

### SUPPLEMENTARY INFORMATION

#### 1. Site Details

Site Name:	The Crown Car Park	Site Address:	Land at the Crown Public House Car Park Crown Public House Car Park
National Grid Reference:	E:513058 N:184102		Ealing Road Ealing UB5 6AA
Site Ref Number:	307102_00	Site Type: <sup>1</sup>	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?		No
If no explain why:  No mast register available.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why:  N/A		

##### Site Specific Pre-application consultation with local planning authority


Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised:  A copy of the proposed plans together with a covering letter were sent to the Chief Planning Officer on 01/09/2023.  At the time of making the application no response had been received.	

<sup>1</sup> Macro or Micro

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### Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	
<p>Summary issues raised:</p> <p>Cornerstones commercial relationship with VMO2 has changed, effectively increasing our independence to work with other companies in the deployment of mobile infrastructure. It means we no longer have visibility of VMO2 full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance.</p> <p>Cornerstone aim to engage and work with the planning department at the earliest opportunity from when we are instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss our wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans then please advise. Cornerstone recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.</p>	

### Community Consultation

Rating of Site under Traffic Light Model:	<del>Red</del>	<b>Amber</b>	<del>Green</del>
<p>Outline of consultation carried out:</p> <p>Pre-application consultation was carried out with the Northolt Manderville Cllrs and MP James Murray. Pre-application consultation letters and drawings of the proposals were sent to these parties on 01/09/2023.</p>			
<p>Summary of outcome/main issues raised (include copies of relevant correspondence):</p> <p>No response to pre-app at the time of making the application.</p>			


### School/College

<p>Location of site in relation to school/college (include name of school/college):</p> <ul style="list-style-type: none"> <li>Buds to Blossoms Day Nursery</li> </ul>
<p>Outline of consultation carried out with school/college (include evidence of consultation):</p> <p>Pre-application consultation letters and drawings of the proposals were sent to the Manger on 01.09.2023.</p>
<p>Summary of outcome/main issues raised (include copies of main correspondence):</p>

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No response at the making the application.

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

Will the proposed development be on a civil safeguarding area or a defence safeguarding area?	Yes	
Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area or defence safeguarding area been notified?	Yes	
Details of response:  Notice served on 27/10/2023. Any responses received will be forwarded to the LPA.		


**Developer's Notice**

Copy of Developer's Notice enclosed?	<b>Yes</b>	
Date served:	27.10.2023 – Copy of notice, proof of service and delivery.	

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### 3. Proposed Development

The proposed site:

#### **Background**

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

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

Cornerstone are in the process of progressing a suitable replacement site in this area of Northolt for a radio base station. As part of Cornerstone's continued network improvement program, there is a specific requirement for a replacement installation at this location to maintain 3G and provide new 4G and 5G coverage and capacity, ensuring that this area of Northolt maintains access to the latest technologies for VMO2 service provision.


#### **Background**

As part of VMO2's continued network improvement program, there is a specific requirement for a replacement installation in this location. The site is to replace coverage which cannot continue to be provided at the current location at 12/12A Mandeville Road, Northolt, Middlesex, UB5 5BJ due to the operator's inability to upgrade the existing site to provide the latest 4G service and 5G services. The existing site is low rise in nature and the height required to provide 5G services and satisfy stringent guidelines could not be met on the existing rooftop. These basic siting principles are explained in extracts (Image 1A and 1B) below from the Code of Practice set out basic siting principles:

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## Scenario 1.

X

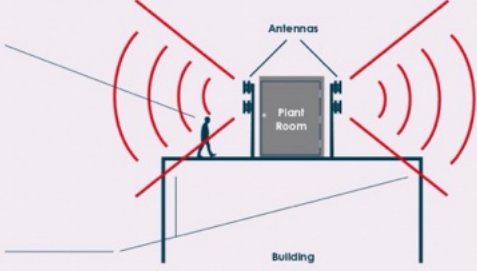
**Antennas are of low elevation and set back from the rooftop edge.**

The International Commission on Non-Ionizing Radiation Protection (ICNIRP) has developed exposure limits adopted by the UK Government. All mobile network operator installations are designed to comply with the ICNIRP exposure limits as adopted in European Union directives and UK legislation.

This scenario might be considered the most visually sympathetic solution as antennas are both set back from the rooftop edge and are of lower elevation. However, the below example is not an ICNIRP compliant design, and therefore would not be proposed.

The person shown is within the exclusion zone – this is not ICNIRP compliant, as the antennas are too low.

With the antennas positioned here "clipping" occurs. This is when the radio frequency signal propagation from an antenna 'clips' the building edge and would result in exclusion zones over sections of the rooftop. This will impact radio performance and service provision to the point that the solution is not viable.




Each Scenario is indicative and a simplified version to demonstrate the technical constraints and solutions. Although 2D was used for simplicity, antennas must be carefully sited at locations on a building to provide 360 degree coverage, and must always be ICNIRP compliant.

Image 1A: Code of Practice set out basic siting principles

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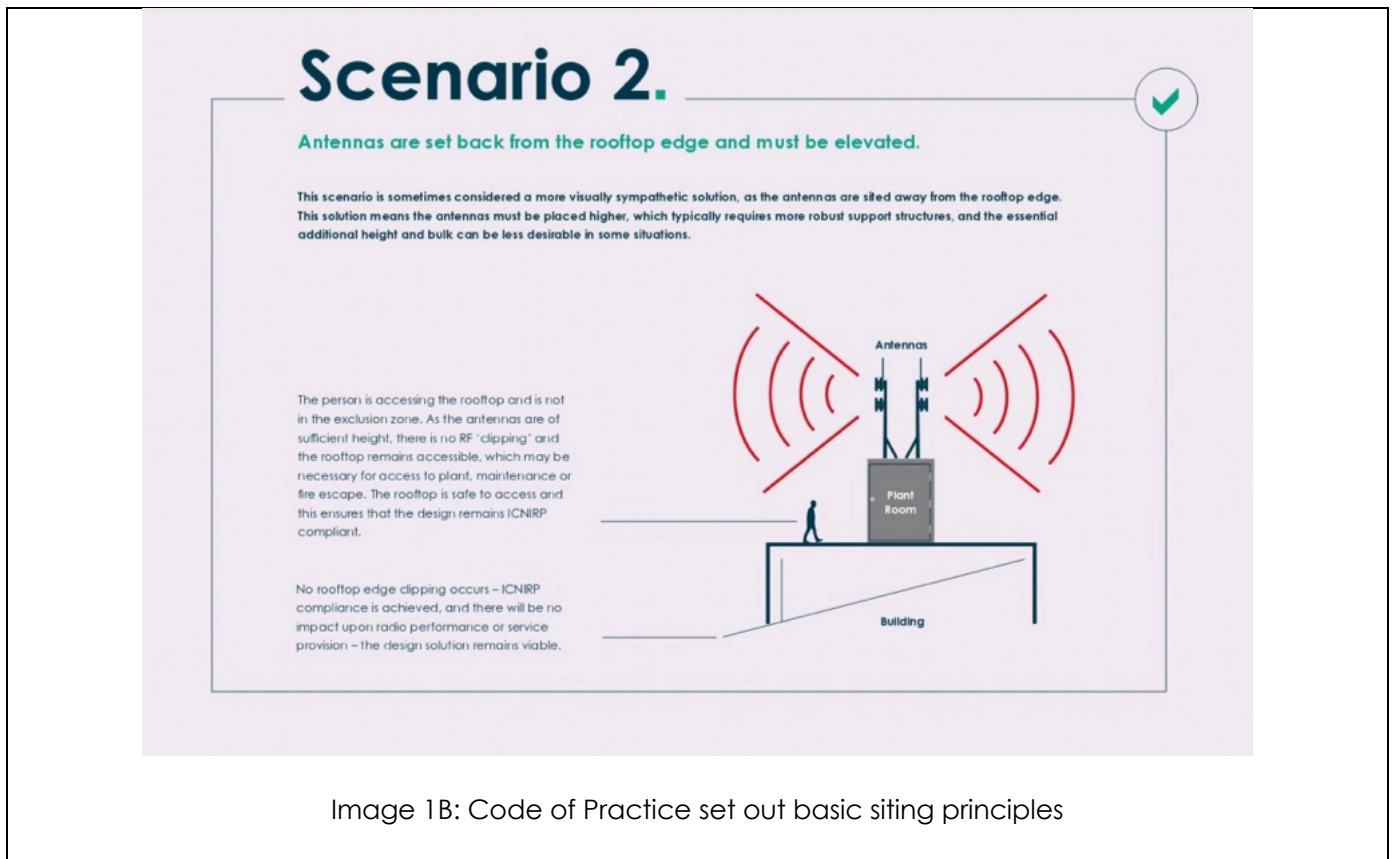


Image 1B: Code of Practice set out basic siting principles

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Image 1c: The Existing Site

As such, Cornerstone needs to find a replacement site for the operator to ensure existing connectivity is not lost to the surrounding businesses, residents and transport routes in this area of Northolt.

