not just to any immediate neighbouring buildings but the townscape and landscape of the wider locality. The local pattern of streets and spaces, building traditions, materials and ecology all help to determine the character and identity of the development.
- The scale, massing and height of proposed development have been considered in relation to that of adjoining buildings; the topography, the general pattern of heights in the area; and views, vistas, and landmarks.

The following general design principles have been taken into account in respect of this proposed telecommunications development:

- A proper assessment of the character of the area concerned;
- That the design shows an appreciation of context;

1.0 Proposed Development

1.1 The Site

The proposed site is located to the southwest of Tittenhurst Park. Tittenhurst Park is a Grade II listed early Georgian country house in an estate of 72 acres off London Road at Beggar's Bush near Ascot and over the parish border into Sunningdale. The current site location is within the park area approximately 180 metres to the southwest of the main residence. The site is located within a small triangle shaped grass area which accommodates an existing O2/CTIL telecoms mast. The area where the proposed site is to be situated is currently amenity land with no alternative use.

The presence of the existing mature trees in the greater surrounding area which measure at a height of 10-30 metres will act as a backdrop or excellent level of screening (depending on direction of view) for the proposed equipment and provide a natural vertical context for the proposed development for long range views (as demonstrated within the enclosed Photo Montage Report).

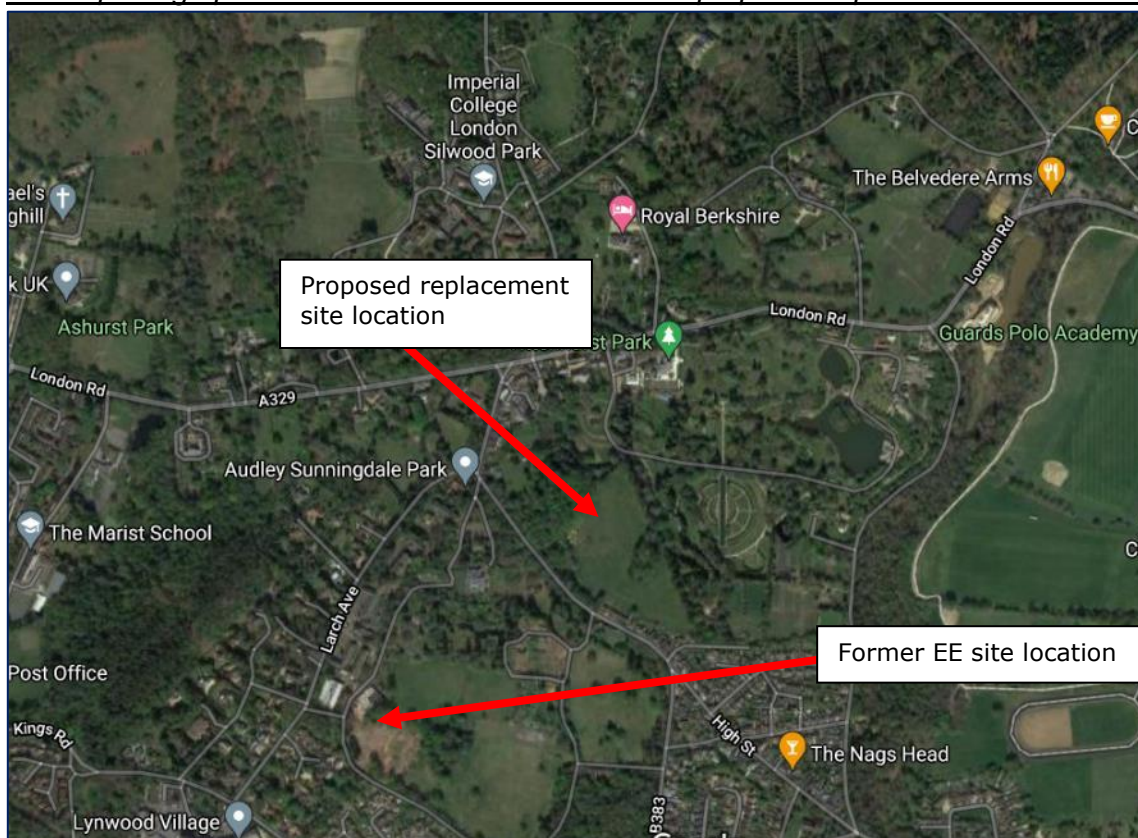
The proposed structure will be located on land adjacent to an existing telecoms infrastructure within the park. The presence of this existing telecoms mast provides a utilitarian context in which the proposed greenfield column will assimilate, thereby not resulting in a prominent, or incongruous feature which would detract from the existing character of the area.

The proposed structure will be galvanised so that the contrast between the proposed mast, the existing O2/CTIL mast and the skyline is reduced. The ground-based equipment cabinets are to be fir green to minimise the contrast between the proposed equipment cabinets and the existing adjacent trees/vegetation, thereby minimising the visual impact on the area. Please advise if a different colour for either the mast or the cabinets would be preferable at the early stages of this proposal.

