

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Land at Norwood Green	Site Address:	Land at Norwood Green Norwood Road Southall London UB2 4JQ
National Grid Reference:	E513171, N178519		
Site Ref Number:	CTIL_245255 20	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

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

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why: Other sources checked		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: The proposed development is required to provide new 2G, 3G, 4G and 5G coverage to this area of Ealing, for Vodafone. As there are no existing installations which could provide this coverage, a new base station must be deployed within the area.		

Site Specific Pre-application consultation with local planning authority


Was there pre-application contact:	Yes
Date of pre-application contact:	10/05/2021
Name of contact:	The Chief Planning Officer

¹ Macro or Micro

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Summary of outcome/Main issues raised:

A pre-application consultation letter was issued to The London Borough of Ealing Council on 10th May 2021. This letter provided details of the proposed scheme and feedback was requested. A pre-application consultation letter was also issued to the Council's Highway's Department.

As of the date of this planning application, no formal response has been provided by the LPA or the Highways Department.

Given that this proposal will provide enhanced network coverage in the form of 2G, 3G, 4G and 5G, for Vodafone, at a time when our reliance on mobile connectivity is at an unprecedented level, it was considered appropriate to proceed with the submission of the application.

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	N/A
Summary issues raised:	
N/A	


Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
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Outline of consultation carried out:

As with all Cornerstone proposals, the site and proposed works were assessed against the Traffic Light Model contained within the Code of Best Practice on Mobile Network Development. An amber rating was assigned in this instance and pre-application consultation letters were sent by email on 10th May 2021 to the local Ward Councillors of the Norwood Green Ward and Virendra Sharma MP. As part of the pre-application consultation exercise for this application, notification letters were issued to the following residential properties:

- 1 – 44 (inclusive), Norwood Close, Southall, UB2 5RF
- 238, 240, 242, 244, 246, 248, 250, 252, 252A, Norwood Road, Southall, UB2 4JQ
- 254, 256, 258, 260, 262, 264, Norwood Road, Southall, UB2 4JH
- 22, 24, 26, 26A, The Rectory 26A, Tentelow Lane, Southall, UB2 4LE
- 2 St. Mary's Avenue South, Southall, UB2 4LS
- Tesora, Rookwood, Friars Lawn, The Grange, Norwood Green Road, Southall, UB2 4LA
- Flats 1 – 18 (inclusive), Elm View Court, Norwood Green Road, Southall, UB2 4LA
- Mao, Green Gates, Norwood Green Road, Southall, UB2 4LA
- 1 & 2 Woodbine Villas, Norwood Green Road, Southall, UB2 4LA
- 205 Norwood Road, Southall, UB2 4JF

A pre-application consultation letter was also issued to the Norwood Green Residents Association. All pre-application letters were issued on 10th May 2021.

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

As of the date of this planning application, no formal response was received from any of the local Ward Councillors, Virendra Sharma MP, any local resident, or the Norwood Green Residents Association, in relation to the 10th May 2021 consultation exercise.

School/College

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


A search for schools and non-domestic childcare institutions was conducted via Ofsted and Department for Education databases. Ssuk Childcare Club is situated approximately 90 metres from the application site. Snowflakes Day Nursery is situated approximately 65 metres from the application site. St Mary's Church of England Primary School is situated approximately 250 metres from the application site.

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Peapods Early Learning Centre is situated approximately 220 metres from the application site.

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

Pre-application consultation letters were issued to the following establishments, and feedback was requested:

- Ssuk Childcare Club, St Marys Church Hall, Norwood Green Road, Southall, UB2 4LA
- Snowflakes Day Nursery, Norwood Green Road, Southall, Middlesex, UB2 4LA
- St Mary's Church of England Primary School, 26 Tentelow Lane, Southall, UB2 4LE
- Peapods Early Learning Centre, Wimborne Avenue, Southall, Middlesex, UB2 4HB

NB – Consultation letters were issued to both the Headteacher and the Chair of Governors at St Mary's Church of England Primary School.

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

As of the date of this planning application, no formal response was received from any of the educational establishments listed above.

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


Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
<p>Details of response:</p> <p>As the application site does not sit within 3km of an aerodrome, it is not necessary to notify any Aerodrome Operator.</p>		

Developer's Notice

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Copy of Developer's Notice enclosed?	Yes	No
Date served:	10/05/2022 - Proof of delivery included within the application.	

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3. Proposed Development

The proposed site:

3.1 The application site is situated within Norwood Green, immediately adjacent to the pedestrian footway. Norwood Green itself is a triangle shape and is bounded on all sides by mature trees. Aside from the boundaries of the Green, it is of an open nature and has unrestricted views in all directions. Norwood Green is bounded, road-wise, by Norwood Road, Tentelow Lane, and Norwood Green Road. There are residential properties situated along all three roads (on the opposite side of the road to Norwood Green itself) and these properties face in the direction of the Green. The mature tree cover restricts direct, unobstructed, views of the Green from these properties.




Figure 1: Aerial view of application site and surrounding area, application site shown by red arrow (Source: Google maps)

3.2 Several previous planning applications have been submitted at this site, the first of which is planning application ref: 214766PNT. Prior approval was refused in September 2021, due to siting and appearance of the proposed monopole which 'by reason of their siting and height would constitute a dominant, and overbearing development to the detriment of the visual amenity and character of the Canalside Conservation area'. Following receipt of the above referenced refusal a review of the siting and design was undertaken. The proposal was redesigned in order to reduce the scale, appearance and visual impact of the site. The monopole height was reduced from 20m to 17.5m. This was lodged under application reference,

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216136PNT for which prior approval was refused in December 2021. This smaller scale design was again refused due to its siting and appearance, with the decision notice again stating, '*by reason of their siting and height would constitute a dominant, and overbearing development to the detriment of the visual amenity and character of the Norwood Green Conservation area*'.

- 3.3 It is withheld that the siting and design put forward in the previous application (216136PNT) is the most appropriate option in order to meet the technical requirements of the operator, with minimum possible impact on the surrounding area. This has been outlined within the previous application and will be outlined again within this application. The current application is a resubmission of the previously submitted proposal, with revised supporting information including photomontages and accurate plans.
- 3.4 The width of the pedestrian footway on Norwood Road (the south-bound carriageway side) is narrow, and therefore restrictive, for the purposes of deploying the necessary telecommunications apparatus. As such, the proposed apparatus will actually be positioned on the grass verge (of Norwood Green), immediately adjacent to the pedestrian footway. The application site sits within close proximity of mature tree cover, which measures 15 metres in height, and is particularly clustered at the junction of Norwood Road and Norwood Green Road. The selection of this application site is therefore intentional and makes the most effective use of the natural environment, ensuring the maximum level of screening is achieved by the most trees within the immediate area.
- 3.5 Norwood Road itself accommodates a number of vertical engineered solutions in the form of street lighting columns. These columns are all positioned on the pedestrian footway adjacent to the south-bound carriageway. As such, they will be seen in the same context as the proposed development, thereby reducing the visual prominence of the scheme. Given that most views will see the proposed monopole in the context of the existing streetlighting columns (in the foreground), and mature tree cover (in the background) which is actually taller than the proposed structure, it is considered that the scheme is wholly appropriate for the surrounding area.
- 3.6 The Applicants submit that the economic, environmental and social benefits which will be brought forward by the proposal will greatly outweigh any visual impact that may be caused by the installation of the scheme.

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- 3.7 The specific aim of this application is to provide improved 2G, 3G, 4G and new 5G network coverage for Vodafone to the local and surrounding community in this part of Ealing.
- 3.8 Given that 5G is the new emerging technological advancement of mobile telecommunications, it is considered that the provision of this cutting-edge service is a major positive for the local area. In order to achieve this, a new site must be identified in reasonably close proximity to the community it is designed to serve.
- 3.9 The scheme is in accordance with national planning policy, and the direction of the travel of Central Government in providing local communities with high-quality telecommunications networks. This, more than ever, is of paramount importance.

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


Network information is provided separately within this application.

<u>Type of Structure (e.g. tower, mast, etc):</u>	
Description:	
The installation of a 17.5m high telecommunications monopole supporting 6no. antennas, the installation of 2no. ground-based equipment cabinets and 1no meter cabinet, and ancillary work thereto.	
<u>Equipment Housing</u>	
1no Cabinet with dimensions 1898mmx798mmx1645mm	
1no Cabinet with dimensions 750mmx798mmx1645mm	
1no Meter Cabinet with dimensions 655mmx255mmx1015mm	
Overall Height:	17.5m
Height of existing building (where applicable):	N/A
Equipment Housing: See above	
Length:	
Width:	
Height:	

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Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel – Fir Green (RAL 6009)
Equipment housing – type of material and external colour:	Steel – Fir Green (RAL 6009) – or otherwise suggested by the Local Authority.