Cornerstone is limited in siting options as there is a requirement to provide equivalent replacement coverage and capacity for this area of Northolt. The replacement of an existing site means that the operator has to be located as close as possible to the existing installation in order to fit in with the surrounding network and to maintain the provision of equivalent coverage and capacity to the surrounding local area.

Policy SI.6 of the London Plan 2021 relates to 'Digital connectivity infrastructure' and provides under A.3 that:


*3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation*

It is clear that without this replacement site there will be a reduction in mobile connectivity in surrounding areas as the operator cannot provide enhanced 4G or new 5G services. This is contrary to the Mayor of London's vision that 'London should a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas'.

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### The Site

The surrounding area is mixed use in character with 'The Crown' Public House being located immediately to the north and Northolt Village Community Centre being located to the south of Church Road. The area to the west is residential in character. Mature trees some 18.5m in height form the boundary between Church Road and the application site.



Image d: The Application Site

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Image 2: Birdseye View of the Application Site (Source: Grid Reference Finder)

The operator is limited in siting options as there is a requirement to provide replacement coverage and capacity for this area of Northolt covering the wider commercial area to the west.

The site is located within the Northolt Village Green Conservation Area. However, Section 5 demonstrates that there are no viable alternative sites outside of the Conservation Area.

As 5G is to deliver new technology, so too the infrastructure required is different than that necessary to provide the previous generations of connectivity. Wherever possible, existing installations will be utilised to accommodate the necessary infrastructure. Due to the beamforming technology required for 5G service, the antenna height in many cases must be greater than that for previous generation technology.


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

The operator is seeking to provide replacement coverage to maintain existing 3G services and to enable enhanced 4G as well as new 5G coverage and capacity to the surrounding area services for VMO2 to ensure high quality customer experience is maintained as demands on the network increase and technologies change. This is in line with Policy SI 6 of the London Plan.

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

Type of Structure: Lattice	
Description:	
The proposed installation of 20m lattice tower, supporting 6 no antennas, 2 no dishes, together with 3 no cabinets, 1 no meter cabinet and ancillary development thereto including compound fencing.	
Overall Height:	20.0 meters
Height of existing building (where applicable):	N/A
Equipment Housing: 1 x Eltek Cabinet	
Length:	700mm
Width:	831mm
Height:	2068mm
Equipment Housing: 2 x Racks	
Length:	750mm
Width:	600mm
Height:	1800mm
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel – Galvanised
Equipment housing – type of material and external colour:	Steel – Green – RAL6009

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


It is important that any design solution meets technical requirements in the most environmentally sensitive way. One of the main thrusts of 'Supporting High Quality Infrastructure' in the NPPF is a reduction in the proliferation of telecommunications sites. The guidance states operators **“should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.”** We confirm that the applicant has adopted a sequential approach to site selection, however no existing base stations or structures were suitable, available and deliverable as detailed in Section 5. The design of the proposed equipment is considered to be the least visually intrusive option available given the level of equipment required for 5G (see additional supporting statement – 5G Explanatory Note).

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

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

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

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

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

The proposal is for the proposed installation of 20m lattice tower, supporting 6 no antennas, 2 no dishes, together with 3 no cabinets, 1 no meter cabinet and ancillary development thereto including compound fencing.

A lattice tower design is required to be able to structurally support all the operators equipment at a height of 20m above ground level especially when taking wind loading into account. Monopoles are not able to support the operators equipment at this required height.

Due to the slim line nature of the supporting struts of the lattice frame, light is able to continue to pass through the structure. If the lattice tower were to be any slimmer in width then it would not be structurally capable of supporting all the operators equipment or meet the windloading requirements in this location/ Exposed antennas have been designed in this location as it is the most efficient way of providing coverage to the target coverage area. The antennas could also be upgraded in the future without significant design changes, whilst maintaining quality telecommunications in this area both now and in the future. If the antennas were shrouded, they would not provide such a good coverage. It is also likely that radical design changes would need to be made in the future in line with changes in technology and consumer demand.


The antennas are required to have a top height of 20.00m in order to clear the adjacent trees and clutter and preventing 'clipping' and to ensure that ICNIRP guidelines are met. Any lower and the antennas would be able to clear the surrounding urban clutter and maintain existing services whilst also providing the necessary new coverage into the target coverage area in and around this area of Northolt If the antennas were to be any lower in height then the operator's antennas would clip the urban clutter and not provide the required levels of new coverage. As such, an additional base station would be required in this cell area. This would lead to a proliferation of masts, contrary to national guidance.

The siting of the radio base station is to be positioned adjacent to mature trees (circa 18.50m in height) where a telecommunications installation would not appear out of place. The lattice mast and cabinets are to be galvanised and grey in order to further assimilate into the surrounding environment. They are small for telecommunications apparatus. The cabinets can be installed under the operators permitted development rights, but have been included on the plans and in the description in order to remain fully

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transparent. The equipment will be located in a secure compound formed by a 2.10m high palisade fence.

It is therefore considered that the proposal before you strike a good balance between environmental impact, impact on heritage assets and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site. Taking all matters into account it is considered that this proposal to maintain existing services whilst delivering new 5G services would not appear out of place within the application site or wider streetscene.

### Technical Information

#### Health and Safety - including ICNIRP compliance


An ICNIRP certificate is provided as part of this application.

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)	Yes	No
<p>International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.</p> <p>When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, VMO2 operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p> <p>As part of VMO2's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air</p>		

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<p>traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.</p> <p>The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.</p>		
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#### 4. Technical Justification

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


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

<p>A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.</p> <p>The National Planning Policy Framework states that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt as set out below the proposed replacement installation is needed for Cornerstone to maintain existing 3G/4G coverage and capacity (which otherwise would be lost from the network the network when 144059, 12/12A Mandeville Road is removed) whilst also providing new 5G services to this area of Northolt.</p> <p>The area within which a replacement installation needs to be established in order to meet the coverage requirement is constrained by the location and extent of the coverage provided by existing installations in the surrounding area.</p>
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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)


Discounted Options	Site Type	NGR	Address and Site name	Reason for discounted Option
NTQ Site	Existing Telecom Site	E512948 N184179	12/12A Mandeville Road, Northolt, Middlesex, UB5 5BJ	This is the existing site which cannot be upgraded to order to accommodate 5G communications infrastructure due to the height required to satisfy ICNIRP guidelines. The site is not in the Northolt Village Green Conservation Area.
Discounted Option D1	Greenfield	E513078 N184017	Land outside 3 Ealing Road, Ealing Road, Northolt, London, UB5 6AD	The pavement width here would not be wide enough for an installation and it was therefore discounted for safety reasons. The site is not in the Northolt Village Green Conservation Area.
Discounted Option D2	Rooftop	E513004 N184234	2A - 20 Mandeville Road, Northolt, Middlesex, UB5 5BJ	The rooftop is too low for 5G communications infrastructure due to the height required to satisfy ICNIRP guidelines. The site is not in the Northolt Village Green Conservation Area.
Discounted Option D3	Greenfield	E512896 N184146	32 – 58 Church Road, Northolt, UB5 5AB	The rooftop of 32 – 58 Church Road, is of pitched roof construction which is unsuitable for the siting of telecoms equipment. The applicant is only able to utilise flat concrete roofs that have the capacity to support other plant eg Air Handling Units. The applicants are not able to fix equipment to other types of roofs. The majority of the time the applicants need to fix to a solid support structure that can support the antenna loads in all directions such as a gable wall that has lateral support along the length of the roof. Notably, roof trusses are not considered suitable structures. The site is not in the Northolt Village Green Conservation Area.

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Discounted Option D4	Greenfield	E513088 N184285	Corner of Mandeville Road and Eastcote Lane, Eastcote Lane, Northolt, London, UB5 5RE	A site in this location would not be suitable due to highway safety concerns. The site is not in the Northolt Village Green Conservation Area.
Discounted Option D5	Greenfield (GF)	E513120 N184150	Ealing Road SW, Ealing Road, Northolt, London, UB5 6AA	A site in this location would not be suitable due to highway safety concerns. The site is not in the Northolt Village Green Conservation Area.
Discounted Option D6	Greenfield (GF)	E513135 N184172	4-5 Ealing Road SW, Ealing Road, Northolt, London, UB5 5HT	A site in this location would not be suitable due to highway safety concerns. The site is not in the Northolt Village Green Conservation Area.
Discounted Option D7	Greenfield (GF)	E513051 N184284	Mandeville Road SW, Mandeville Road, Northolt, London, UB5 5BH	A site in this location would not be suitable due to highway safety concerns. The site is not in the Northolt Village Green Conservation Area.
Discounted Option D8	Rooftop (RT)	E512976 N184206	Sham House, 22-24 Mandeville Road, Northolt UB5 5BL	The rooftop of Sham House, is of pitched roof construction which is unsuitable for the siting of telecoms equipment. The applicant is only able to utilise flat concrete roofs that have the capacity to support other plant eg Air Handling Units. The applicants are not able to fix equipment to other types of roofs. The majority of the time the applicants need to fix to a solid support structure that can support the antenna loads in all directions such as a gable wall that has lateral support along the length of the roof. Notably, roof trusses are not considered suitable structures. The site is not in the Northolt Village Green Conservation Area.
Discounted Option D9	Greenfield (GF)	E513011 N184253	BP Petrol Filling Station, Mandeville Road, Northolt UB5 5BH	Locating the new column and cabinets in the car park of the BP petrol filling station would detrimentally affect the daily operations of the garage. As such, this location has been discounted. The site is not in the Northolt Village Green Conservation Area.