The application site has been specifically selected to assimilate into the existing character of the area and utilise the natural environment to mitigate any perceived visual impacts. The replacement site must be in the same geographical area to ensure that the lost network coverage is replaced effectively. Additionally, the application site lies out with any Conservation Areas or overly sensitive designations. The site is located within a Greenbelt but this covers the entire search area.

The installation proposed is that of a standard telecommunications' greenfield column. This specific design is often utilised in rural/wooded areas to meet the visual requirements of the local area. The height of the proposed structure, and the overall design of the tower, has been kept to a minimum to ensure that any visual impact is reduced where practicable, whilst ensuring network coverage is reinstated and improved to the local area.

Aerial photograph of former EE site location and the proposed replacement site location



1.2 Application History

The requirement for a new mobile phone base station at the selected location is to replace the former decommissioned and removed rooftop network cell (BRK0137) for this area at former Old Civil Service College, Larch Avenue, Sunningdale Park, Ascot, SL5 0AS.

The decommissioning of the former existing installation is further to the building being demolished to make way for new residential development. Therefore, a replacement site is required urgently for this area, which the proposed development will address, ensuring the network coverage for this area is significantly improved.

The Local Planning Authority was approached in 2017 for a streetworks proposal at land north of Morton Lodge, London Road, which subsequently was refused permission due to siting and appearance on the character/area and effect on trees (Reference: 17/01560). This decision was later appealed (Reference: APP/T0355/W/17/3186243) and this appeal was dismissed by the Planning Inspectorate.

Following the appeal refusal, two sites were progressed in the area as they were both required to make up for lost coverage due to difficult topography and height of surrounding trees. The first site was a 25m FLI tree mast and associated supporting apparatus at land northwest of Sunningdale Park, Larch Avenue, Ascot, SL5 0QE (Reference: 20/90218/PREAPP) which received negative comments from the Local Planning Authority and would not be supported. The second site was a 25m lattice tower and associated supporting apparatus at land east of 20 Crossways, Silwood Road, Ascot, SL5 0PL (Reference: 20/90223/PREAPP) which also received negative comments from the Local Planning Authority and would not be supported.

The proposed new mast will not only service voice calls but will include provision for 3G/4G and newly developed 5G data use which will be of great benefit to all users of the network. As you may be aware, EE have been awarded the contract to provide network services to the Emergency Services, which will operate over EE's 3G/4G/5G network and as such, this site will also provide coverage for all the blue light services in this area.

1.3 The Proposal

The proposed development comprises of the installation of:

- 1 x 30-metre-high ground based Type A greenfield column fixed on concrete base
- 6 x multi-band sector antenna fixed onto tower headframe
- 2 x 0.6m DIA transmission dishes fixed onto tower headframe
- 1 x GPS Node fixed to gantry pole
- 1 x MK5B Link AC cabinet (1200x500x1600)
- 1 x Airo AC cabinet (1540x1540x2000)
- 1 x APM5930 & RFU cabinet (1200x480x900)
- 1.1m high post and rail fence around 7m x 7m compound
- Other ancillary equipment and cabling

The mast is to be galvanised and the cabinets are to be fir green (RAL 6009).

The proposal is standard in nature and designed specifically for rural/wooded environments to help it assimilate with the area.

1.4 Alternative Site Assessment

The table below contains details of the alternative sites that were investigated when searching for a viable location. These locations were assessed to ascertain whether they would provide the technical and operational requirements necessary for the surrounding area. As this installation is required to replace an existing telecommunications installation, the search area is particularly restricted by geographical and distance factors, with close proximity to the previous site of major importance. Should this not happen, then it is likely to lead to a network coverage hole in this area. The options below were considered and discounted due to a multitude of factors.

1. Land around decommissioned EE site (BRK0137) - 494539, 167841 (Various NGR's)

There is not suitable location on this land following the residential development proposal.

2. Imperial College grounds - 494809, 168494 (Various NGR's)

The Network Planner confirmed this site would not provide the required coverage to the target area.

3. Sunningdale Park - Approx. NGR: 494787, 167996

Due to the sensitive planning designation, it is unlikely any proposal so central within the Gardens and designed landscapes would be accepted by the Local Planning Authority.

4. Car Park at rear of Pazzia Sunninghill - Approx. NGR: 494863, 168315

Given the height of mast required (30m), this would not be possible at this location due to space requirements.

5. London Road SW - Approx. NGR: 494764, 168368

Given the height of mast required (30m), this would not be possible at this location due to space requirements.

6. Land at Royal Berkshire - Approx. NGR: 494885, 168442

This site does not have any means of access to it and therefore cannot be progressed.

7. Highways A329 London Road - Approx. NGR: 494848, 168404

This site would not be supported by the Council or the Planning Inspectorate and therefore could not be progressed.

8. Larch Avenue SW - Approx. NGR: 494728, 168185

Given the height of mast required (30m), this would not be possible at this location due to space requirements.

9. Sunningdale Bowling Club – Approx. NGR: 495284, 167884

The Network Planner confirmed this site would not provide the required coverage to the target area.

10. Holy Trinity Sunningdale Church – Approx. NGR: 495368, 167544

The Network Planner confirmed this site would not provide the required coverage to the target area.