Reasons for choice of design, making reference to pre-application responses:	
<p>3.10</p> <p>3.11</p> <p>3.12</p> <p>3.13</p> <p>3.14</p>	<p>In designing the proposed scheme, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree.</p> <p>There are three main elements to a radio base station; the cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the links into the network either by fibre cabling or by dish antennas, power source (meter cabinet), feeder cables that link the equipment housing to the antennas and the various fixings, often referred to in general terms as “development ancillary to” the base station.</p> <p>The type of technology being deployed determines the type of equipment and antennas required, which in turn impacts upon the type of support structure and/or design methods than can be employed on an aesthetic level. In order for the base station to effectively provide coverage to the desired areas and fit in with the established network pattern, specific antenna orientations and heights, determined by the radio planners, must be achieved.</p> <p>The purpose of this installation is to provide enhanced 2G, 3G, 4G coverage, as well as brand-new 5G network coverage, for Vodafone to the surrounding area. In order to achieve this, the installation of a 17.5 metre monopole is required at the application site.</p> <p>As previously mentioned, the original planning application at this site, planning application ref: 214766PNT, prior approval was refused due to siting and appearance of the proposed monopole which <i>‘by reason of their siting and height would constitute a dominant, and overbearing development to the detriment of the visual amenity and character of the Canalside</i></p>

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Conservation area'. Following receipt of the above referenced refusal a review of the siting and design was undertaken. The proposal was then redesigned in order to reduce the scale, appearance and visual impact of the site. The monopole height was reduced from 20m to 17.5m. A second application for prior approval of a 17.5m monopole and associated development was refused in December 2021, again for siting and appearance reasons.

- 3.15 The height of the monopole being at 17.5 metres is necessary in order to allow the antennas to clear the surrounding built environment and enable the coverage to operate at its full potential. This structure was deemed the most sensitive structure for deployment, being a slimline monopole. In addition, the application site has been specifically selected to ensure it is positioned in close proximity to the mature trees which bound Norwood Green. As can be seen on the accompanying planning drawings, some of these trees measure around 15 metres, ensuring that the proposed development is either screened, or backdropped, and only the upper part of the mast may be visible from some viewpoints. This is a significant planning consideration and must be acknowledged by the Local Authority. As the existing trees screen the majority of the proposed development, the visual impact of the monopole will be reduced to great extent.
- 3.16 Norwood Green is a triangular recreation park, which is bounded on all three sides by mature trees. These trees restrict medium- and long-range views, and will continue to do so in terms of this proposal. This will assist in filtering public views of the proposed monopole, ensuring any perceived visual impact associated with the proposed scheme is reduced as far as practicable. As well as Norwood Green accommodating a significant number of mature trees along its boundary, there are also intermittent mature trees positioned along the pedestrian footway which sits immediately adjacent to Norwood Road. Additionally, a number of the residential properties positioned along Norwood Road accommodate mature trees within their front gardens. The combination of all of these mature trees will severely reduce the achievable direct views of the proposed development.
- 3.17 Norwood Road itself contains a number of streetlighting columns on the south-bound pedestrian footway. These vertical engineered features, which are positioned alternatively with mature trees, along Norwood Road, will allow the proposed apparatus to assimilate into the streetscene with ease. As such, it is considered that both the built- and natural-environment has been utilised to the best effect to reduce the prominence of the proposal,

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and thereby reduce any perceived visual impact associated with the proposed development.

3.18 Other design choices for the proposed apparatus were a traditional streetworks solution with a 'bubble headframe' (often seen at highways sites) or a lattice tower (often seen in either industrial or commercial settings, or in more rural areas). Whilst both of these installations offer individual planning merit, the slimline 17.5m monopole with a linear column was considered the best environmental and town planning solution for the local area. This slimline monopole is one which is now routinely deployed in suburban and urban areas. It is now recognised as a piece of street furniture with a sole function – to provide network coverage to a specific area. Consequently, these installations are now common in these areas.

3.19 As outlined in the General Permitted Development Order, the deployment of mobile phone base stations, up to a height of 25 metres (previously 20 metres), is accepted in principle by virtue of the legislation. This position has been confirmed by the Planning Inspectorate in a number of appeal decisions.

3.20 For example, in allowing appeal APP/E2205/W/20/3261389, which proposed the installation of a 20m-high telecommunications monopole and associated ground-based equipment cabinets, the Inspector included the following in their decision notice:

*"Part 16 of the Order establishes that the proposal is permitted development and therefore it is accepted in principle by virtue of the legislation. **Furthermore, there is no requirement to have regard to the development plan as there would be for any development requiring planning permission.** Nevertheless, Policies SP1, SP6 and ENV13 of the Ashford Borough Council Local Plan to 2030 are material considerations as they relate to issues of siting and appearance. In particular, they seek to secure high quality design and to avoid development that would cause loss or substantial harm to the significance of heritage assets. **Similarly, the National Planning Policy Framework is also a material consideration and this includes a section on supporting high quality communications** (emphasis added).*

3.21 In another example, in allowing appeal APP/G4240/W/18/3201704, which proposed the installation of a 20m-high telecommunications monopole and associated ground-based equipment cabinets, the Inspector included the following in their decision notice:

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“The permission granted under the GPDO is equal to an outline planning permission and the consideration of the proposed development is limited to its siting and appearance, not the principle of the development” (emphasis added).

- 3.22 Given that this scheme proposes to deploy a 17.5m monopole instead of a 20m monopole, immediately adjacent to 15m-high mature trees, it is clear that the visual impact of the development has been reduced as far as practicable. Whilst it is acknowledged that this scheme has previously been refused prior approval by the local planning authority, this application looks to provide revised supporting information in the form of photomontages and accurate plans.
- 3.23 The monopole has been proposed as a fir green colour (RAL 6009), to allow it to blend into the background of mature trees. This will assist in reducing the visual impact of the proposed apparatus and will assist in ensuring that the monopole assimilates with the immediate surroundings. Whilst the proposed colour scheme is considered wholly appropriate for this site, the applicant would be willing to adhere to any colour scheme deemed more appropriate by the local authority and would like the opportunity to discuss this with the local authority during the course of the application process should this be the case.
- 3.24 Along with the monopole, the necessary ground-based equipment cabinets are also proposed for installation. As can be seen from the accompanying drawings, the proposed cabinets will be coloured fir green (RAL6009). The cabinets will be positioned on either side of the proposed monopole, and are unlikely to contribute to any visual impact on the wider area. It should also be noted that the cabinets themselves qualify as outright Permitted Development.
- 3.25 The applicants have brought forward a scheme which has been designed to ensure that its visual impact is reduced as far as practicable. The screening offered by the mature trees will provide a natural backdrop, and will assist in reducing the prominence of the apparatus. As such, it is considered that the scheme is wholly appropriate for the surrounding area. It is therefore anticipated that this application will receive Officer support.
- 3.26 As detailed in this application, the scheme will play a vital role in the provision of enhanced 2G, 3G, and 4G network coverage, as well as brand-new 5G coverage, for Vodafone. The height, scale and size of the apparatus has been limited to the minimum required to provide this coverage. It is submitted that when the visual impact of the proposal is

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assessed, and weighed against the social, environmental and economic benefits associated with providing a high quality communications network to the local area, the proposal finds itself in favour.

3.27 It is therefore considered that the design is appropriate to the site, and surrounding area, and avoids any unacceptable level of impact.

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Health and Safety - including ICNIRP compliance

- 3.28 The Application Site complies with the International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines. A declaration of compliance is included with this Application.
- 3.29 5G is a more complex technology than previous generations, this means that ICNIRP issues are more restrictive, which, when combined with the stacked antenna arrangement means that the lowest height of streetworks pole which can now be deployed, is higher than that of previous generation technology. In order to support these new technologies, the deployment of a new 17.5m ground based structure as proposed in this application is required. This has already been reduced from the original application, which proposed a 20m monopole, and as such, this is the lowest possible structure in order to facilitate these technologies and operate safely.

4. Technical Justification


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

- 4.1 As stated, the proposed development will enable the provision of 2G, 3G, 4G and new cutting-edge 5G services for the Vodafone mobile network across the wider area.
- 4.2 2G was the second generation of mobile phone transmission, it introduced data services for mobile, starting with SMS text messages. 3G was an extension to this and enabled the use of data. The main technological difference that distinguishes it from 2G technology is the use of packet-switching rather than circuit-switching for data transmission. Increased data rate to a minimum of 2 Mbit/s for stationary or walking users, and 384 Kbit/s in a moving vehicle.
- 4.3 4G (LTE, the acronym used for 'Long Term Evolution') supports mixed data, voice, video and messaging traffic and offers speeds of up to five times faster than 3G, enabling network users with 4G devices to benefit from ultra-fast internet browsing, video streaming, gaming, e-mail and downloads. 5G is the next generation of mobile internet connectivity, offering faster speeds and more reliable connections on smartphones and other devices than ever before.