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Discounted Option D10	Rooftop (RT)	E513065 N184329	Northolt Post Office, 46 Mandeville Road, Northolt UB5 5AA	The rooftop is too low for 5G communications infrastructure due to the height required to satisfy ICNIRP guidelines. The site is not in the Northolt Village Green Conservation Area.
Discounted Option 11	Rooftop (RT)	E513040 N184200	Saint Bernard's Roman Catholic Church Northolt, UB5 5BJ	Due to the construction of the building there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area. The site is not in the Northolt Village Green Conservation Area.
Discounted Option 12	Rooftop (RT)	E513017 N184184	Goddard Veterinary Group, Mandeville Hospital, 15 Mandeville Rd, Northolt UB5 5HD	Due to the construction of the building there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area. The site is not in the Northolt Village Green Conservation Area.
Discounted Option 13	Rooftop (RT)	E513123 N184294	Sainsbury's Local, 35 Mandeville Rd, Northolt UB5 5HF	Due to the construction of the building there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area. The site is not in the Northolt Village Green Conservation Area.

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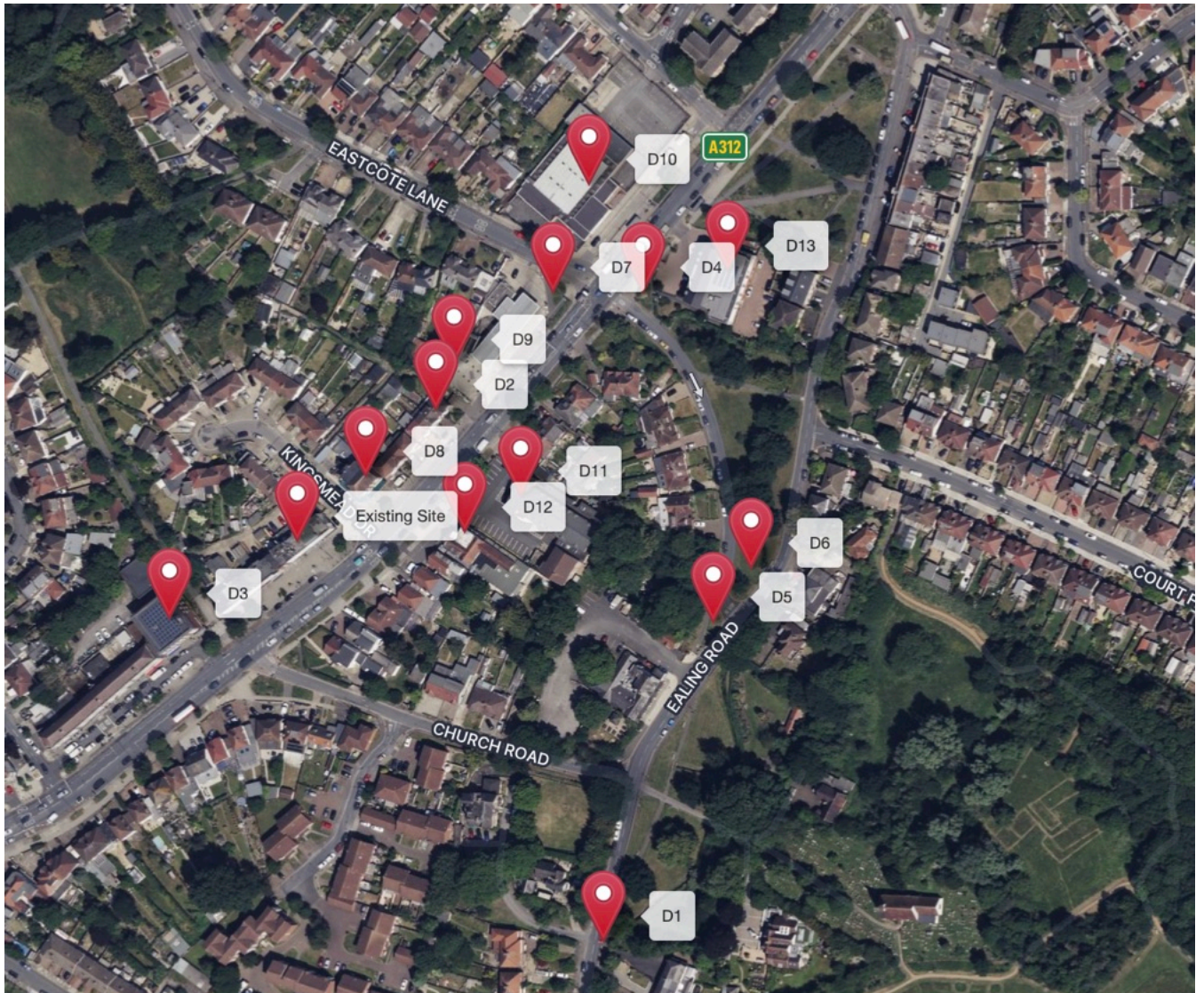


Image 3 Map of Discounted Sites

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

N/A

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

No specific environmental considerations identified to date.


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

The site is located within the Northolt Village Green Conservation Area.

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

### **National Planning Guidance**

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

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

### **National Planning Policy Framework (September 2023)**

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. In July 2021 the NPPF was revised again. Overall, it's been revised to strengthen other sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statuses and opting out of PD rights relating to residential conversions. The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 114 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of *reliable* communications infrastructure for both economic growth *and social well-being*.

The NPPF continues to support the expansion of electronic communications networks at paragraph 114. It notes that policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF makes reference to 5G:

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

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

Paragraph 115 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.


Paragraph 118 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining applications on planning grounds only. They should not seek to prevent

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competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out- of-date, granting permission unless the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

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

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

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 81 states:

*'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation<sup>42</sup>'...*

Footnote 42 of the NPPF states:

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

The NPPF provides guidance on proposals affecting heritage assets. Paragraph 194 states that 'in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. 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.

Paragraph 195 goes on to state that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset).


The NPPF goes on to provide guidance on considering the potential impacts of development on heritage assets. Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's

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conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 202 retains advice provided in the 2012 version of NPPF relating to the degree of harm. It states 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.

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

### **Code of Practice for Wireless Network Development in England.**

The Code of Practice provides guidance to Code Operators (referred to as 'operators' throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The aim of the Code of Practice is to support the government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

The Code of Practice covers all forms of wireless infrastructure development, including mobile masts and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Best Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

The CoP sets out the legal and policy framework for the delivery of wireless infrastructure development.

Paragraph 8 of the revised Code acknowledges that connectivity is vital to enable people to stay connected and that fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code continues to acknowledge that as the demand for mobile data in the United Kingdom is increasing rapidly, and that it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.


The Government recognises the role of Planning in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity.

Paragraph 13 of the Code continues to echo the NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth. More specifically that planning policies and decisions should support the expansion of electronic

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communications networks, including next generation mobile technologies (such as 5G) in order to support economic growth across the country.

The CoP sets out 'How wireless networks function.

Para.16. states "Cellular wireless networks use base stations to provide an area of radio coverage. Wireless technology uses the radio spectrum to broadcast radio waves between base stations and devices. Different radio frequencies have different characteristics which, along with the density of cell site locations, affect the extent of coverage and how much data can be carried over the network. Depending on the radio frequencies used, base stations can deliver coverage over a wide area or provide extra network capacity in areas where there is a high demand for network bandwidth".

Para. 17 sets out that "Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications".

The CoP establishes 'Principles and commitments' by which operators should develop their networks and that Local Planning Authorities should demonstrate their support by.


Para. 18 states "Operators should develop their networks and install wireless infrastructure according to the following principles and commitments:

- **Site sharing and use of existing infrastructure:** make use of existing structures, sites and masts wherever possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and sites 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.
- **Consultation with local planning authorities, local communities and other stakeholders:** participate in dialogue with local planning authorities, along with other relevant stakeholders such as the highways authorities, Area of Outstanding Natural Beauty bodies, Historic England, and Natural England, including pre-application discussions, where appropriate. Maintain clear procedures, and high quality communication and consultation with local communities and other interested parties. Operators should agree community engagement with local planning authorities and share information as appropriate (see Pre-application consultation with local communities below).
- **Standardised and high-quality approach to planning applications, and the notification procedure:** provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements. Ensure planning submissions are of high-quality and provide the necessary evidence to support the application (as per the NPPF).
- **Prompt responses to enquiries:** respond to complaints and enquiries within a timely manner (see Review and Enquiries section below).
- **Siting and Design:** wireless infrastructure should be deployed in accordance with the guidance set out within this Code of Practice. Where appropriate, equipment should

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comply with the principles set out in the NPPF and consider any local planning policies, including any local and national design codes. When located in protected landscapes and other designated land, the sensitive nature of these areas must be considered.