11. Allotments South of Church Road – Approx. NGR: 495241, 167382

The Network Planner confirmed this site would not provide the required coverage to the target area.

12. Land Opp DPS - Approx. NGR: 494857, 168298

The Local Planning Authority confirmed they would not support this site due to visual impact on the area.

13. Sunningdale Park GF - Approx. NGR: 495078, 167648

The Local Planning Authority confirmed they would not support this site due to visual impact on the area.

14. Land at Sunningdale Park - Approx. NGR: 495083, 167812

The Network Planner confirmed this site would not provide the required coverage to the target area.

15. Tittenhurst Park O2 SS – Approx. NGR: 494962, 168182

Given the height/bulk of the existing O2/CTIL telecoms infrastructure, a much larger and wider lattice-style structure would be required to accommodate both O2/CTIL's existing equipment and, EE's required height and equipment. Therefore, it was considered that the visual impact

1.5 Additional Justification

Emergency Services Network Requirement (ESN):

In 2015, EE won the contract from UK Government to deliver a mobile network specifically for all blue-light emergency services across the country to provide a seamless 4G mobile service. The communications system will be critical in improving response times and improving communications between all of the blue-light services and providing critical infrastructure across the length and width of the United Kingdom. EE have committed to add over 500 new 4G sites to accommodate this commitment in that will eventually replace the existing Airwave TETRA radio system.

This EE proposal will form part of the new 4G emergency services network and should be considered critical infrastructure within the UK to support the local community in perpetuity.

Shared Access – The Benefits of Mobile Technology

Mobile phones and other similar communication devices are ubiquitous both for business and personal use. Mobile connectivity is now about fast, secure access to the internet anywhere. People and businesses are increasingly choosing to access the internet using a mobile device, and the numbers doing so are growing, as ownership of internet-enabled devices rises. Smartphones are integral to people's lives as mobile devices supporting a growing range of functions from communication to navigation, to use as principal sources of news media, cameras, diaries and numerous other functions.

Overall, 94% of adults personally own/use a mobile phone with 52.4 million 4G mobile subscriptions. The proportion of adults in the UK with a smartphone has now reached 76% (as of 2017), with 18% of adults living in a mobile phone only home. Increasing coverage and take-up of higher speed 4G services is driving data use. The average volume of data consumed per subscriber per month is now 1.9GB.



Economic Benefits

Modern communications in all of their different and emerging forms, including mobile communications, help maintain and stable levels of economic growth and employment. Hence, the UK Government's continued commitment to the growth and development of modern electronic communications. These benefits include:

- Improve the ability of local businesses to operate and compete effectively through access to modern communications thereby helping to maintain and increase local employment opportunities.
- The contribution to the national economy is also significant where all businesses, from large to small, benefit from modern communications that helps them maintain and attract new business and service contracts in a responsive and competitive manner.
- Improve coverage over transport and infrastructure networks which improves the ability to work on the move and improve economic efficiency



Environmental Benefits

Modern communications, including mobile communications, provide effective protection of the environment by helping reduce the need to travel by enabling modern working practices such as greater home working. Such practices alleviate the pressure for new commercial development such as offices, through more efficient and flexible use of existing accommodation. For the same reasons, modern communications, including mobile communications, help ensure the prudent use of natural resources.



Social Benefits

Modern communications, including mobile communications, aid social progress, which recognises the needs of everyone. These improvements manifest themselves in a number of ways as illustrated by the following examples:

- People are now more likely to access the internet using a mobile connection than they are to have just a landline or to access the web through a fixed connection.
- Connecting to the Internet via a mobile device allows people to access a wide range of central and local government services; to do research for a school projects or apply to university; to manage their bank account and pay bills; to apply for a job; or to buy groceries.
- Most local authorities' services are now available online, and many councils have recognised the growth of smartphone use and introduced mobile phone applications to provide instant access to services, or to allow residents to report litter, dumped rubbish, pot holes and road repairs, or anti-social behaviour.
- Mobile devices enable flexible forms of working that provide opportunities to working parents or carers and help them achieve a better work life balance with both family and community benefits. By providing means of communication that improve convenience and enhance personal safety and security. This is especially important to vulnerable groups who may otherwise feel unable to participate in certain activities.

2.0 Planning Policy

This section sets out the most relevant national and local planning policy concerning the proposed development.

2.1. National Planning Guidance

National Planning Policy Framework (NPPF 2019)

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’ 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.

In this regard the Framework can be summarised as follows:

- Government policy is to support high quality communications infrastructure and systems as essential for sustainable economic growth;
- Government policy is to keep the inevitable environmental impact associated with electronic communications development to a minimum;
- The best way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites;
- The starting point for planning new networks or the expansion of existing networks is therefore to use existing electronic communications sites as and when applicable;
- The emphasis on minimising environmental impact is greater per the sensitivity of the site. The emphasis on exploring and utilising site sharing opportunities is consequently higher in these circumstances;
- Great weight should be given to conserving landscape and scenic beauty in certain specified designated landscapes, e.g. National Parks, Areas of Outstanding Natural Beauty, Conservation Areas, etc.;

The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. This is emphasised in paragraph 10 of the NPPF, which states that in order that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. The NPPF recognises that this is especially relevant where a development might have other significantly important benefits such as being essential to meet, for example, enhancement and improvement to existing communications infrastructure.