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- 4.4 Compared to even the most recent and efficient generation of mobile network, 4G, 5G is set to be far faster and more reliable, with greater capacity and lower response times. The technological improvement of 5G when compared to 4G is particularly noticeable in three areas.
- 4.5 Firstly, the bandwidth of 5G is around 40 times faster than current 4G speeds, which will enable large amounts of data to be transferred in a few seconds – for example a full length HD movie of 15GB will take around 6seconds to download on 5G. Secondly, 5G has an ultra-fast 1ms latency time, providing reliable and near-instantaneous responses between instructions to devices. This would result in an autonomous vehicle travelling at 100km/h would receive a stop signal after moving just 2.7cm. Connections are also ultra-reliable, with a very low error-rate. Thirdly, 5G is able to support up to 1,000,000 devices within a 1km² area, which will provide the backbone for the evolution of the Internet of Things.
- 4.6 The provision of poor communication services has well recognised economic and social impacts on communities and businesses. Importantly, the base-station would provide increased network capacity, allowing quality service provision to a higher number of people at the same time. Improving cellular connectivity is led largely by demand. The very high level of mobile phone use in the UK requires the installation of additional base stations to provide the necessary connections.

Coverage Plots

- 4.7 The 5G network is a unique technology and it requires a bespoke approach. It is not being rolled-out in the same manner as the previous 3G and 4G networks. We do appreciate that some Local Authorities have become accustomed to seeing a geographical coverage footprint of a new or upgraded site, where coverage plots were commonplace within applications. Unfortunately, the same is not available for the 5G network roll-out. There are no 5G network coverage plots being produced for individual cell sites as this is a very fast-moving project with the 5G network constantly evolving as more and more sites are added to the Operators' networks.
- 4.8 These 5G networks will build upon the existing 4G networks which will effectively form the infrastructure “spine” for this next generation of mobile networks. We respectfully remind all Local Authorities of the direction provided by the Government within the NPPF, i.e. that they should not seek to prevent competition between Operators or question the need for an electronic communications system (para 118), and also that the expansion of next generation mobile technology should be supported (para 115).

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4.9 4G coverage plots however have been produced for this application. Figure 2 shows the existing 4G coverage of the application site and surrounding area, and Figure 3 shows the 4G coverage with the proposed new installation.

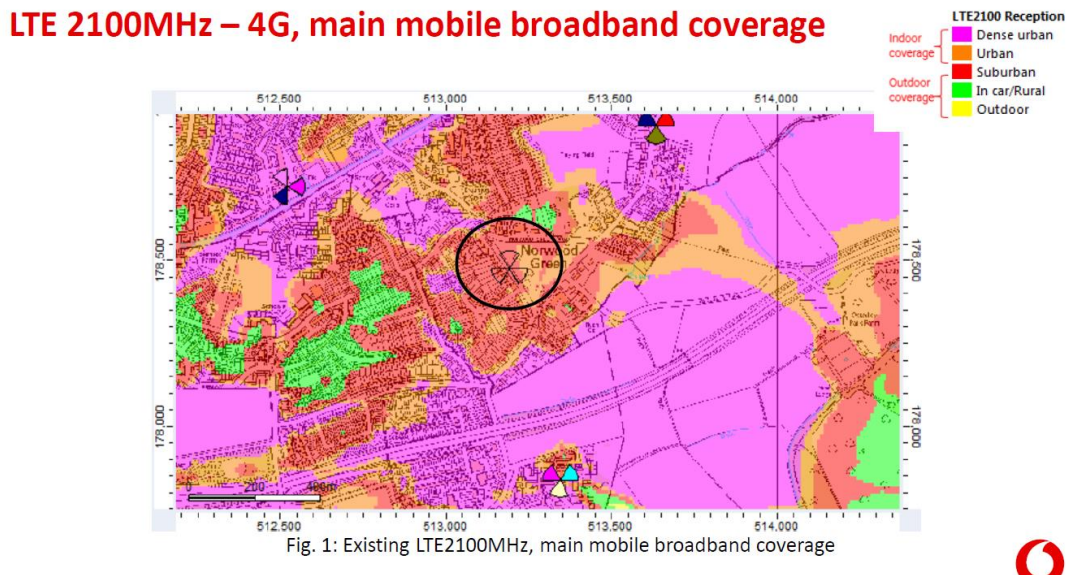


Figure 2: Existing Vodafone 4G coverage

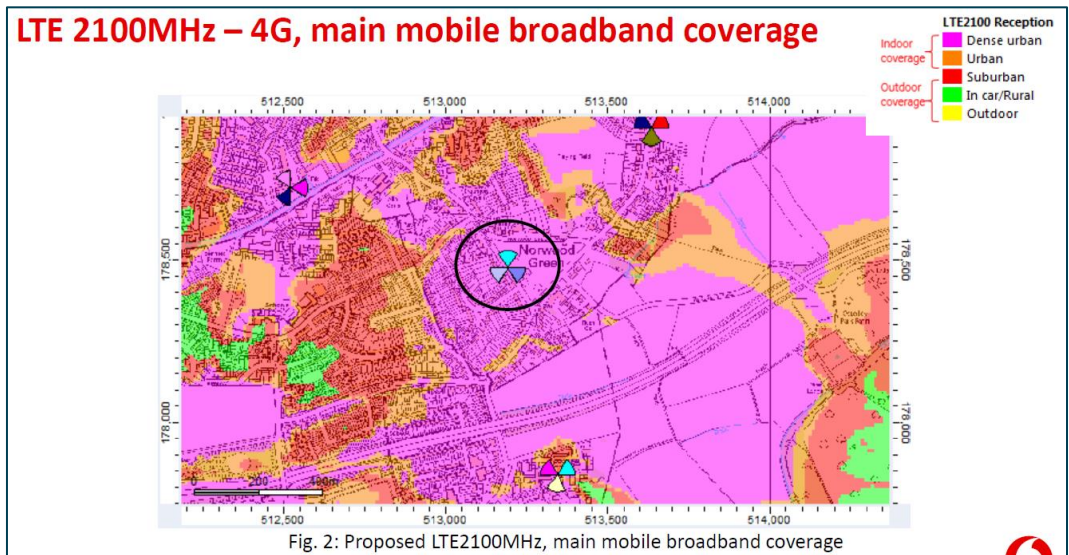



Figure 3: Vodafone 4G coverage with proposed application site

4.10 As can be seen from the above coverage plots, the application proposal goes some way to successfully achieve the technical objective. 4G coverage will be improved from a mix of suburban outdoor/urban indoor

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coverage to wholly dense urban indoor coverage, highlighting a proposed vast improvement in coverage to the Norwood Green area.

- 4.11 It should be noted that these plots only show the geographical coverage footprint, and do not show the improvements to the capacity of the network, although this is also a critical consideration which will also be significantly improved as a result of the new installation. For example, an area may be coloured “pink” indicating a strong signal strength, but if there is a heavy network demand in these areas, the network may not have the available capacity to provide a stable and fast connection to the users.
- 4.12 Due to the busy nature of this part of Ealing and the increase in mobile phone uptake, the existing installations cannot meet the current capacity demand.

Public Benefits

- 4.13 High-quality communications infrastructure is essential for sustainable economic growth and that high-speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.
- 4.14 Ofcom's 2018 Communications Market Research Report ² shows that smartphones are owned by four of every five UK consumers. While take-up of fixed broadband has plateaued at 80%, accessing the internet on a mobile phone continues to grow, from 66% in 2017 to 72% in 2018. Demand for data continues to grow rapidly for UK consumers, with 1.9GB consumed by an average mobile subscription per month in 2017, (up from 1.3 GB the previous year). The report found that more than seven in ten now use their mobile to access the internet.
- 4.15 More than any previous generation of mobile networks, 5G 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. 5G will have the ability to handle demand, offering faster download and upload speeds and enabling more devices to simultaneously access the mobile internet³. This proposal would provide higher mobile down-load speeds and more reliable, quicker mobile phone connections.