- **Removal of redundant equipment and site restoration:** ensure that when infrastructure is upgraded, any equipment that is made redundant by the upgrade, such as brackets, is removed to benefit the local environment. Where a whole site is no longer in use, the site should be restored to its original state.
- **Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure levels guidance:** as required by spectrum licences, comply with international guidelines for limiting exposure to electromagnetic fields (EMF) - including, as set out in the NPPF, providing a statement that self-certifies that ICNIRP guidelines will be met with all applications (see [Annex C](#)).

Paragraph 19 states that Local Planning Authorities should demonstrate their support by:

- **"Incentivising connectivity:** support the expansion of telecommunications networks and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.
- **Facilitating sites:** engage with operators when new sites have been proposed and discuss site requirements.
- **Engagement with operators:** respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.
- **Information and communication:** ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives)".

The added emphasis on support from Local Planning Authorities in the deployment in digital infrastructure is even more evident in the revised CoP. The CoP recognises the importance of collaboration and partnership to help drive network coverage across the country. It goes on to state that 'In all instances, it is important for all parties involved in the process to take a positive approach to consultation and engagement'.

### Siting and Design Principles


The government's objective is to deliver high quality, reliable wireless infrastructure whilst ensuring the impact of new network development is kept to a minimum. The siting and design of wireless network infrastructure is central to achieving this. The CoP acknowledges that 'good siting and design principles should apply to all wireless network development and take into account any site-specific considerations and context. Both can create better places in which to live and work and help make development acceptable to communities'.

The Code provides guidance on siting and appearance principles. It sets out several design principles in respect of telecommunications development and acknowledges that the options for design used by an operator will be affected by site conditions including requirements to link the site to the network, landscape features and coverage and capacity requirements. The guidance includes at Para. 22 'the choice over the site selection and design of equipment is primarily dependent upon the coverage

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*and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible'.*

Para. 23 confirms that there should be a **'presumption in favour of facilitating sustainable network development'** and, as such, operators and local planning authorities, as well as all other bodies involved in the deployment process, should work together to ensure connectivity needs are met and find viable solutions to deployment issues (emphasis added).

Paragraphs 24 - 27 sets out general siting and site selection principles which Operators should consider. The CoP acknowledges at Para. 24 that *'Operators use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 3G, 4G and now 5G. Once an operator has identified a requirement for a new cell site, a suitable site needs to be found. Elements that make a site favourable include: having existing or ready access to a power supply, access to fibre optic cables, vehicular access, and, other buildings and development which may provide a level of existing screening. Operators will typically look to upgrade existing infrastructure prior to considering a new deployment, in particular for initial 5G deployment'*.

Para 25 notes that *'When selecting sites for mobile infrastructure, operators should examine local plans and designations for the area, as well as carrying out an in-person site search to identify potential options which meet their requirements. Operators should follow these general siting and site selection principles:*

- *Installation on existing buildings and structures;*
- *Erecting new ground based masts;*
- *Camouflaging or disguising equipment where appropriate;*
- *Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage); and*
- *Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator)'.*

Para. 26 highlights that the installation of all wireless infrastructure requires a balanced approach between the technical needs and constraints of the proposed site and the potential impact of the development. The three key technical and operational considerations for installation sites are:


- **Coverage:** wireless infrastructure needs to provide an appropriate level of coverage over the intended geographical area. This involves ensuring that antennas are elevated sufficiently (often via masts) to provide clear lines of sight for signals.
- **Capacity:** where existing network infrastructure can no longer meet the demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand. This is more likely to be required in densely populated areas or areas of high footfall.
- **Backhaul:** the radio access network requires a connection to the core network. Backhaul is sometimes provided by a microwave link, which requires a clear line of sight between the two ends of the link.

Para 27 requires that Local Planning Authorities consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. Para. 27 further considers that in general, it should not, therefore, be appropriate for planning authorities to seek wider

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evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations

In respect of 'Design', the CoP at Para 28 acknowledges that the siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact including

- Protecting visual amenity
- Mitigating visual impacts

Para. 29 acknowledges that these factors along with location and the coverage and capacity requirements can influence the type of infrastructure structure that is deployed and requires that '*planning authorities should be aware of these constraints when considering proposals. In particular:*

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.*
- *In rural areas, base stations often need to cover wider geographic areas. Operators may need to use tall masts or lattice towers to provide the required coverage. The location of masts can sometimes be dictated by access to transmission links back to the operator's main network and proximity to a power supply. Coverage in some areas can be limited because of the geography, topography and terrain'.*

The CoP establishes radio equipment housing (cabinets) principles. The CoP at Para. 30 states that "*cabinets protect radio transmitters and receivers, provide the power source for mobile equipment, and are connected to antennas via cables. Equipment cabinets are likely to be needed at most sites. The cabinets must be of sufficient size to facilitate hosting various operating equipment whilst also allowing air circulation to reduce the potential for overheating*". The CoP establishes the planning and visual considerations for siting radio housing. These include:

- Colouring
- Siting on highways and footways:
- Highway safety:
- Listed buildings/ scheduled monuments and Conservation Areas:
- Access
- Trees

The growth of digital connectivity over the last few decades has transformed all aspects of life within the UK. It has provided the opportunity to work differently, to socialise and interact differently, to bring the world closer and to offer new commercial opportunities. The internet and mobile connectivity rely upon the deployment of new fibre networks. Utilising these fibre networks allows each mobile base station to link back into the wider core network, however, the requirements in the future are for ubiquitous coverage and this will mean the more complex, more remote locations throughout the country will need further new installations. In addition, 5G offers download speeds far in excess of what can be achieved today, even by fixed line broadband. Such increased speeds and low latency provides the potential for far greater opportunities.


### **Levelling Up the United Kingdom White Paper**

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The Department for Levelling Up, Housing and Communities (DLUHC) published the 'Levelling Up the United Kingdom White Paper' on 02 February 2022. Levelling up is a moral, social and economic programme for the whole of government. The Levelling Up White Paper sets out how the Government spread opportunity more equally across the UK.

The 'Levelling Up the United Kingdom White Paper' champions that

*'the United Kingdom is an unparalleled success story – a multi-cultural, multi-national, multi-ethnic state with the world's best broadcaster; a vibrantly creative arts sector; a National Health Service which guarantees care for every citizen; charities and voluntary groups which perform a million acts of kindness daily; globally renowned scientists extending the boundaries of knowledge every year; entrepreneurs developing the products and services which bring joy and jobs to so many; and millions of citizens whose kindness and compassion has been so powerfully displayed during the COVID-19 pandemic.*

*But not everyone shares equally in the UK's success. While talent is spread equally across our country, opportunity is not. Levelling up is a mission to challenge, and change, that unfairness. Levelling up means giving everyone the opportunity to flourish. It means people everywhere living longer and more fulfilling lives, and benefitting from sustained rises in living standards and well-being.*

*This requires us to end the geographical inequality which is such a striking feature of the UK. It needs to begin by improving economic dynamism and innovation to drive growth across the whole country, unleashing the power of the private sector to unlock jobs and opportunity for all. While there are world-leading and enterprising businesses and innovators right across the UK, economic growth and the higher productivity which drives it has been over-concentrated in specific areas, particularly the South East of England. A long tail of low-productivity businesses and places explain why UK productivity growth is too low compared to competitors. It is vital that we preserve and enhance the economic, academic and cultural success stories of the UK's most productive counties, towns and cities. But it is equally critical that we improve productivity, boost economic growth, encourage innovation, create good jobs, enhance educational attainment and renovate the social and cultural fabric of those parts of the UK that have stalled and not – so far – shared equally in our nation's success'.*

The 'Levelling Up the United Kingdom White Paper' states that:


*'The UK Government has made progress towards spreading opportunity around the country since 2019, alongside mitigating the worst effects of the pandemic, with: • £5bn for Project Gigabit to bring gigabit-capable broadband to 85% of the UK by 2025, and the £1bn Shared Rural Network deal with mobile operators delivering 4G coverage to 95% of the UK by the end of 2025; • five-year consolidated transport settlements amounting to £5.7bn in eight city regions outside London, £5bn of funding for buses and active travel over this Parliament; and £96bn for the Integrated Rail Plan delivering faster, more frequent and more reliable journeys across the North of England and the Midlands;*

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Levelling up is not about making every part of the UK the same or pitting one part of the country against another. Nor does it mean dampening down the success of more prosperous areas. Indeed, by extending opportunity across the UK we can relieve pressures on public services, housing and green fields in the South East. And levelling up can improve well-being in the South East by improving productivity in the North and Midlands. So, it is about the success of the whole country: realising the potential of every place and every person across the UK, building on their unique strengths, spreading opportunities for individuals and businesses, and celebrating every single city, town and village's culture. This will make the economy stronger, more equal and more resilient, and lengthen and improve people's lives. The economic prize from levelling up is potentially enormous. If underperforming places were levelled up towards the UK average, unlocking their potential, this could boost aggregate UK GDP by tens of billions of pounds each year. Levelling up skills, health, education and wellbeing would deliver similarly-sized benefits. Accumulated over time, those gains could easily surpass annual UK GDP. Success in levelling up is about growing the economic pie, everywhere and for everyone, not re-slicing it.