Paragraph 11 of the NPPF state that for ‘decision-making’, the presumption in favour of sustainable development 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:

- i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

As such, development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully with all relevant Development Plan and NPPF policies and, therefore, permission should be granted for the development.

The importance of the proposed development in providing the upgrading and expansion of the existing communications network is clearly an important material planning consideration as it directly supports sustainability and is also precisely the type of new digital infrastructure that the NPPF is seeking to support. The development proposed is comparatively small scale, sited where the principle of telecommunications development has been long established and therefore accepted, designed in a way that is predominately consistent with the existing infrastructure setup and so should be acceptable in every respect.

However, for completeness we still highlight some of the key points within the NPPF as they help demonstrate why the application should be permitted:

Paragraph 7 advises that the purpose of the planning system is to contribute to the achievement of sustainable development. It then states that: *“At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”* [our emphasis];

Paragraph 20 advises that strategic policies should *“make sufficient provision for.....telecommunications”* and that it should *“be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”*

Paragraph 38, on “decision-making” states that authorities should *“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”*.

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 NPPF (2019) directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

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

Leading on from this, paragraph 112 states that *"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. 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....."*. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, unlike the previous version it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

While supported, 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 retains the guidance set out in previous versions of the NPPF version and states that *"Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure"*.

As can be seen from the above, the NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this must include an understanding of the associated special problems and technical needs of developing and upgrading communications networks.

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.

The proposed development accords with all these aspects of the NPPF in that it will provide operators with improved network provision within this part of Ascot, bringing a range of associated economic and technical benefits.

NPPF Greenbelt considerations

Public benefits are defined within the NPPF 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. In addition to the above, the site is located within the Green Belt where Chapter 13 of the NPPF identifies that the Government attaches great importance to Green Belts, with the fundamental aim of Green Belt policy to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Furthermore, in order to set the context of the purposes of the Green Belt at National policy level, the NPPF sets out the five purposes of the Green Belt within para 134 as;

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Electronic communications development is not included in the list of acceptable uses within the Green Belt set out in paragraphs 145 of the NPPF and hence may be treated as inappropriate development. As engineering operations, however, electronic communications works benefit from the guidance contained in paragraph 146 of the Framework and should only be treated as inappropriate development where they affect the openness of the Green Belt.

Finally, it is significant that the development proposed will not offend any of the five purposes behind including land within the Green Belt as identified at paragraph 134 of the NPPF. To the contrary, the important contribution that 5G communications development will make to sustainability objectives will if anything help support those purposes. Access to mobile connectivity is now vital in agriculture, forestry, sport and recreation, housing, transport and indeed virtually all other activity within the Green Belt. As very special circumstances exist to justify development at this location, it accords with Green Belt planning policy.

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 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. Furthermore, 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 the aims 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. 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);
- 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.

Proposed Reforms to Permitted Development Rights to Support the Deployment of 5G and Extend Mobile Coverage (August 2019)

Although the application benefit from current permitted development rights, the applicant is mindful of the further recent government support for the development of digital connectivity set down within recent consultation on changes to permitted development rights.

Important text states that the Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where

they live, work, visit and travel. The Government is committed to extending mobile geographic coverage further across the UK, with continuous mobile connectivity provided to all major roads.

As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver prosperity at the local level and enable all places to share in the proceeds of growth.

The Government is determined to ensure the UK receives the coverage and connectivity it needs. The Future Telecoms Infrastructure Review, published in July 2018, sets out the Government's long-term strategy for meeting its digital connectivity targets. It restated the Government's commitment to tackling barriers to deployment and concluded that there were steps the Government could take in order to create the right conditions for the investment required to deliver additional network coverage and capacity.

The Government wants to be a world leader in 5G, the next generation of wireless connectivity, and for communities to benefit from the investments in this new technology. All of the four main mobile network operators have announced intentions to begin deployment of 5G networks in 2019 and the current application is a manifestation of this commitment.

The case for 5G is compelling as it will bring faster, more responsive and reliable connections than ever before. More than any previous generation of mobile networks, it has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time – creating the so-called "Internet of Things". This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for business and farmers, all through the real-time management of data.

2.2. Local Planning Policies

Section 70 of the Town and Country Planning Act 1990, as amended, requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.

The development plan has primacy in the assessment of applications made under the planning acts with the NPPF being a material consideration which carries considerable weight.

The relevant planning policy framework taking into consideration is found principally within:

- Adopted Local Plan

The most relevant policy that relates to assessing telecommunications in the Royal Borough of Windsor and Maidenhead is Policies TEL1, GB2 and GB2.