² https://www.ofcom.org.uk/_data/assets/pdf_file/0022/117256/CMR-2018-narrative-report.pdf

³ Mobile UK: <https://www.mobileuk.org/5g-benefits>

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- 4.16 The UK Government recognise the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. Paragraph 114 of the NPPF (2021) 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) ...”
- 4.17 The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal, to enable Vodafone to provide replacement and improved network services and capacity to the surrounding area, will assist in achieving these objectives within this area.
- 4.18 The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the upgrading of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.
- 4.19 This support for the improvement to the mobile communications network including 5G services was also set out in “Collaborating for Digital Connectivity” of March 2019⁴. The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion. Ministers stated: ‘...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’.
- 4.20 The latest amendment to Part 16 of Schedule 2 to the General Permitted Development Order (England) came into force in 2016, increasing the permitted development rights for installation of communications apparatus, demonstrating the importance that the Government attributes to delivering critical mobile digital infrastructure. In April 2021, the Government launched a consultation entitled ‘Changes to permitted development rights for electronic communications infrastructure: technical consultation’⁵ which

⁴ Collaborating for Digital Connectivity 2019: <http://democracy.epsom-ewell.gov.uk/documents/s17211/Telecommunications%20Equipment%20Wells%20Road%20Appendix%203.pdf>

⁵ Permitted Development rights - Open Consultation April 2021:


<https://www.gov.uk/government/consultations/changes-to-permitted-development-rights-for->

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looks at how to implement the proposals that were consulted on in August 2019, demonstrating sustained commitment for Government to enable the smooth rollout of the latest digital technology. The Minister for Digital Infrastructure, Matt Warman MP, outlines in this consultation:

'Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data in the United Kingdom 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.'

It is welcome that all four Mobile Network Operators have started to deploy 5G networks, meaning 5G is now available in over 200 towns and cities across the United Kingdom. We must, however, continue to ensure people have access to fast, reliable digital connectivity and mobile coverage. The planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliant on mobile connectivity.'

- 4.21 Following this consultation, proposed changes to the permitted development rights for electronic communications infrastructure have been approved and these amendments will be in place from 4th April 2022. These amendments build on the expanded permitted development rights for communications infrastructure, further demonstrating the significance of critical mobile digital infrastructure to the public interest and highlighting the importance of delivering 5G services in particular, and furthermore the importance of digital connectivity to the economic and social objectives of government.
- 4.22 These amendments are relevant to the application, as not only does it highlight the crucial need for the proposal but also, the Government's continued support and commitment to improving digital connectivity in England. Enhancing the mobile networks is of vital national importance in the short term, and it is significant that telecoms has been designated as "critical work" during this time, but it is anticipated that the current shift towards homeworking and online services will persist, to a lesser degree, in the future. It is vital that this critical infrastructure is in place throughout the UK to meet this demand.


[electronic-communications-infrastructure-technical-consultation/changes-to-permitted-development-rights-for-electronic-communications-infrastructure-technical-consultation](#)

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- 4.23 Mobile connectivity is becoming ubiquitous, and the expectation is that it should be available throughout the country. Ofcom's Connected Nations 2020 UK report⁶ explains the important role of Mobile Networks Operators (MNO's) such as Vodafone:

“We expect MNOs to leverage other benefits of 5G as they continue to rollout their networks and to provide connectivity solutions for both consumers and businesses. This includes private networks for businesses, which will facilitate greater control and privacy in addition to connectivity. (emphasis added)

5G will continue to target a range of other applications (e.g. manufacturing, logistics, agriculture, automotive, energy, media & entertainment and healthcare sectors) to deliver benefits to consumers, businesses and organisations. 5G (3GPP Release 16 & 17) has features such as near instantaneous network response (a latency of only a few milliseconds) and high reliability which are key enablers for these applications...”

- 4.24 The benefit of having a strong and resilient network has been highlighted over the past year, following the sudden shift in the network requirements due to the COVID-19 pandemic. The Government Minister of Digital Infrastructure, Matt Warman, stated during a Keynote speech, at a Connected Britain Event in September 2020⁷:

“The world is in the middle of a digital revolution. COVID has accelerated this process, digitising almost every part of our everyday lives and making the infrastructure that connects us more important than ever. That's why it is at the top of the government's agenda...”

We are taking forward legislative reforms to make it easier for you to deploy broadband in blocks of flats and to deploy or upgrade mobile phone masts.” (emphasis added)

- 4.25 More recently, as part of the Levelling Up White Paper⁸ released by the government in February 2022, one of the 12 'missions' of the paper, highlighting the importance of providing high quality communications

⁶ https://www.ofcom.org.uk/_data/assets/pdf_file/0024/209373/connected-nations-2020.pdf

⁷ Connected Britain 2020: <https://www.gov.uk/government/speeches/matt-warman-keynote-speech-at-connected-britain-2020>

⁸


https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1052708/Levelling_up_the_UK_white_paper.pdf

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infrastructure, states “By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for most of the population.”, allowing for strong business performance, growth and jobs in new sectors and raised living standards:

“The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation. Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working...”

More broadly, **high quality digital infrastructure can deepen local labour markets through remote working**, making it more attractive for both workers and companies to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive growth and jobs in new areas.

The sector also provides opportunities for raising living standards – median earnings for the sector are 50% higher than the UK average.”

- 4.26 The recognised public benefits of 5G are not just localised. PricewaterhouseCoopers (PwC) recently published an analytical forecast and review of the global economic impact of 5G⁹. This report outlines:

‘For policy-makers and governments, the key is to regard 5G as fundamental societal infrastructure: a platform that, by providing ubiquitous, superfast broadband, will influence the competitiveness of nations’ economies and their ability to develop their own sunrise industries and technologies. Policy-makers should look to encourage and provide incentives for 5G investments as quickly as possible.’

- 4.27 On a wider scale, the proposal would contribute towards the country's connectivity and digital economy future. Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion, and, on a local scale, it is important to ensure the improvement of telecommunications networks in this area.

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


⁹ PwC - The global economic impact of 5G: <https://www.pwc.com/gx/en/tmt/5g/global-economic-impact-5g.pdf>

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Education

- 4.28 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.
- 4.29 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

- 4.30 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.
- 4.31 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.
- 4.32 Further details regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the local planning authority in understanding any technical constraints associated with the proposed development. Further details of the benefits associated with mobile connectivity and 5G services can be found within the enclosed document titled 'Digital Public Benefit Brochure'.
- 4.33 The Planning Inspectorate too has in recent years continually recognised the importance of this issue and cited it in appeal decisions that have overturned the decisions of local authorities across the UK where there has been a failure to apply due weight to the value of connectivity to social and economic prosperity in the assessment of applications made for

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telecommunications development, even in or close to protected or sensitive areas.

- 4.34 As an example, in October 2018 the decision of Winchester City Council to refuse Prior Approval for the installation of a 17.5m high monopole and associated equipment housing, required to replace an established site being lost from Vodafone's network, was overturned by the Planning Inspectorate (CTIL and Vodafone Vs Winchester City Council, appeal reference APP/L1765/W/18/3197522). Within the decision notice, the Inspector stated that:

*"I attach significant weight to the public benefit arising from the continuation of local service provision....Having regard to all relevant considerations... **my findings are that the proposal's public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area**" (emphasis added).*

- 4.35 In October 2020, the decision of Elmbridge Borough Council to refuse planning permission for the installation of a 15-metre-high monopole incorporating shrouded antenna and supporting 2no external dishes was overturned by the Planning Inspectorate (EE Ltd and H3G UK Ltd Vs Elmbridge Borough Council, appeal reference APP/K3605/W/19/3243927). Within the decision notice, the Inspector stated that:

*"The mast would be taller and thicker than the existing nearby street lighting columns, road signs and overhead cable poles. Due to its height, the mast would be visible in local views from the public domain and from some residential properties in proximity....However, **such masts are becoming more commonplace within the urban environment and so it would not appear as an alien or unexpected feature**" (our emphasis).*

- 4.36 In June 2021, the decision of Sheffield City Council to refuse their Prior Approval for the installation of a 20-metre-high monopole and associated cabinets was overturned by the Planning Inspectorate (MBNL Limited Vs Sheffield City Council, appeal reference APP/J4423/W/21/3268791). Within the decision notice, the Inspector stated that:

*"Paragraph 80 of the Framework advises **that significant weight should be attached to the economic benefits of providing and enhancing electronic communications infrastructure**. Paragraph 112 advises that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being, and that the expansion of electronic*

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communications networks, including next generation mobile technology, such as 5G, should be supported.”

The proposal would reinstate 2G, 3G and 4G coverage within the area as well as providing 5G coverage, services would collectively increase network capacity and provide ultra-fast and more reliable mobile connectivity, capable of handling ever-increasing data requirements. The development would provide extensive social and economic benefits to individuals, businesses, and public services, including education and healthcare. The Council does not question the social and economic benefits that would result from the proposal but concludes that they do not outweigh the harm found. However, as no suitable alternative sites have been identified, I attach substantial weight to the benefits that would result from the proposal.