*The United Kingdom's Geographical Disparities: Drivers and Potential Policy Approaches* What does the economic and social geography of the United Kingdom look like? The UK has larger geographical differences than many other developed countries on multiple measures, including productivity, pay, educational attainment and health. Urban areas and coastal towns suffer disproportionately from crime, while places with particularly high levels of deprivation, such as former mining communities, outlying urban estates and seaside towns have the highest levels of community need and poor opportunities for the people who grow up there. These disparities are often larger within towns, counties or regions than between them. They are hyper-local and pockets of affluence and deprivation may exist in the same district. Indeed, many of the worst areas of deprivation are found in the UK's most successful cities. While change is possible, in some cases, these differences have persisted for much of the last century. And some of the UK's most successful cities – such as Birmingham, Manchester, Leeds, Glasgow and Cardiff – lag behind their international comparators when it comes to productivity and incomes. What are the current and future drivers of geographical disparities? Over the past century, many trends have combined to create the spatial patterns seen across the UK today. Globalisation, technological progress, advances in transport, logistics and power, and the shift from heavy industry to knowledge-intensive sectors, as well as the rise of foreign holidays and shift from technical training to university education, have had a large and lasting impact on the economic geography of the UK. These dynamics of the global economy have benefited the UK overall, improving productivity, increasing wealth and driving up living standards through more innovation and competition. These dynamics, however, have not had the same positive economic and social impacts across the UK. While London and much of the South East have benefited economically, former industrial centres and many coastal communities have suffered. This has left deep and lasting scars in many of these places, damaging skills, jobs, innovation, pride in place, health and wellbeing. What are the factors that will help drive levelling up? Levelling up requires a focused, long-term plan of action and a clear framework to identify and act upon the drivers of spatial disparity. Evidence from a range of disciplines tells us these drivers can be encapsulated in six “capitals”.

- Physical capital – infrastructure, machines and housing.
- Human capital – the skills, health and experience of the workforce.
- Intangible capital – innovation, ideas and patents.

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- Financial capital – resources supporting the financing of companies.
- Social capital – the strength of communities, relationships and trust.
- Institutional capital – local leadership, capacity and capability

This White Paper sets out that the new policy regime is based on five mutually reinforcing pillars. Firstly, the UK Government is setting clear and ambitious medium-term missions to provide consistency and clarity over levelling up policy objectives. These missions will serve as an anchor for policy across government, as well as catalysing innovation and action by the private and civil society sectors. These missions are ambitions that the UK Government has for all parts of the UK. Delivering on them, while being fully respectful of the devolution settlements, will require close and collaborative work with the devolved administrations. The missions are rolling decade-long endeavours and will be reviewed periodically by the UK Government. One mission relates to:

**“Digital Connectivity**

**Mission: By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population” (my emphasis.**

The White Paper notes the pivotal role that ‘Digital Connectivity’ has in boosting productivity, pay, jobs, and living standards by ‘Growing the Private Sector’.

To help drive these improvements, the UK Government is setting four core missions, spanning living standards; research and development (R&D); transport infrastructure; and digital connectivity.

Para. 3.2.4 of the White Paper states ‘By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population. This mission is focused on improving digital connectivity’.

The case for ‘Digital Connectivity’ action states:

*‘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. However, there are significant spatial disparities in the quality of broadband and mobile networks, with rural areas likely to experience worse digital connectivity than urban areas. Infrastructure is only part of the picture: economic benefits will only materialise if businesses and workers have the skills to take advantage of improved infrastructure.*

*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. Existing specialisms in the UK regions have the potential to generate strong tech clusters, such as fintech in Scotland and Wales, e-Commerce in the North West and Northern Ireland, and Agri-Tech in Yorkshire and the Humber. The sector also provides opportunities for raising living standards – median earnings for the sector are 50% higher than the UK average.*


The policy programme for ‘Digital Connectivity’ states:

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*'In 2020, the UK Government published the National Infrastructure Strategy, committing to providing £5bn in public funding to roll out gigabit broadband to at least 85% of the country by 2025, and subsequently to as close to 100% as possible, working with the private sector. Public investment will target premises that are hardest to reach and which would otherwise not be provided for by the private sector, ensuring no areas are left behind. Gigabit coverage has increased from 10% to over 60% in less than two years. Since 2019, coverage has improved across the UK, and the UK Government anticipates the following additional improvements to be delivered as a minimum by 2025.*

*The UK Government has also agreed a £1bn deal with mobile operators to deliver the Shared Rural Network programme. This will see operators collectively increase 4G coverage to 95% by 2025. As a result of this collaboration, the vast majority of the UK will soon benefit from improvements to digital connectivity.*

**5G has the potential to radically change the way people live and make businesses more productive and competitive.** *The UK Government's ambition is for the majority of the population to have access to a 5G signal by 2027. Since 2017, the UK Government has provided £200m in funding for 5G Testbeds and Trials, supporting over 200 startups and SMEs across a range of sectors – including healthcare, manufacturing, Agri-Tech and creative industries – to better understand how to use the technology to develop new solutions and services (emphasis added).*

*In 2022, the UK Government will publish the Wireless Infrastructure Strategy. This will review how far the private sector will go to deliver wireless infrastructure – including 5G – across the country, and determine whether there are any market failures in places that need to be addressed, and how the UK Government could tackle these.*

*The West Midlands 5G (WM5G) Testbed started in 2018 with the mission of testing and proving the benefits of 5G to public and private sector productivity, creating jobs and boosting growth. The UK Government has invested £21m over three years, alongside investment from local government and the private sector. By working with local authorities and Mobile Network Operators (MNOs), WM5G has accelerated 5G deployment by over six months, resulting in the West Midlands being amongst the best connected places for 5G in the UK. In addition, WM5G has delivered a number of UK firsts, including a 5G road sensor network, 5G connected ambulance and capsule endoscopy trials, and a 5G application accelerator programme called 5prinG, which has already upskilled over 400 organisations on the benefits of 5G and allowed over 60 startups to develop new 5G products and services. We must ensure that people have sufficient digital skills to reap the benefits and prosperity arising from the digital economy. In 2020, the UK Government introduced a new digital skills entitlement, giving adults with low or no digital skills in England free access to new digital skills qualifications based on employer-supported national standards. The UK Government continues to work with local leaders to develop Local Digital Skills Partnerships. These collaborative partnerships are now operating in seven regions across England, with an eighth formally launching in Hull and East Yorkshire in early March. The UK Government will work with*

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*devolved administrations to consider how best to share the insights and evaluation of the programme to help build digital skills capability across the UK'.*

The current proposals for a replacement base station will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place. Maximising access and maintaining choice in telecommunications should help people to maintain and enhance economic, social and civic connections. Universal accessibility to telecommunications is vital to help overcome isolation or exclusion of urban life. Accelerating the extension of new communications modes should help to avoid new pockets of exclusion developing.

Further to the Government's commitment to improve digital connectivity, on 04<sup>th</sup> April 2022 the new permitted development rights for telecommunication operators came into force (SI 2022 No.278). The Explanatory Memorandum to the Town and Country Planning (General Permitted Development) (England)(Amendment) Order 2022 confirms that '*permitted development rights have an important role to play in the planning system. They provide a more streamlined planning process with greater planning certainty, while at the same time allowing the local consideration of key planning matters through a light-touch prior approval process*'.

### **Planning for the Future'<sup>2</sup>White Paper**

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

Planning is expected to play a key role in United Kingdom's economic and social recovery from COVID-19. The MHCLG published the 'Planning for the Future'<sup>3</sup> White Paper on 06<sup>th</sup> August 2020. The consultation notes that the '*outbreak of COVID-19 has affected the economic and social lives of the entire nation*'. The consultation proposes reforms of the planning system to streamline and modernise the planning process, bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development where it is needed.

It is noted that much of the proposed streamlining and modernisation will be based on greater use of digital technology. Without the relevant infrastructure in place such as the appeal proposal this will not be possible.

In order to assist with social and economic recovery, the MHCLG have through the White Paper revitalised the presumption in favour of sustainable development. This will give greater weight to the contribution that development makes to meeting the country's social, environmental and economic objectives. The appeal proposals meet all three objectives of sustainable development identified in Paragraph 8 of the NPPF as well as the 'Sustainability Test' set out in the White Paper.