Policy TEL1

The Council will only grant planning permission for telecommunications development where:

- 1. There is no reasonable possibility of sharing existing facilities;*
- 2. In the case of radio masts, there is no reasonable possibility of erecting antenna on an existing building or other structure where there is little or no environmental damage;*
- 3. The proposed development does not have significant adverse visual impact and is sited and designed so as to minimise obtrusiveness;*
- 4. In the case of locations within the Green Belt, there is no conflict with Green Belt policies and particularly GB2;*
- 5. There is no conflict with other policies of the plan.*

The proposed site is also within the Green Belt, where Policy GB1 states that within the Green Belt, approvals will only be given, save in special circumstances, for;

- A) The construction of new buildings for the following purposes:
 - 1) Development for agriculture or forestry
 - 2) Essential facilities for outdoor sport and outdoor recreation, for cemeteries, and other uses of land which preserve the openness of the Green Belt and do not conflict with the purposes of including land in it
 - 3) Residential development in accordance with Policies GB3-GB5
 - 4) Limited infilling or partial or full redevelopment of designated major development sites in accordance with Policy GB9
- B) The change of use of buildings in accordance with Policy GB8
- C) Engineering and other operations and the making of material changes in the use of land which maintain the openness and do not conflict with the purposes of including land in the Green Belt.

Policy GB2 states that development in keeping with the above policy will not be granted in the Green Belt if it would;

- A) Have a greater impact on the openness of the Green Belt of the purposes of including land in it than an existing development on the site.
- B) Harm the character of the countryside because of:
 - 1) The scale, siting or design of the development or the materials employed.
 - 2) A material intensification in the level of activity on the site
 - 3) A material increase in the scale of development on the site
 - 4) The permanent loss of Grade 1, 2 or 3A agricultural land or of woodlands
 - 5) Harm to residential amenities in the locality, and
 - 6) Conflicting with any other policies in the plan

As previously highlighted, Para. 38 of the NPPF requires that Local Authorities work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Accordingly, it is considered that the proposal would assist in delivering the Local Plan Vision in respect of improved telecommunications infrastructure.

Central Government has expressed a support for new telecommunications installations and deployment of new technology. It is seen as essential for the country to develop and exploit the advantages of such new technology to the direct benefit of the public and the economy. It is seen that Local Government is key to the effective deployment of new technology as well as the upgrading of existing technology. Support and understanding from Local Government is needed to process planning applications, to offer the use of publicly owned assets to locate new equipment and to liaise with mobile network operators in creating the infrastructure required.

The proposed base station, required to replace the former rooftop site, which is decommissioned and removed as highlighted previously under Section 1 of this Statement, will enable the operators to maintain secure permanent 2G, 3G, 4G and 5G (when applicable) services to the surrounding area, thus improving the existing network of high technology. These services all allow home working and working on the move and subsequently reduce the need to travel, thus contributing to both Central and Local Governments sustainability agenda.

2.3. Assessment Against Policy

While it is considered that the proposal would be consistent with the aims of the NPPF in respect of supporting high quality communications, it remains the case that any such proposal should be well located and ensure there is no significant visual impact that would outweigh the social and economic benefits of the proposal.

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...*'.

Additionally, paragraphs 3.2 – 3.3 of the Code of Best Practice explain that there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs, the Code of Best Practice emphasises that the NPPF now applies a reduced policy test compared to previous guidance. This helps clarify that an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.

Economic and Social Benefits

The NPPF strongly supports sustainable development as does the Council's Core Strategy. 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 the need to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. This fully complies with the aims of the NPPF and the Council's Core Strategy to minimise the effects on climate change by reducing the need to travel and as a consequence the carbon footprint.

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 the junction of Andover Road and Athelsan Road, Winchester for the erection of a 17.5m street works pole).

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 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'*.

In addition to the above, this issue of public benefit and planning balance was also considered in Appeal Ref: APP/X5990/W/3162918 (55-59 Oxford Street). In this case, the Inspector found at Paragraph 20 *'Whilst I have paid special attention to the desirability of preserving or enhancing the character or 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 SCA. Therefore, whilst there is some conflict with WCP and UDP policies, the less than substantial harm that I have identified is outweighed by the clear public benefits of the proposal in maintaining and improving vital communications infrastructure at an important location'*.

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 also essential to fulfilling the potential of new technologies. Innovation such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

Paragraph 38 of the NPPF (2019) 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 brownfield registers and 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'.

Providing high quality 2G, 3G, 4G and 5G coverage and capacity within the area fully meets this aim of the NPPF. The social and economic benefits are significant material considerations which should be weighed against any visual impact associated with any mast at this location, whether a new mast or the alteration/replacement of an existing mast. In addition to the above, HM Treasury outline such benefits in its report *'Fixing the Foundations: Creating a more Prosperous Nation'* (July 2015). Paragraph 7.1 states 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 regulatory 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 in March, of near-universal 4G and ultrafast broadband coverage'.

Indeed, MPs have noted in parliament that the UK's Superfast Broadband connectivity was 'relatively poor'. As such, there has been continuing and growing strong national support for a high-quality communications infrastructure that is fit for purpose and helps promote the UK as a world leader in this regard, particularly with the roll-out of 5G coverage. Further to Government's commitment to improve connectivity, on 24th November 2016 the new 'permitted development' rights for telecommunications operators came into force, designed to lift the restrictions on mobile operators such is the significance of the significant weight that Government places 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. 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 sufficient digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global marketplace. 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’.* This Assessment goes on to further explain the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of maintaining high quality 2G, 3G, 4G and 5G coverage to this area, where the social and economic benefits significantly outweigh the environmental considerations.