In weighing all the above matters, although I have found that the siting and appearance of the proposal would significantly harm the character and appearance of the area, I consider the substantial social and economic benefits of the proposal outweigh the harm identified” (emphasis added).

- 4.37 It is considered that when the balancing method advocated in the NPPF is applied to the proposal, where the need and significant public benefit of ensuring the best available network coverage is provided is balanced against the appearance and level of associated visual impact of the proposed site, that the application proposal is positively in favour and is considered wholly appropriate.
- 4.38 It is submitted that the same conclusions can be drawn from all appeal schemes outlined above – in that the high quality provision of telecommunications services, and the public benefits that they provide, is essential to the economic and social prosperity of the local area, and, when compared to the visual impact that each scheme would cause, the development was found in favour.
- 4.39 The same assessment can be applied in this instance. Given that the above appeals proposed brand-new monopoles measuring 17.5m, 15m, and 20m, respectively, all were considered to be acceptable, even if they resulted in clear harm to their surroundings. As this application proposes the deployment of a 17.5m monopole, reduced by 2.5m from the previously submitted application for this site, against a backdrop of 15m-high mature trees, it is considered to be wholly appropriate for the area.
- 4.40 The application site is situated within the Norwood Green Conservation Area. However, as previously highlighted, this location is well screened by

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mature trees which are typical of the immediate area. The context of the area is one which can absorb the proposed apparatus. The Key Views and Vistas, as outlined within the Norwood Green Conservation Area Appraisal (March 2007), are acknowledged, and the application site has been specifically selected to respect these, positioning the proposed apparatus on the western side of The Green, where these views are few when compared to the eastern side of The Green.


- 4.41 The above appeals show a clear trend in assessing telecommunications monopole developments, some taller than that which is proposed within this application, within urban areas. Despite impacts being identified, on heritage assets, the appeals were allowed by the Planning Inspectorate, which each Inspector placing great emphasis on the provision of high-quality telecommunications networks. The applicants submit that the same is evident in this case, and that despite the proposed development being positioned within Norwood Green Conservation Area, the impacts on this designation have been reduced to the maximum extent and achieve excellent screening via best use of the natural environment.

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5. Site Selection Process


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

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
Streetworks	Norwood Road & Alleyn Park junction, Southall, London UB2 4JQ	E513212, N178427	This location was investigated to ascertain whether it was capable of accommodating the necessary apparatus. The presence of underground services would limit the ability to deploy the site, as well as the lack of vertical visual screening resulting in a prominent feature within the streetscene. As such, this option was discounted in favour of the application site.
Streetworks	Norwood Green, Tentelow Lane, London, UB2 4LG	E513355, N178461	The location was investigated, and, whilst it would offer a suitable environmental and town planning option, it was considered inferior to the application site in terms of the natural screening (in the form of mature trees) available. Additionally, the Radio Planning team confirmed that the application site offers the best technical solution. This option was therefore discounted.
Streetworks	Thornccliffe Road, Norwood Green, London, UB2 5RG	E512914, N178580	This option was investigated. However, due to the lack of screening available, it was considered that this option did not offer the same desirable planning criteria that is available at the application site. This option was therefore discounted.
Streetworks	The Glen, Heston, London, UB2 5RS	E512916, N178351	An application was submitted to the London Borough of Hounslow Council for the deployment of a 12.5m telecommunications pole. This application was refused in August

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			2020. It is considered that the application site offers a significantly better location for the deployment of the necessary apparatus. As such, this option was discounted.
Streetworks	Fern Lane, Heston London, TW5 0HJ	E513116, N178133	The Radio Planning Team confirmed that this option would offer an inferior level of network coverage to the target area. Additionally, there is very limited screening which would not assist in the deployment of the necessary apparatus. This option was discounted.
Streetworks	The Wolf Norwood Road Norwood Green London UB2 4JT	E512922, N178734	The Radio Planning Team confirmed that the achievable coverage from this location, to the target area, was inferior to that provided by the proposed development at the application site. Additionally, the lack of nearby screening in the area would result in a more prominent structure on the skyline when compared to the proposed scheme. This option was therefore discounted on both environmental, and town planning, grounds.
Streetworks	Norwood Road, Norwood Green, London, UB2 4JB	E513013, N178715	Given the lack of natural screening at this location, this option is considered to have a greater visual impact on the surrounding area, when compared with the proposed development at the application site. This option was therefore discounted.

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

- 5.1 The above sites were investigated. However, it was considered that the most appropriate town planning and environmental solution has been brought forward as part of this application, and given the lack of viable alternatives, provides an excellent solution to ensure enhanced network services are provided to the local area.

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5.2 Given the restricted nature of the search area, and the need for the installation to be positioned within close proximity of the community it is designed to serve, the identification of viable options was challenging. Add this to the fact that the area is mainly residential, and the width of the pedestrian footway limits the deployment of the necessary apparatus on the highway, no better option than the application site could be identified. The application site itself provides desirable town planning criteria and is therefore considered to be both acceptable and wholly appropriate for the local area.

Land use planning designations:


5.3 The application site sits within close proximity to a number of mature trees measuring 15m in height. The selection of the site is intentional and aims to utilise the natural environment to the best effect, to screen the majority of the development, with only the upper section of the installation visible from some viewpoints. There is no evidence of any protected species or their habitats in this location, or that the location is in any way ecologically sensitive.



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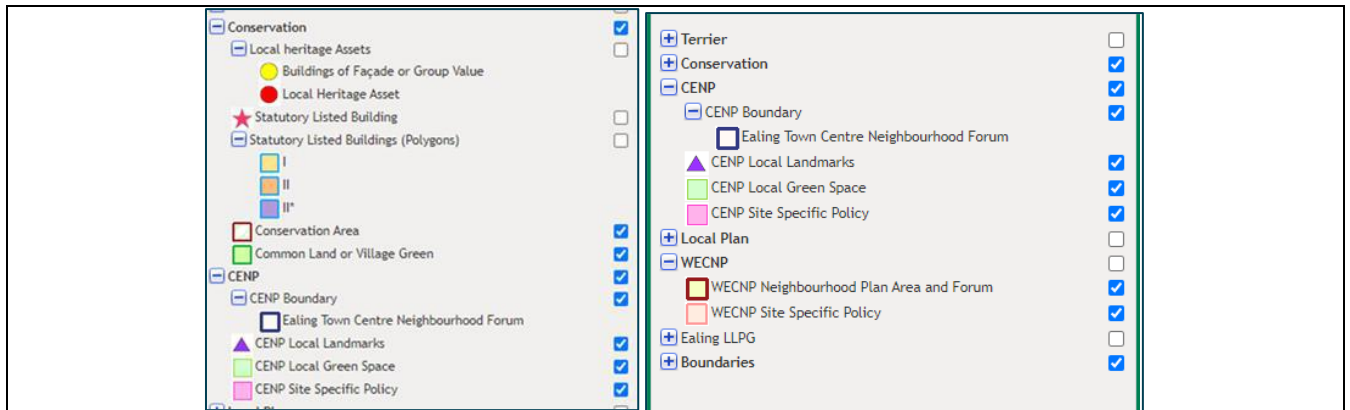



Figure 4: Extract from Ealing proposals map and key, application site shown by red arrow

- 5.4 As per the above, the application site sits within the Norwood Green Conservation Area. There are no Listed Buildings nearby.
- 5.5 Paragraph 194 of the National Planning Policy Framework (NPPF) places an onus on those proposing changes to historic assets to include a clear description of the significance of the assets affected. It is noted that the requirement in the NPPF is that *'The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'*
- 5.6 Regarding the character of the conservation area, the Norwood Green Conservation Area Character Appraisal (2007) states *'physical character of Norwood Green CA is mostly determined by the presence of the large open space of The Green'*. The proposed installation is sited at the edge of the green where there is substantial mature tree coverage, along the roadside where other street furniture is present. As such, it is not considered that the proposed installation will have a significant impact on the openness of this space or deter from the current character significantly.
- 5.7 Paragraph 200 of the NPPF states that, *'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'*.
- 5.8 It is not considered that the proposal would have a significant, negative impact on the importance or significance of the Conservation Area when viewed within this urban and modern environment. Whilst it is acknowledged that there will be some level of visual change, as previously outlined, this specific siting has been decided based upon its positioning within the

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conservation area; to the west of the green to avoid major views; and also the significant level of tree coverage which can be achieved here. This screening element is even more prominent given that the proposed height of the monopole has been reduced by 2.5m from the original scheme here.

- 5.9 Further justification of any harm has been provided in the form of the wide range of public and economic benefits as outlined in previous sections of this statement.