This clearly further demonstrates the Government's perspective that mobile communications infrastructure is critical infrastructure and needs to be fully operational to respond to COVID-19 and to contribute to achieving social, environmental and particularly economic objectives. The proposed

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<sup>2</sup> <https://www.gov.uk/government/consultations/planning-for-the-future>

<sup>3</sup> <https://www.gov.uk/government/consultations/planning-for-the-future>

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installation corresponds with the priorities identified by Government as part of an effective response in dealing with COVID-19 and ensuring sustainable development.

### **UK Wireless Infrastructure Strategy, April 2023**

In April 2023, the UK Government published the 'UK Wireless Infrastructure Strategy'<sup>1</sup>, a plan for delivering world-class digital infrastructure which the government identifies as an essential enabler for its 5 priorities of building a better, more secure, more prosperous future for the UK, including growing the economy, and creating better-paid jobs and opportunity right across the country. In her foreword, the Rt Hon Michelle Donelan MP, Secretary of State for Department for Science, Innovation and Technology, provides context for the strategy:

*"5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone **5G will drive growth** in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. **5G can improve our public services**, too, in everything from education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis.... This is an incredible opportunity; widespread adoption of **5G could see £159 billion in productivity** benefits by 2035".*

The Future Telecoms Infrastructure Review, 2018 out the ambition of the Government for the UK to become a world leader in 5G technology and ensuring world class connectivity for all. This ambition was reaffirmed in the 'UK Wireless Infrastructure Strategy', published in April 2023 which states in the Executive Summary:

*"The next decade will see seismic changes both in terms of what wireless connectivity can deliver and how we can use it. The economic and social benefits from these changes promise to be vast, from supercharging growth to accelerating our transition to net zero. But these benefits can only be achieved with concerted action from government, industry, and others".*

The Foreword of the 'UK Wireless Infrastructure Strategy' by Julia Lopez MP 'Minister of State for Department for Science, Innovation and Technology' states inter-alia:

*"The more our lives are conducted online, the more access to the internet becomes critical for social and economic opportunity.*

*This is why delivering world-class digital infrastructure to all Britons is a fundamental mission of this government - and our efforts to build it the modern equivalent in scale and ambition to the Victorians' construction of the railways. Our plan is for every corner of our country to get lightning fast connectivity, not only to give people real choices about where to live and work today but so they will not be left out of future technological revolutions because of poor infrastructure.*


*It is this sense of purpose that underpins Project Gigabit, our flagship £5 billion programme to reach hard-to-reach communities across the UK with gigabit-capable broadband. It is complemented by a staggering competition now underway between commercial suppliers to supply Britons with great connectivity.*

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*Extraordinary progress is being made on coverage. When I began my role in September 2021, gigabit coverage was just over 50%. Now, it stands at almost 75%. With £1bn of Project Gigabit's funding now available to suppliers, our contracts are not just delivering better internet but skilled jobs everywhere from Blandford to Berwick. By the end of next year, we hope to have every part of our country under contract.*

*Which is why the time is right to turn our sights to mobile connectivity, where the same sense of mission is needed to deliver the kind of wireless infrastructure that will transform how we live our lives and run our economy. This is not simply a matter of improving download speeds as people browse the internet on their phones or dial into work calls. It is far more transformative than that'.*

The UK Wireless Strategy states that '4G technology revolutionised the way people use their mobile phones. What today is considered normal, a decade ago was ground-breaking. We have seen the growth of streaming services, like Netflix and Spotify, and gained constant access to high-quality, user-produced content for free on platforms like YouTube, transformed the way we shop online, travel around cities through access to apps like Uber and Bolt and use public services, such as booking NHS appointments through apps'.

The UK Government in the UK Wireless Infrastructure Strategy' recognises that 'growth in the digital sector is nearly 6 times faster than across the economy as a whole.

### **Connected Nations Report 2022**

The Connected Nations Report 2022 was published in December 2022. The report confirms in line with the UK Wireless Infrastructure Strategy (April 2023) in respect of delivering a basic 5G signal for the majority of the population by 2027, 5 years early that 5G rollout is expanding, stating:

*"5G rollout is expanding EE, Virgin Media O2, Three and Vodafone have continued to extend their 5G networks across the UK, and we are reporting individual mobile network operator (MNO) coverage for the first time, based on the High to Very High Confidence range which we established in 2021. These ranges cover an increasing probability that the coverage predicted by MNOs will translate into coverage on the ground. As noted above, the level of coverage provided outside of premises by at least one mobile network operator across this range is now at 67-77% (up from 42-57% last year). The coverage provided outside of premises from individual MNOs ranges from 39-58% at High Confidence, with a range of 31-45% at our Very High Confidence level. Though most 5G sites are focused around busy urban areas - providing additional capacity to existing mobile data services - we're now seeing coverage extending into smaller towns and other high footfall locations. The distribution of this investment remains broadly similar to last year, with 86% of sites in England, 8% in Scotland, 4% in Wales and 2% in Northern Ireland".*

### **Connected Nations 2023**

The Connected Nations 2023 was published in May 2023. This is the first interim update to their Connected Nations 2022 report. It is based on mobile coverage and fixed broadband availability across the UK as of January 2023. Ofcom is a measure mobile coverage in a way that reflects the likely experience of people using their mobile phones. The report acknowledges that there has not been a significant increase in coverage since the December 2022, but the industry continues to develop its coverage footprint.


*"4G: Coverage of 4G mobile networks across the UK has not seen significant changes over the last reporting periods. Around 92% of the UK landmass is predicted to have good outdoor 4G coverage*

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from at least one operator, and this area includes nearly all of the premises in the UK. This is expected to rise to 95% by end of 2025 as a result of the SRN.

**4G not-spots:** The UK has both geographic and road not-spots (that is, areas where good 4G services are not available from any mobile operator). Geographic not-spots have remained the same since our December 2022 report at 8%. Road coverage remains largely the same with just 4% of all roads estimated to be an in-vehicle not-spot. This varies significantly across individual nations, particularly in Scotland and also in Wales. Wales has benefited by a percentage point drop in geographic notspots since our December report, which we attribute to the SRN scheme.

**Calls and text coverage:** As with 4G, predicted coverage for calls and text services remains largely unchanged over the previous reporting periods. The range of predicted coverage by MNOs varies from 85-93% of the UK landmass, depending upon operator. In addition, 99% of all UK premises are predicted to have coverage for outdoor voice calls from all MNOs.

**Calls/text not-spots:** Areas where people are unable to make a call or send a text from any operator (not-spots) is similarly unchanged, with around 4% of the UK geography estimated as a not-spot, and around 2% of the UK's roads estimated to be a not-spot for calls and texts made or received in vehicle. As with 4G, there are marked variations for individual nations; for example, geographic notspots across Scotland remain higher than for the rest of the UK, at around 10%.

**5G:** We continue to report on 5G coverage (outdoors premises) from 'All MNOs' and from 'At least one MNO', with coverage confidence levels ranging from high to very high. Coverage from 'At least one MNO' now ranges from 73% (very high confidence) to 82% (high confidence) of premises outdoors, up from 67% and 78% respectively when we reported in our December 2022 report".

### **Online Nation 2022 Report**

The 'Online Nation 2022 Report' produced by Ofcom confirms the following:

- UK adults spend almost 4 hours a day online, 3 hours of which are spent on smartphones. (UK young adults (i.e., 18-24 year olds spend approximately 5 hours online and UK adults aged 55+ spend approximately 3 hours online)
- 73% of time spent online/day by UK adults was via a smartphone
- 1 in 5 people use only a smart phone for online access compared with 1 in 10 in 2020

With regards to increased usage of smartphones only for online access the report suggests:

*"More people are using only a smartphone to go online. People were more likely in 2021 than in 2020 to only use a smartphone to go online (21% vs 11% in 2020)<sup>[2]</sup>. There could be many reasons, but this may be because people were spending more time at home in late 2020 and early 2021 than in late 2021, and therefore used a wider range of devices. It may also reflect the larger screen size and better-optimised app functions of many smartphones, making them easier and potentially more cost-effective to use as a sole device for accessing the internet.*


The Report goes on to states that:

<sup>[2]</sup> Ofcom Adults' Media Literacy Tracker 2021: Core survey IN1. Which of these devices do you use to go online? (single coded)  
Base: All adults aged 16+ who go online at home or elsewhere (excluding those who did not give a response at the postal survey)  
– 3,577

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*"In September 2021 73% of the time spent online by UK online adults per day was on a smartphone. UK online adults are also spending slightly more time using tablets than computers, demonstrating that there is a clear preference for using mobile devices to go online. Those aged 25 to 34 spend the highest proportion (85%) of their online time using a smartphone, followed by 35-44s (80%); 15-24s (78%); 45-54s (74%) and those aged 55+ (55%).<sup>[3]</sup>"*

### **Local Policy**

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

The statutory development plan as defined by the Planning and Compulsory Purchase Act 2004 comprises:

- The London Plan (Adopted 2021)
- Ealing Development Core Strategy DPD (April 2012)
- Ealing Development Management DPD (December 2013)

### **The London Plan 2021**

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

The Foreword of the Plan states:

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

Chapter 1 of the London Plan deals with 'Planning London's Future - Good Growth'. Para.1.0.1 relates to 'Good Growth' that is "socially and economically inclusive and environmentally sustainable and underpins the whole of the London Plan and each policy. It is the way in which sustainable development in London is to be achieved".