Ministers from the DCMS and MHCLG wrote to all CEOs of the Council’s in England (March 2019) setting out the 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 outlines in the Future Telecoms Infrastructure Review, the Government would also like to see national full fibre coverage by 2033. We would also like the UK to be a work leader in 5G, with the majority of the population covered by a 5G signal by 2017. 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 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 communications network providers and those in both the private and public sectors who can provide sites for the installation of network equipment. The purpose of the reform 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 replacement mast will continue operators to provide high quality 2G, 3G and 4G coverage and capacity, as well as 5G when applicable, supporting the Government’s aim to ‘focus on ensuring everyone is connected to the information highway’. This fully meets the aspirations of the NPPF and the Council’s strategic strategy in respect of supporting sustainable development.

Site Specific Assessment

This supporting statement has justified the need for this proposal, and the installation of a replacement mobile phone base station at land southwest of Tittenhurst Park, London Road.

It is considered that the proposal before the Council adheres to the NPPF and the Local Plan, with no serious adverse effect on the character or appearance of the area, and no adverse effect on any special landscape designations. The Government is supportive of improvements in telecommunications networks within its jurisdiction and the proposal satisfies the requirements as per the NPPF and the Local Plan. The requirement for this new site is to address the removal of the existing telecommunications site at former Old Civil Service College, Larch Avenue.

The proposed greenfield column, in terms of its siting, set back within a natural environment within a private park, are such that its visual impact on the wider area is minimised as far as practicable given its operational requirements. It is considered that the proposal is therefore compliant with the provisions of NPPF and the Local Plan and, does not present any conflict with any other saved policies within the local plan. Consequently, it is considered that the development will not appear as an incongruous or over dominant structure in the longer distance views and the application site has been specifically selected to ensure that this is the case, utilising the existing natural environment and existing shrubs/trees to the best effect to ensure visual impact is reduced to the maximum extent, where practicable.

The proposed structure will be galvanised so that the contrast between the proposed mast, the existing O2/CTIL mast and the skyline is reduced. The ground-based equipment cabinets are to be fir green to minimise the contrast between the proposed equipment cabinets and the existing adjacent trees/vegetation, thereby minimising the visual impact on the area. Please advise if a different colour for either the mast or the cabinets would be preferable at the early stages of this proposal.

As demonstrated through the Alternative Site Assessment contained within this Design, Access and Supporting Statement, there is no alternative available existing structures, existing masts or existing buildings within the immediate locale than can be utilised to house this telecommunications apparatus with the exception of the existing O2/CTIL mast which would require significant redevelopment to accommodate EE. Should this application not be approved, the area will continue to suffer from severely reduced coverage and this would have an adverse impact on those that rely on this vital service and coverage from an economic, social and environmental perspective. Not least the Emergency Services are also reliant on the coverage the proposed replacement installation will maintain and provide improved services for all.

Ultimately, this location is considered to be the optimum location for the installation in terms of both technical and operational needs and minimising environmental impact, in particular landscape and visual impact. The design of the development proposed is the most environmentally sensitive available to meet the operational needs of the development and, as outlined above, will be in keeping with the character of the wider setting of the local area.

It has been demonstrated that the telecommunications development, having regards to the technical and operational constraints, has been designed to minimise environmental (particularly visual) impacts through careful siting and design choices. The proposal complies with national planning guidance and as such it is considered to provide the best location from both a technical and environmental perspective.

Any information required regarding location, height of antennas, frequency etc. can be found in the supporting documents, which are submitted as part of this prior approval application. As noted above and below, an ICNIRP certificate has also been enclosed. It is contended that the siting and appearance of the development is compliant with the relevant planning policy, as noted above, and could therefore be supported by your department. The following provides more justification in respect of the principle of the development being acceptable within a Green Belt location

Openness

Whilst 'openness' is not defined within the NPPF, openness is considered to constitute one of characteristics of the Green belt which helps to achieve these five purposes. As ever, the case law below provides us with a good backdrop against which to make any assessment on openness.

- R (Lee Valley Regional Park Authority) v Epping Forest DC[2016] EWCA Civ. 404, Treacy, Underhill, Lindblom LJJ:

"The concept of "openness" here means the state of being free from built development, the absence of buildings – as distinct from the absence of visual impact".

The application site is adjacent to Tittenhurst Park and near to the existing built environment to the north west along Silwood Road. To the north, on the opposite side of London Road, there is significant built environment associated with Imperial College London Silwood Park as well as numerous other buildings that form a strong established built environment to the north of the road. All of the aforementioned, along with further buildings, are located within the green belt. It is not clear as to the extent of this existing built environment within the Green Belt that would be considered as being 'appropriate' or 'special circumstances' for such development. However, it is likely that little, if any, would technically accord with the provision of the relevant local plan policies or that of national policy in this regard. In addition to this, there is existing telecommunications equipment located within the Green Belt within the locale and throughout the countryside that is required in order to service the level of development that exists within the designated Green Belt limits. If there is any friction with any of these purposes of the Green Belt, it would be the aforementioned built development which would create this friction and impacting on 'openness', rather than a small area within the Green Belt which has already been heavily developed within the general locale. Further consideration in respect of such development within the Green Belt is highlighted below.