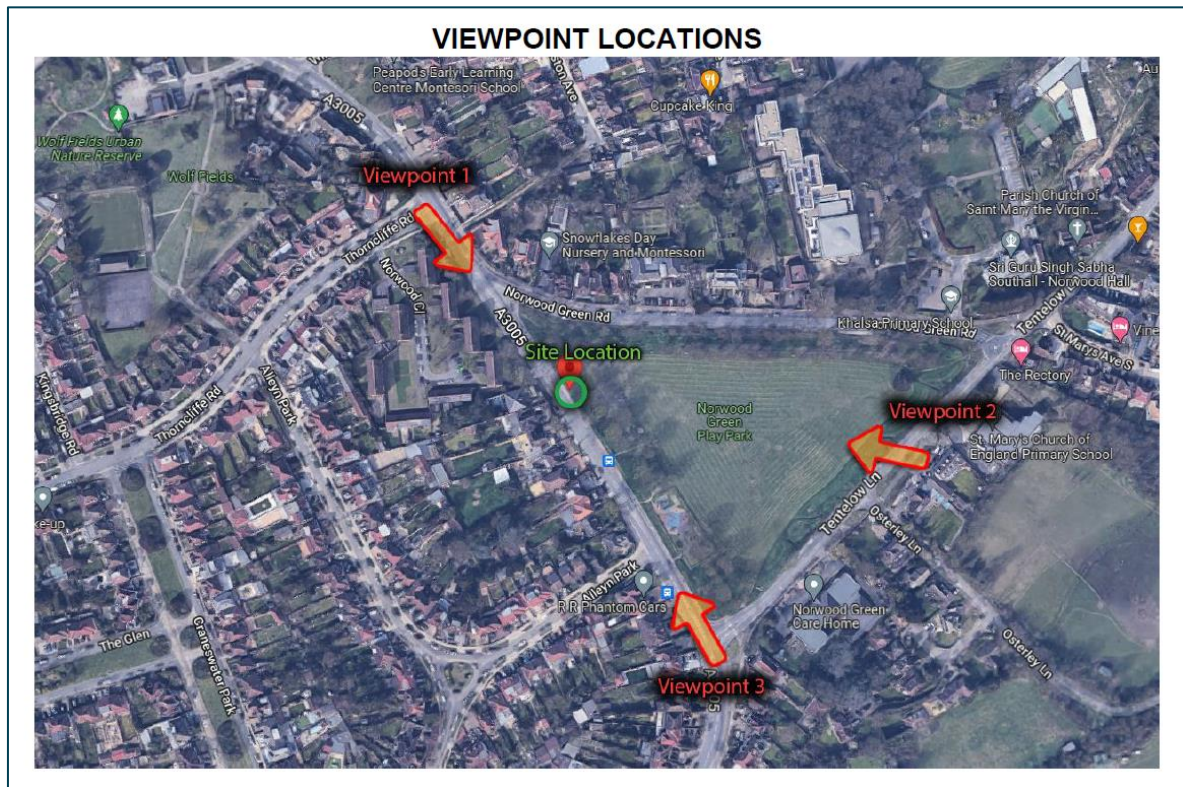


Figure 5: Overview of viewpoints for photomontages

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Figure 6: Existing and proposed view looking North-West from Norwood Road, at junction with Tentelow Lane, to Site

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Figure 7: Existing and proposed view looking West from Tentelow Lane, at junction with Osterley Lane, to Site

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Figure 8: Existing and proposed view looking South-East from Norwood Road, at junction with Thorncliffe to Site

- 5.10 Figures 6-8 show photomontage of the proposed development from various viewpoints, within the conservation area.
- 5.11 Figure 6 shows the existing and proposed view looking North-West from Norwood Road. As can be seen from this figure, only the upper section of the installation is visible above the tree line. When viewed in the context of both the existing telecommunications installation in the foreground and the existing street lighting columns lining the road into the distance, the small section of the installation which is visible, does not appear incongruous or out of place, and blends in with the other linear roadside infrastructure.

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- 5.12 Figure 7 shows the existing and proposed view looking West from Tentelow Lane, at junction with Osterley Lane, across the Green itself. Again, only the upper part of the installation is visible above the dense tree cover lining the edge of Norwood Green. When viewed in context of the dense tree cover and surrounding development, again it is not considered that the installation appears out of place, impedes any view across or through the Green, and does not have an impact on the openness of the Green.
- 5.13 Finally, Figure 8 shows the existing and proposed view looking South-East from Norwood Road, at junction with Thorncliffe. As can be seen from these images, tree cover which lines Norwood Road, along with impeding development such as the bus stop provides a significant level of screening for the proposed development. Given the proposed dark green colouring of the installation, the small part of the mast which is visible is camouflaged with the tree cover, and is hardly visible from this viewpoint. These photomontages provide further evidence to prove the minimal impact that the proposed development will have on the conservation area, the Green and the surrounding area in general.
- 5.14 The Officer's Report for the original refusal 214766PNT of a 20m pole in this location states *'The proposal should be sympathetically design and camouflaged where appropriate in order to reduce its impact on the openness of The Norwood Green Conservation Area. The proposed tower would not be appropriately camouflaged in this case and would disrupt views along the canal'*.
- 5.15 The Officer's Report for the previous refusal 216136PNT for the 17.5m pole as proposed in this application states *'The previous proposal should of been sympathetically designed and camouflaged where appropriate in order to reduce its impact on the openness of the Norwood Green Conservation Area. The 17.5m tower would not be appropriately camouflaged in this case. The structure would not fit well within its surroundings and would be readily visible from multiple views along the canal and from neighbouring gardens on Norwood Road.'*
- 5.16 As demonstrated above in the photomontages, particularly given the monopole design has been altered and reduced in height, it is considered that the mature tree cover surrounding the site, along with the presence of other street furniture in the immediate area allow for the proposed installation to benefit from sufficient camouflaging and screening, with only small sections of the mast visible from some viewpoints.

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5.17 Specifically regarding telecommunications development, the Norwood Green Conservation Area Management Plan (2007) states:

'Telecommunication installations are regarded as causing great potential harm to the historic character of Norwood Green. They would be unacceptable near Listed Buildings for their detrimental effect on their setting and they will also be resisted in any other part of the designated area where their presence is deemed to cause harm to historic character'

5.18 As previously outlined, the application site is well separated from any statutory or local listed buildings within the conservation area, meaning there will be no detrimental impact on their setting. The presence of a slimline monopole telecommunications installation at this site is not considered to cause significant harm to the historic character of the area; as per the above, the site is sufficiently screened and sited appropriately to cause minimal harm to the surrounding area.

5.19 Regarding 'harm', paragraph 202 notes that *'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'*

5.20 The limited harm identified is outweighed by the significant public benefits of the proposal as outlined extensively within this statement, and it follows that significant weight should be given to the need to allow the Applicant develop this communications site in view of the wider socio-economic and sustainable development benefits of ensuring high quality, reliable, mobile communications and connectivity services are in place.

5.21 The Officer's Report for the original refused application and for 214766PNT the more recently refused application both also state *'it is considered that whilst the proposed structures would be in line with tree coverage and lamp posts, it is considered that the appearance of the proposal would be harmful enough to warrant a refusal of this application'*.


5.22 Notwithstanding the fact that the proposal has undergone a redesign which means the equipment is reduced in size, the Planning Officer in this case has not given sufficient weight to the full extent of public benefits provided by the proposed development, to be balanced against any harm, as per paragraph 202 of the NPPF.

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5.23 Several examples of appeal cases where public benefits were found to outweigh the limited harm of telecommunications developments have been referenced previously within this statement.

5.24 Any harm to the setting of the Conservation Area that might arise as a result of the development subject to this application is clearly less than substantial and is outweighed by the benefits brought forward through the scheme.

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

Siting and Appearance

5.25 As previously outlined, a previous application for prior approval under application reference 214766PNT was refused on the grounds of that the proposed 20m monopole's *'siting and height would constitute a dominant, and overbearing development to the detriment of the visual amenity and character of the Canalside Conservation area'*. The proposal was then redesigned in order to reduce the scale, appearance and visual impact of the site. The monopole height was reduced from 20m to 17.5m. A second application for prior approval of a 17.5m monopole and associated development was refused in December 2021, again for siting and appearance reasons. The current application proposes the same 17.5m scheme, but provides revised supporting information.

5.26 The proposal is permitted development subject to applying for a determination as to whether the prior approval of the authority will be required, as to the siting and appearance of the development.

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

5.28 The applicant gives due regard in designing all new sites to limit the visual impact through good design. In this instance the proposed installation is subject to technical and build constraints. That notwithstanding, it is submitted that the appropriate siting and design put forth will mitigate any potential impact on the site and its surroundings to acceptable level. It is considered that the proposal offers the least visually intrusive site and design available to the applicant which also ensures suitable new and enhanced mobile coverage can be provided to the wider area.