Para 1.0.10 is within the Planning for Good Growth section of Chapter 1 and states: *'Planning for a 'smarter' city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners.'*

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


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<sup>[3]</sup> Ipsos, Ipsos iris Online Audience Measurement Service, 1 September–30 September 2021, adults age: 15+, UK. Note: Custom data supplied by Ipsos.

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

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

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

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

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

Policy D4 relates to 'Delivering good design' and states:

*'Design analysis and development certainty*

*A Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design-led approach. B Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.*


*Design scrutiny*

*C Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan. D The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E if they: 1) include a residential component that exceeds 350 units per*

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hectare; or 2) propose a building defined as a tall building by the borough (see Policy D9 Tall buildings), or that is more than 30m in height where there is no local definition of a tall building. E The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that: 1) design reviews are carried out transparently by independent experts in relevant disciplines 2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme 3) where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews 4) design review recommendations are appropriately recorded and communicated to officers and decision makers 5) schemes show how they have considered and addressed the design review recommendations 6) planning decisions demonstrate how design review has been addressed.

#### Maintaining design quality


F The design quality of development should be retained through to completion by: 1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development 2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design 3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter 4) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.

Policy D8 relates to 'Public realm' and states: 'Development Plans and development proposals should: A encourage and explore opportunities to create new public realm where appropriate B ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution C maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive onstreet parking, which can obstruct people's safe enjoyment of the space. This includes design that reduces the impact of traffic noise and encourages appropriate vehicle speeds D be based on an understanding of how the public realm in an area functions and creates a sense of place during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of how people use the public realm, and the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists E ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings, which should be regular, convenient and accessible F ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm G ensure buildings are of a design that activates and defines the public realm, and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm H ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its

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safe management in accordance with the Public London Charter I incorporate green infrastructure such as street trees and other vegetation into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature and increase biodiversity J ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place K ensure that street clutter, including street furniture that is poorly located, unsightly, in poor condition or without a clear function is removed, to ensure that pedestrian amenity is improved. Consideration should be given to the use, design and location of street furniture so that it complements the use and function of the space. Applications which seek to introduce unnecessary street furniture should be refused L explore opportunities for innovative approaches to improving the public realm such as open street events and Play Streets M create an engaging public realm for people of all ages, with opportunities for social activities, formal and informal play and social interaction during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm N ensure that any on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Parking should not obstruct pedestrian lines O ensure the provision and future management of free drinking water at appropriate locations in the new or redeveloped public realm'.

It is noted that policies D4 and D8 are general design policies not written with the rollout of essential infrastructure. Notably D4 relates primarily buildings and design and access statements which are not required as part of prior approval applications.

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

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

*'... Projected growth towards 6.9 million jobs by 2041 provides an opportunity to strengthen London's economy for the future, and doing so will depend on increasing diversification. The Central Activities Zone and Northern Isle of Dogs will remain vital to London's economic success, but growth in town centres across London will be equally important, alongside supporting local regeneration, investment in Opportunity Areas and enabling access to a wide range of jobs. Reasonably-priced, good quality employment space will be needed across London to make this happen'.*


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

GG5 'Growing a good economy' states:

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

*'... D ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth*

*E ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning'*

*'... H recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success.'*

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

Policy SI 6 states:

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

*1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users*

*2) meet expected demand for mobile connectivity generated by the development*

***3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation*** (My emphasis)

*4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.*

Para 9.6.1 states that *'the **provision of digital infrastructure** is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance. London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. Fast, reliable digital connectivity is essential in today's economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration'* (emphasis added).

Policy SI 6, A.3 makes it clear that where a site is to be lost *'appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation'*. The application proposals are required to mitigate against this loss of service.

Cornerstone's infrastructure and VMO2's network are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

### **Ealing Development Core Strategy DPD (April 2012)**


The Development Strategy 2026 (also known as the Core Strategy DPD) was adopted by the Council on the 3<sup>rd</sup> April 2012 and sets out a vision for the future development of the borough and covers a 15-year plan period up to 2026. It considers how the borough fits into the 'bigger London picture' as well as what will deliver the borough's vision. It will affect how, where and when the council will:

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- allow new housing
- create new jobs
- protect green spaces and our heritage
- provide community facilities
- ensure transport services are as they should be

It also sets the context for the other policy documents that make up Ealing's Local Plan.


Policy 1.1 sets out the spatial vision for Ealing and states:

- (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 release 11 and provide up to 128,400 gross sqm of new retail floorspace.*
- (b) *Development of these new homes, business and retail space will be primarily concentrated in:*
  - *The Uxbridge Road / Crossrail corridor - particularly focused in Acton, Ealing and Southall town centres; around key stations at Acton Mail Line, Ealing Broadway and Southall; and, municipal housing estates including Copley Close, Green Man Lane, Havelock and South Acton.*
  - *The A40 / Park Royal corridor – particularly focused in Greenford town centre; Acton Main Line, Greenford and North Acton stations; Park Royal; and, other industrial estates.*
- (c) *To promote business and enterprise by securing the stock of employment land, encouraging regeneration and renewal and being responsive to market demands. For industrial and warehousing businesses, we will protect our position as one of London's premier locations. For the office market we will reverse our relative underperformance compared to neighbours; with a focus on providing high quality office space in Ealing town centre and capturing benefits afforded by Crossrail.*
- (d) *To ensure the viability and vitality of the borough's town centres in accordance with the established shopping hierarchy.*
- (e) *To be a healthy and safe place to live and ensure that the necessary physical, social and green infrastructure and services as identified in the Infrastructure Delivery Plan are provided and enhanced in the borough.*
- (f) *To support sustainable, safe and convenient transport networks to and through Ealing that, in particular, improve north-south transport links between the Uxbridge Road / Crossrail and A40 / Park Royal corridors and to promote healthy travel behaviour and seeks to reduce the need to travel.*
- (g) *To protect and enhance suburban communities, improve public transport, cycle and pedestrian links to the development corridors and neighbourhoods.*
- (h) *To care for the borough's historic character and enhance the significance of heritage assets in regeneration proposals, ensure excellence in urban design and design out crime to make Ealing's environment safe, attractive and accessible for all.*
- (i) *To protect and enhance the pattern of green spaces and green corridors, identify and safeguard quiet areas and spaces of relative tranquillity and ensure that new development improves and adds to green space.*
- (j) *To reduce the environmental impact of activities within the borough, protecting and improving air quality and ambient noise levels, achieving and maintaining a clean and healthy environment for all communities to enjoy.*
- (k) *To promote sustainable design and construction in all development to play our part in addressing the global challenge of climate change.*

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## Ealing Development Management DPD

The Development Management DPD (also known as the Generic Development Control/Management DPD) seeks to guide decisions on planning applications where no provision has been made elsewhere (e.g. the London Plan) and where, because of the unique characteristics of Ealing we feel a more distinctive approach needs to be taken.

The council adopted the Development Management DPD on 10 December 2013.

The DPD does not include any policies specific to telecommunications however Policy EA Ealing Local Policy is entitled Presumption in Favour of Sustainable Development and states:

*When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.*

*Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.*

*Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:*

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

Policy 7.4 relates to 'Ealing Local Variation – Local Character':

**POLICY 7.4**  
**EALING LOCAL VARIATION -**  
**LOCAL CHARACTER**

**Planning Decisions**


**D** Development in Ealing's existing built areas should complement their;

- a) street sequence
- b) building pattern
- c) scale
- d) materials
- e) detailing

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Policy 7B relates to 'Ealing Local Policy – Design Amenity'

**POLICY 7B  
EALING LOCAL POLICY -  
DESIGN AMENITY**

**Planning Decisions**

- A** New development must achieve a high standard of amenity for users and for adjacent uses by ensuring;
- a) high quality architecture
  - b) good levels of daylight and sunlight
  - c) good levels of privacy
  - d) coherent development of the site
  - e) appropriate levels of development on site
  - f) positive visual impact
  - g) legibility and accessibility
- B** External treatments, fittings and materials must complement the building and context and must not impair the visual amenity of surrounding uses.
- C** Extensions to existing development should ensure that the resulting development as a whole meets design standards.

Policy D4 and D16 of the London Plan and 7.4 and 7B of the Ealing Development Management Plan Document are general design policies which sets out the criteria against which development will be assessed. The applicant notes that the policy was designed to ensure a high quality of design is achieved and is not designed to provide guidance and support for the delivery of essential infrastructure such as that proposed in this application.


These general policies have not been written with specialist telecoms infrastructure such as that proposed in this application in mind and the design of the proposed equipment cannot be altered due to the technical requirements as detailed in Section 3 above. When considering the appropriateness of telecommunications development proposals, it is imperative that Decision Makers give precedence to telecommunications specific policy where it exists. One must also appreciate that it is extremely unreasonable to expect niche infrastructural development to strictly adhere to more general policy criteria. It is noted that the telecommunications policy in this instance was written before the advent of 5G and does not therefore fully take on board the very specific technical and operational constraints of the operator.