- Turner v Secretary of State for Communities and Local Government & Anor [2016] EWCA Civ. 466

*"The concept of "openness of the Green Belt" is not narrowly limited to the volumetric approach suggested by Mr Rudd. The word "openness" is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. **Prominent among these will be factors relevant to how built up the Green Belt is now***

and how built up it would be if redevelopment occurs (in the context of which, volumetric matters may be a material concern, but are by no means the only one) and factors relevant to the visual impact on the aspect of openness which the Green Belt presents.” [paragraph 14, my emphasis]

The Green Belt at this location already experiences a large degree of building and infrastructure works as previously stated, which is in part due to its proximity to Ascot Racecourse somewhat dividing North Ascot and South Ascot, where the extent of the Green Belt designation ends. This infrastructure and built development are prominent within the streetscene within the general location. The addition of the proposed tower would not change the degree to which the Green Belt at this location is already built and would be marginal at worst.

- R (Lee Valley Regional Park Authority) v Broxbourne Borough Council [2015] EWHC 185(Admin):

“I would accept that the effect of development on openness may involve questions of degree and that there may be scope for some reduction in height and bulk offsetting some greater extent or spread of built area, and, if so, that how far the offset goes before the impact on openness increases can be a matter of impression. A conclusion on the degree of impact on openness is essential to reliance on the new flexibility for “previous developed land” in the first place ... and to the analysis of harm.”

In respect of the proposal and surrounding locale, the aforementioned existing built development does not just represent a degree of development, it is developed and will remain developed into the future, forming as it does long established buildings that are part of the built fabric of the area.

Taking these principles and applying them to this case we would contend that the extent of existing built development surrounding the development site means that the addition of the small-scale development of one telecommunications tower and associated cabinets could only ever have a very marginal impact on the ‘openness’ of the Green Belt, if any at all.

Engineering operations

Further, the NPPF sets out when some types of development may be considered as not inappropriate and hence, by definition, appropriate. This includes engineering operations – such operations tend to encompass development which is not a building but require the input from an engineer. There is some help from case law in this regard. Commenting on the case of Fayrewood Fish Farms Ltd v. Secretary of State for the Environment [1984] JPL 267 , David Widdicombe QC opined that;

“... the term ‘engineering operations’ should be given its ordinary meaning in the English language. It must mean ‘operations of the kind usually undertaken by engineers, i.e. operations calling for the skills of an engineer.’ These would normally be civil engineers but could be traffic engineers or any engineers which applied their skills to land.”

Hence, with the proposed development not being a 'building' and with engineering input with regard to the foundations, wind load and structural capacity of the structure, the proposed pole would fall firmly within that definition.

In terms of the Green Belt, taken together the appellant would contend that:

1. The proposed development is appropriate Green Belt development as it is an engineering operation.
2. Even if it is considered inappropriate, the very special circumstances exist to allow the development to proceed i.e. specific railway line coverage which cannot be achieved from any other location
3. Irrespective of the proposal being appropriate or inappropriate, openness is maintained at this location due to, not least the high degree to which the application and its immediate surroundings are already developed and hence openness already diminished.
4. Notwithstanding the above, those types of development and activities which are supported in the Green Belt increasingly either rely or are enhanced by connectivity to high quality communications networks. Roads, railways, physical phone lines and electricity poles are common and accepted features of all of the UK, especially those where people live and are close to where people live – this specifically must include the Green Belt. Whilst access to mobile networks is more 'modern' in some senses it is becoming as important and as accepted as those other traditional forms of infrastructure support.

It is considered that the above demonstrates that, if consideration was to even be given as to whether the proposal would potentially affect the 'openness' of the Green Belt, it would in fact represent special circumstance where development would be allowed within the Green Belt. As a result, the question as to whether or not the proposal would represent inappropriate development in the Green Belt would not arise in this instance.

Furthermore, it is believed that the proposal is given weight by the recent letter titled 'Collaborating for digital connectivity' by the Department for Digital, Culture, Media & Sport and Ministry of Housing, Communities & local Government, dated 7th March 2019, in which it states:

"Government is committed to supporting investment in high-quality, reliable digital connectivity so that communities can benefit from faster economic growth and greater social inclusion. 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. In 2016 the Gross Value Added from the digital sector was £116.5 billion, which equates to 6.7% of the UK economy, so the benefits for individuals and the UK as a whole are substantial.

...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...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”

It is apparent that the Government is pushing as a whole for telecommunications development to aid in cutting the current deficit in areas devoid of mobile phone coverage in both 4G and future 5G technologies. This proposal is part of the overarching plans to cut this deficit amongst others as stated above. The proposal is also assisting in meeting other aims and milestones, in particular the National Infrastructure Commission’s ‘Connected Future’ report in which they have identified that the UK’s Connectivity on main rail routes is distinctly lacking and therefore have set up project’s for Train Operating Companies to again cut this deficit – of which this proposal is part of. Given the above information it is believed that the proposal is given sufficient weight that outweighs any perceived negative impact a telecommunications site may have in land designations, and in this instance Green Belt.