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- 5.29 The proposed application is for a new ground-based monopole on the outer-boundary of Norwood Green. The apparatus will be positioned on the grass-verge immediately adjacent to the pedestrian footway, and within close proximity to a number of mature trees, which measure 15 metres in height. Given that the proposed apparatus measures a top height of 17.5m, with a reduction in height of 2.5m from the previous application at this site, it is clear that the structure will only be partially visible the existing tree line, as demonstrated in the above photomontages, and therefore have no impact on the local skyline. The level of local mature tree cover is significant, with public views of the proposed development being filtered and obscured to the maximum effect.
- 5.30 As shown in Figure 7 above, direct views of the installation, across The Green, will be difficult to achieve, with the monopole intentionally positioned to the rear of the treeline, and adjacent to Norwood Road pedestrian footway. The coloured nature of the structure (Fir Green) further ensures that the prominence of the apparatus is reduced to the maximum extent.
- 5.31 The proposed monopole has been reduced from 20m to 17.5m in height. This is the smallest height of any new monopole which can be deployed to provide 2G, 3G, 4G, and 5G network coverage from this location.
- 5.32 Whilst it is acknowledged that the monopole will be visible from certain vantage points, its prominence will be significantly reduced because of the presence of mature trees which dwarf the proposed development. This therefore ensures that the development will not be visible above the tree line, and that direct views from Norwood Green, Norwood Green Road and Tentelow Lane, will be very difficult to achieve. The proposed apparatus – both the ground-based equipment and the monopole – will be painted Fir Green (RAL 6009), which will assist the apparatus in assimilating into the local surroundings with ease, and blending with the mature trees of Norwood Green. Whilst the monopole may be visible from various vantage points, it must be stressed that visibility does not equate to harmful impact and that visibility is not the same as harm. A partial view will not impede use or enjoyment of the surrounding spaces.
- 5.33 The positioning of the proposed apparatus, in close proximity to these mature trees, is wholly intentional, and will ensure that the majority of achievable views will be along Norwood Road. However, these views will be backdropped by 15m-high mature trees, with vertical engineered structures positioned along the south-bound pedestrian footway in the form of streetlighting columns. To this end, the apparatus will assimilate into the

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immediate area, either being screened, and amongst, engineered features, but also backdropped to the maximum extent.


- 5.34 Identifying a location which provides both suitable screening and backdrop should be considered desirable from a planning perspective. The application site achieves this. Given the alternative sites within the local area, it is submitted that the optimum planning location has been identified and brought forward as part of this application. The applicants submit that no better, alternative site can be identified within the local area, and that no better designed, or smaller, structure can be deployed to provide the necessary network coverage.
- 5.35 The linear design of the monopole will assimilate with other vertical engineered structures within the area and ensure that its prominence is reduced as far as practicable. It is considered that the public, economic and environmental benefits associated with the proposal would outweigh the visual impacts of the development, and therefore should be supported by the Council. Given these engineered features on the local landscape, it is submitted that the proposed monopole would not appear as an incongruous feature within the existing landscape. Given the very restricted geographical area, in terms of deploying the necessary base station, it is considered that the optimum town planning solution has been brought forward, which also provides the optimum site in terms of achievable operator network coverage to the surrounding area.
- 5.36 Further to this, the application proposal has previously undergone a redesign, reducing the height of the monopole from 20m to 17.5m in order to overcome some of the concerns from the Local Planning Authority regarding the installations impact on visual amenity and the Conservation Area. This reduction in height means there will be a reduction in achievable views, minimising the impact on the surrounding area. The installation will also benefit from greater screening from the surrounding mature trees, again reducing the potential impact on the surrounding area.
- 5.37 As discussed within this application, a comprehensive search of the area has been undertaken to identify a suitable location for the necessary apparatus. This site has been selected as the most suitable option in terms of meeting the technical requirement for this area, as well as ensuring that the optimum environmental and town planning solution.
- 5.38 The Government has clear guidance on the balance Local Authorities must take between these two factors – technical achievements of

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telecommunications developments and visual impact – and this will be clarified below.

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

Planning Policy Context

National Policy

National Planning Policy Framework (NPPF) 2021

- 5.40 Paragraph 7 of the NPPF states: *'The purpose of the planning system is to contribute to the achievement of sustainable development'*, and in paragraph 10 that *'at the heart of the Framework is a presumption in favour of sustainable development'*.

- 5.41 The NPPF identifies objectives to achieve the aim of sustainable development:

'a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure ;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.' (paragraph 8)

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5.42 The proposal would meet the aims of sustainable development with respect to providing critical mobile digital infrastructure to underpin local economic growth; facilitating social inclusiveness through the provision of effective electronic communication services; and in an environmental role through supporting home-working, for example, which is linked to a reduction in transport emissions and therefore climate change mitigation.

5.43 Paragraph 114 emphasises the significance of delivering the latest communications infrastructure:

'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.'

5.44 The proposal is such 'essential' infrastructure, delivering high quality mobile technology, and as such it is national policy that planning decisions should support such proposal.

5.45 The NPPF encourages the use of existing buildings for new electronic equipment, paragraph 115 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.**' (Emphasis added)*

5.46 There is no opportunity to utilise an existing telecoms installation in this case. However, the proposal has been designed and sited sympathetically, as outlined within this document, and as such the proposal therefore adheres to paragraph 115 of the NPPF.

Development Plan

5.47 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

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considerations. 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.

- 5.48 The current adopted development plan for The London Borough of Ealing Council comprises of The London Plan (2021) and The London Borough of Ealing Council Development Strategy 2026: Development Plan Document (Adopted April 2012) and The London Borough of Ealing Council Development Management DPD (Adopted December 2013).

The London Plan 2021

- 5.49 A new London Plan was adopted in March 2021. In a similar fashion to the previous London Plan (2016), the new London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In 'Policy SI 6: Digital Connectivity Infrastructure' the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to ensure its global competitiveness, now and in the future.

- 5.50 It is considered that the Operators' networks are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. The written justification for Policy SI 6 states the following:

*"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.***

Access for network operators to rooftops of new developments should be supported where an improvement to the mobile connectivity of the area can be identified (emphasis added).

Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their Development Plans".

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- 5.51 Policy SI 6, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing Vodafone to provide continued and significantly enhanced coverage to the surrounding area. The proposed development meets the aims of the London Plan (2021) and the long-term strategies which the Mayor aims to achieve through this guidance.
- 5.52 The Decision Notice for the original refusal 214766PNT and previous refusal 216136PNT noted that the proposal is contrary to a number of policies within the London Plan; policies D4 Delivery good design, D8 Public realm and HC1 Heritage conservation and growth.
- 5.53 Previous sections of this document have outlined the justification and appropriateness of the design, including any impact on the public realm and heritage assets. The Officer's Report also omits policy support in the London Plan for improved digital communications as outlined above, contributing to the planning decision being imbalances. Whilst in this case, it would be argued that the proposal would not result in significant visual harm, reference should be made to the balancing exercise in the NPPF of harm Vs public benefit. As such, it is considered that the proposal is in compliance with these policies.

London Infrastructure Delivery Plan 2050 (published 2014):


- 5.54 As part of the work on the 2015 London Plan Alterations, the Mayor commissioned work to develop a long-term infrastructure investment plan for London, and in 2014 the 'London Infrastructure Delivery Plan 2050' was published. The stated aim of the Infrastructure Delivery Plan is to provide for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 of the Plan, Digital Connectivity, indicates how the Mayor's Office will support a mix of technologies including mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term, as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. Deployment of the proposed base station will contribute to London's agenda for reliable high-speed communications as it has been designed to incorporate emerging and future technologies. Among other matters the Delivery Plan stated:

"Broadband is now considered the fourth utility. The Government has stated that it wants 99% of the population to have superfast connections by 2018. Internet access speeds and coverage affect the productivity of businesses and are now a factor considered by homebuyers. Access is not only

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essential to many businesses, but also, as more local authorities are encouraged to move the services they provide online, access is essential for residents to be able to take part in a modern society. The Mayor wants every resident and business in London to be able to have affordable high-speed internet connectivity, should they choose to access it”.

- 5.55 This proposal seeks, individually, to provide high speed internet connectivity throughout London.

The London Borough of Ealing Council Development Strategy 2026: Development Plan Document (Adopted April 2012):

- 5.56 There are no policies relating directly to telecommunications development within the London Borough of Ealing’s Development Plan. As such, greater planning weight should be given to the National Planning Policy Framework (2019) (NPPF) and The London Plan (2021), which, as outlined above, is largely supportive of telecommunications development.

- 5.57 Whilst there is no specific telecommunications policy, the following policies are particularly relevant to telecommunications developments within the Council area:

POLICY 1.1 SPATIAL VISION FOR EALING 2026

‘(a) By 2026, we aim to provide **14,000 additional homes**, 94,500 sqm of **new office floorspace**, decrease our net stock of industrial floorspace by 57,000 sqm (equivalent to 14 hectares) through managed release¹¹ and provide up to 128,400 gross sqm of **new retail floorspace**’(emphasis added).

POLICY 1.2: DELIVERY OF THE VISION FOR EALING 2026

‘(d) To make provision of appropriate **physical, social and green infrastructure** in the right locations and at the right time to support the levels of housing and employment growth to be delivered in Ealing’ (emphasis added).

CHAPTER 6: ENSURING SUSTAINABLE DELIVERY

‘To create sustainable communities, providing housing and employment opportunities alone is not sufficient. **There is a need to provide the necessary supporting ‘infrastructure’ of transport, schools, open space, community, health, utilities and leisure services etc to support the local population and those who visit or work in the borough. A range of organisations provide these services...**’ (emphasis added).

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- 5.58 There is clear support for the provision of high quality telecommunications networks within the Council area. This is supported by the direction of travel taken by Central Government and the benefits of the proposal are significant – with the social, economic and environmental benefits considered to greatly outweigh any perceived harm that may result from the proposal.
- 5.59 The scheme's visual impact has been reduced to the maximum extent, this is solely down to the good design of the apparatus, as well as the site selection and excellent screening solutions that is offered by mature trees which actually measure a taller height than the proposed scheme. This is particularly prominent with the height of the monopole being reduced by 2.5m from the previous application.
- 5.60 The Decision Notice for the original refusal 214766PNT and the most recent refusal 216136PNT also noted that the proposal is contrary to Policy 5.3 Protect and Enhance Green Corridors of the Ealing Development Plan Document.
- 5.61 As per Figure 5 below, the application site itself is not located within a Green Corridor, and as such the proposal will not have any impact on any Green Corridors. Further to this, the application site is at the edge of the park and would not undermine its function as a green space, any impact on the surrounding area has been minimised as far as technically possible, and fully justified within previous parts of this document. As such, the proposal is not contrary to Policy 5.3.

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Map 7: Green and Open Spaces in Ealing

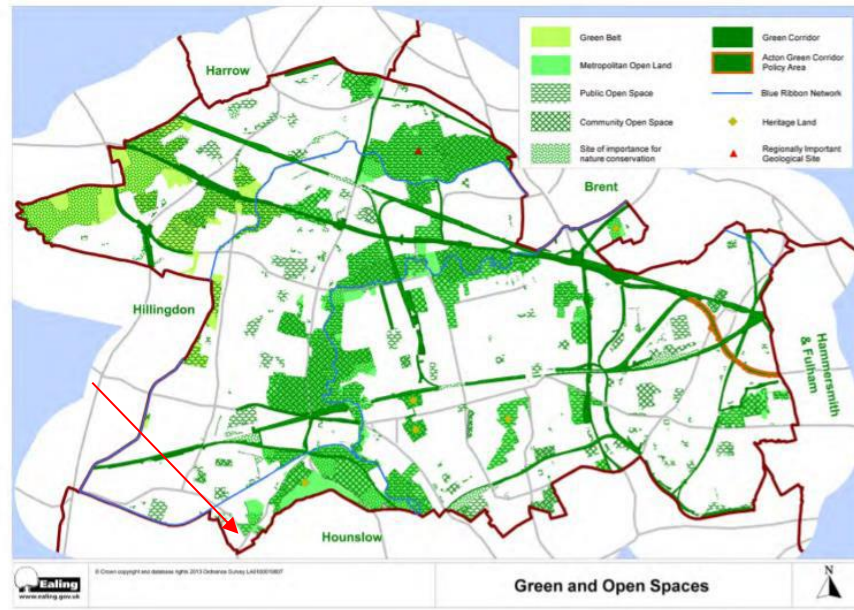


Figure 9: Map of Green and Open Spaces in Ealing, extract from Development Plan Document, application site shown by red arrow


The London Borough of Ealing Council Development Management DPD (Adopted December 2013)

- 5.62 As per the above, there are no policies relating directly to telecommunications development within the London Borough of Ealing's Development Management DPD (2013), again meaning greater planning weight should be given to the National Planning Policy Framework (2019) (NPPF) and The London Plan (2021), which, as outlined above, is largely supportive of telecommunications development.
- 5.63 The Decision Notice for the original refusal 214766PNT and the most recent refusal 216136PNT also noted that the proposal is contrary to Policies 7.4 Local Character, 7B Design Amenity and 7C Heritage of Ealing's Development Management DPD.
- 5.64 Regarding Policy 7.4 – 'Local Character' and Policy 7B – 'Design Amenity', much of the policy requirement can't be applied to telecommunications development. The design of the installation has been fully justified in previous sections of this document, and given that the proposed development is sited on the roadside and in close proximity to several other street furniture installations typical of such roadside area, it is considered that the scheme will be in keeping with the surrounding area. It is considered that the proposal complies with these policies, as the apparatus has one

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function: to provide network coverage to the local area. The design of the proposal is dictated by the technical requirements for the site, but all equipment has been minimised as far as possible, including reducing the height of the monopole from the original application, in order to provide the most appropriate design for the setting and reduce the impact on the surrounding area as far as technically possible.

5.65 Regarding Policy 7C, the proposal's impact on the Conservation Area has been outlined and justified in previous sections of this document. It is considered that the design and materials used will not undermine the significance of the conservation area, the installation is not out of keeping within its roadside setting and the substantial level of tree screening will greatly reduce any impact on views. It is considered that the less than substantial harm on the conservation area will be greatly outweighed by the previously outlined vast public and economic benefits which will be brought forward by the scheme.

5.66 As per the above, it is considered that the proposed development is not in conflict with the Development Plan and it is anticipated that this proposal will receive Officer support. The applicant considers that the best town planning and environmental solution has been brought forward within the application.

Other Relevant National Guidance

UK Digital Strategy

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


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

*'5G is the next generation of mobile connectivity, and is currently in development. It is expected to represent a significant upgrade: **providing ultrafast, low latency, and more reliable mobile connectivity, able to handle our ever-increasing data requirements.** This should present huge opportunities to boost productivity and grow the economy. In addition to*

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giving consumers and business users high quality connectivity, it will also support the development of the **Internet of Things: the rapidly-increasing number of connected devices, from connected cars to digital health applications.**'

Future Telecoms Infrastructure Review

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

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

*'The technical capabilities and performance characteristics of 5G are clear. **5G is expected to deliver faster and better mobile broadband services to consumers and businesses**, and to enable innovative new services for industry sectors, including manufacturing, transport, immersive technologies and healthcare.'* (p 10)

Ofcom Reports

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

*'We all need high-quality communications. In the modern world, a huge amount of our time is spent using communications services: for work, to stay in touch with family and friends, and in order to go about our daily lives. **Our ability to access and use reliable mobile and broadband connections has become fundamental to the way we work and live, and to the ability of businesses of all sizes to thrive.** For many people, internet connectivity is now as essential as gas or electricity, and access to traditional television, radio, fixed phone lines and postal services continue to remain important.'* (2016 report)

- 5.70 Planned economic growth cannot be sustained without the provision of essential utility infrastructure, including access to reliable, resilient and high-speed electronic communications. The proposal would increase the

Summary

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

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Registered Address:

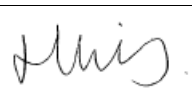
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- 5.71 National Planning Policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for a continued and improved quality of service.
- 5.72 This application involves the installation of a new telecommunications site to provide enhanced and increased capacity and ensuring new 5G coverage for the Vodafone mobile network is provided. The proposal has been redesigned, reducing the height of the monopole from 20m to 17.5m from the original application in order to reduce the scale, appearance and visual impact of the site. This application provides revised supporting information in support of the proposal, and it is withheld that the option and design put forward is wholly appropriate.
- 5.73 It is considered the proposal complies with both national and local policy. It is of significance that the development will ensure brand-new 5G coverage within the local area, clearly of public benefit to the local community and services. The significant network benefits this proposal will bring to the immediate surroundings, as well as the neighbouring sites, are considered to greatly outweigh the minor visual impact of the site to the surrounding area.
- 5.74 The proposal is fully compliant with ICNIRP guidelines.
- 5.75 On balance, the application warrants support and there are no material considerations that indicate otherwise.


Confirmation that submitted drawings have been checked for accuracy

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