The aforementioned DCMS letter finishes with stating the following: *“I hope you agree that we should work hand in hand to support the significant new investment in digital infrastructure that can benefit our communities. With this in mind, Government will give significant weight to the extent to which local authorities have adopted the principles contained in our guidance when allocating funding for future DCMS projects aimed at boosting investment in fibre or mobile networks.”* This again provides that Local Planning authorities should look to work with mobile phone operators in allowing for the deployment of infrastructure.

In consideration of the NPPF and the above referenced policy, along with the additional supporting justification, it is our belief that the development proposal meets the requirements of national and local policy along with the aims of Central Government, whilst having regard to technical and operational factors and providing the necessary level of coverage to this section of railway line and the surrounding area.

Lack of 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 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. This is contrary to national and local level policy which seeks to support the expansion of electronic communications networks including next generation mobile technology such as 5G.

Overall, it is clear that the proposal would be consistent with the sequential approach for upgrading telecommunications infrastructure and support the overarching principles of supporting high quality communication networks set out within the Framework and meet the requirements of the sustainable development objective and infrastructure requirements of the

NPPF which wholly supports the growth and improvement of operator networks via the use of existing telecommunications sites and site sharing between multiple operators over a new site when possible.

3.0 Access

Under section 42 of the 2004 Act, access requirements both to and around the site should be considered. It must be considered that this site is for telecommunications purposes only. Access to the site is to be taken directly from London Road via existing hardstanding access track. Maintenance visits are required approximately every 3-6 months by an operative with a light vehicle. Consequently, it is not envisaged that access to the site would cause traffic management or other issues.

3.1 Construction and Maintenance

During the construction process, all build and maintenance regulations will be complied with. Proof of compliance can be confirmed closer to the time of construction if necessary.

3.2 Public Access

Radio base stations are not designed to be accessible by the public. The equipment cabinets would be locked at all times and only accessible by authorised persons. Therefore, no specific public access provisions are required to be incorporated into the design of the proposal.

4.0 Regulatory Statement

EE is authorised to operate a public electronic communications network and supply public electronic communications services under the provisions of the Telecommunications Act 1984, the Communications Act 2003 and the Electronic Communications Code (Conditions and Restrictions) Regulations 2003 and aims to meet all reasonable customer demand for that service.

OFCOM statistics show that in 2013 mobile phones are owned / used by 92% of UK adults. This demonstrates the vital role mobile communications play in the social and economic wealth of the country. Whilst the vast majority of the UK now benefits from mobile coverage there are still spots without coverage. EE under their communications code licence to run a public communications network are duty bound to provide equal coverage to all areas of the UK. Therefore, the need for communications systems should not be tested by Local Planning Authorities, as it is for the communications code operators to determine locations where coverage is required and demonstrate in evidence.

The development proposed is to replace an existing EE installation which has been decommissioned and removed. Should this proposal **not** proceed, this area will continue to suffer from very poor coverage.

5.0 Health and Safety

Telecommunications planning guidance states that it is not for the local planning authority to seek to replicate through the planning system controls under the health and safety regime as it is a matter for the Health and Safety Executive. The Government guidelines state that provided a proposed base station meets the ICNIRP guidelines for public exposure, then it should not be necessary for the local planning authority to consider the impacts of health concerns.

It is confirmed that the proposed equipment and installation complies with ICNIRP guidelines and a Certificate of Compliance has been submitted in support of the application.

6.0 Conclusions

As part of their UK upgrading programme, EE now propose to upgrade coverage in this area to include 4G and 5G services which will maintain and provide improved data services to customers in addition to the existing voice and text services they enjoy. In addition, EE provide the new UK wide Emergency Services Communications Network (ESN) and their 3G/4G/5G network will support this service. As such, the proposed replacement installation will form part of the ESN for all of the emergency services operating within this area.

The telecommunications installation proposed as set out in this application has been designed and sited having regard to technical, engineering and land use planning considerations in order to minimise its impact on the local environment. The mast height has been kept to the minimum required to ensure operational efficiency - a structure with an overall height of 30 metres is needed in this locality because of the height of the existing trees in the greater surrounding area. Consideration has been given to the design of the mast and this is reflected in the standard greenfield column design, which is frequently used within rural/wooded areas.

In relation to planning policy, in accordance with the guidance set out in the NPPF and the Local Plan, a thorough search of the area has been undertaken and revealed that there are no existing masts or other structures suitable (with the exception of the existing O2/CTIL mast which would require significant redevelopment to accommodate EE). Therefore, the development of a new mast site is justified, and it has been demonstrated that it has been sited and designed to minimise its visual impact and all other environmental impacts as far as practicable in accordance with the development plan. The Council are therefore respectfully asked to approve its siting and appearance, in the event that they consider such prior approval is required.