In respect of Policy SI 6 the applicant has demonstrated that the application proposals are required to mitigate the loss of the existing site at 144059 which cannot be upgraded to provide the latest 4G and

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5G services. Moreover, the applicant has explored the possibility of using existing buildings, masts and other structures and this has proved to be unsuccessful. The applicant considers the proposal has been designed to have minimal impact on the application site and the surrounding area. The height and scale of the development has been kept to the minimum required to provide the level of coverage required. The applicant accepts that the need to attain a high standard of design is relevant and the application proposal has done this while working within very specific technical constraints, to achieve a proposal that would cause limited visual harm to the surrounding environment but that would bring wide ranging and lasting benefits to the community and local economy at a local level, and as part of a national network. The proposed installation has been sited and designed so as not to create clutter or be detrimental to the visual amenity or character of the area or wider streetscene.

An ICNIRP Certificate was submitted along with the application to demonstrate that the proposal is within the guidelines for public exposure.

### **Ealing Council Plan 2022 – 2026**

Ealing's Council Plan 2022-26 ('Plan') sets out the vision and strategy for the next four years and the Council's commitments to focus on the priorities of residents, businesses, and other stakeholders. It is a high-level strategic response to the opportunities and challenges facing Ealing now and in the future.

The council wants to make sure that new growth in the borough benefits every resident and every neighbourhood and ensure that residents can access council services when they need them taking advantage of new digital technologies.

One of the Plan's priorities is Good Growth which means promoting inclusive and sustainable growth, ensuring provision for homes, jobs and quality places, improving connectivity, enhancing green spaces and concentrating on ensuring all residents benefit from that growth. The Plan sets out commitments to achieving these priorities and in order to achieve Good Growth the Council is committed to:

*Work even harder to attract new businesses, creative industries and turbocharge the STEM, digital and food science sectors that are already working hard to make and create across the Borough.*

### **Planning Issues**

The main issues arising from this prior approval notification are whether the proposed replacement mast and cabinets due to their siting and appearance would result in harm and if so whether any perceived harm would be outweighed by the significant social and economic benefits associated with the maintaining existing services and also the introduction of 5G provision attributed to the proposal to enable sustainable development and growth across the borough and meeting the needs of its communities.


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

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Cornerstone and VMO2 are in the process of progressing a suitable site in the area for a replacement radio base station. This site is required to replace the existing site at 144059, 12/12A Mandeville Road which for technical reasons cannot be upgraded to provide the latest 4G and new 5G services.

### Principle of Development

The principle of development has been established by the Government when the new permitted development rights came into force in April 2022, which enabled sites such as this one to be built under the operators permitted development rights, with prior approval for siting and appearance being the only matters that the local planning authority can take into consideration.

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

*'The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established (emphasis added). Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion on what processes they put in place. It is important that a local planning authority does not impose unnecessarily onerous requirements on developers, and does not seek to replicate the planning application system' (emphasis added).*

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

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

The development therefore benefits from deemed planning permission under the GPDO, subject to prior approval by the local planning authority. The provisions of the GPDO require the local planning authority to assess the development solely with regard to siting and appearance, taking into account any representations received.

### Siting


The siting of the proposed radio base station has been carefully considered. To this end, the equipment has been located on private land within an enclosed area within the grounds of a commercial building on Church Road / Ealing Road. The surrounding area is a mixed use in character comprising commercial uses to the north, institutional uses to the south and residential and commercial uses to the west. The base station will be viewed in the context of mature trees some 18.50m in height. This is in line with the NPPF, Policies D4, D8 and SI 6 of the London Plan and Policies EA, 2.18, 7.4 and 7B of the Ealing Development Management DPD.

Mature trees some 18.50m form a backdrop to the installation and provide some context and will help shield the installation from the surrounding area. Consequently, the visual impact of the proposed radio base station will be minimised within the streetscene. This is in full accordance with the aspirations of the London Plan and Ealing Local Plan.

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The proposed equipment cabinets and meter cabinet, do not require planning permission, as they can be installed under the operators permitted development rights. In order to remain fully transparent, they have been included on the plans and in the description. Their limited height and scale will ensure that these cabinets will not be detrimental to the visual amenity of the area and will be finished in a grey colour and will be located within a 2.10m high palisade fence and as such will not be visible beyond the application site.

In line with the requirements of NPPF, there are no existing telecommunications installations for the operator to share, that would provide the necessary coverage to the target coverage area. Similarly, there are no buildings which are suitable and available that the operator could utilise to operate their equipment. The discounted options are set out in Section 5 above and their reasons for being discounted are fully explained.

### **Appearance**

The proposal is for the proposed installation of a 20m lattice tower, supporting 6 no antennas, 2 no dishes, together with 3 no cabinets, 1 no meter cabinet and ancillary development thereto including compound fencing.

If the overall mast height was to be lower than the existing antenna height, the antenna height would not be able to clear the surrounding clutter and they would not be able to operate effectively and the operator would require an additional installation within this cell area to replicate the coverage provided by the existing antenna which would lead to the proliferation of masts contrary to national planning guidance.

The design of the mast needs to be like this to be structurally capable of hosting all the operator's equipment on this one installation.

Exposed antennas have been designed in this location as it is the most efficient way of providing coverage to the target coverage area. The antennas could also be upgraded in the future without significant design changes, whilst maintaining quality telecommunications in this area both now and in the future. If the antennas were shrouded, they would not provide such a good coverage. It is also likely that radical design changes would need to be made in the future in line with changes in technology and consumer demand. The proposals are therefore in full compliance with NPPF, Code of Practice and Policies D4, D8 and SI 6 of the London Plan and Policies EA, 2.18, 7.4 and 7B of the Ealing Development Management DPD.

The proposed transmission dishes are needed to provide a link into the operator's network. They need a clear line of sight in order to operate effectively.


The equipment cabinets are small for telecommunications radio base stations and are located within a compound formed by a 2.1m high palisade fence and as such will not be visible beyond the application site. These cabinets could be installed under the operators permitted development rights but have been included on the plans and in the description in order to be transparent.

It is considered that the proposals for a replacement ground-based station are fully in accordance with Policies D4, D8 and SI 6 of the London Plan and Policies EA, 2.18, 7.4 and 7B of the Ealing Development Management DPD. The replacement installation will continue to enable the operators to provide a high-quality service to its customers and access to the latest technologies. An installation located outside this search area would not allow the operator to provide their desired level of new

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coverage and therefore would not adequately maintain the 3G/4G coverage/capacity gap nor enable new 5G services into the network.

### **Lack of Coverage – Material Consideration**

The proposed replacement installation is significant to enable continuous coverage of the telecommunication network, ensuring that Northolt continues to get the mobile coverage it needs. The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF and the UK Wireless Digital Infrastructure Strategy which supports infrastructure especially where growth takes place.

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

Without this replacement radio base station the operator's customers would experience increasing numbers of dropped calls and buffering unable to access the internet on their handheld devices.

The proposed radio base station is in full conformity with the London Plan and Ealing Local Plan. The proposals will ensure the replacement and improvement of high-quality communications infrastructure for the community, investing in improved community facilities which meet essential everyday needs, as important as gas and electricity. Indeed, high quality telecommunications is often seen as the fourth utility service.

The proposed replacement installation will help improve the area's economic prosperity, strengthen the urban economy's by supporting local businesses to start, grow, adapt and diversify. It will support a better environment for today and tomorrow by reducing the need to travel and in turn minimise carbon emissions. The radio base station will support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.

### **Economic and Social Benefits**


The NPPF strongly supports sustainable development, as does the authority's extant London Plan and Ealing Local Plan. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, participate in social media, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. Residents and businesses will enjoy better accessibility, assisting home-base working by improving the electronic means of communication and the roll-out of high-speed broadband helping to promote live-work development. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with NPPF, UK Wireless Digital Infrastructure Strategy and the London Plan and Ealing Local

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Plan including its Vision. to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Maintaining existing 3G and providing new 4G and new 5G services will fully meet this national policy objective.

Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

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

Paragraph 38 of the revised NPPF states that:

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

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

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

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

Indeed, MPs have noted in parliament that the UKs Superfast Broadband connectivity was 'relatively poor' and businesses were losing out from patchy coverage.


The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where they live, work, visit and travel. That is why the

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Government is committed to extending mobile geographical coverage further across the UK, with continuous mobile connectivity provided to all major roads and to being a world leader in 5G.

Further to the Government's commitment to improve connectivity, on 24<sup>th</sup> November 2016 the new permitted development rights for telecommunication operators came in to force, designed to lift the restrictions on mobile operators such is the significance and weight the Government place upon the benefits attached to modern connectivity.

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

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

The Assessment goes on to note that *'Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy'*. Therefore this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of maintaining and enhancing high quality 3G and new 4G and 5G coverage and capacity in Northolt where the social and economic benefits will outweigh the environmental considerations.

The Government's continued strong support for connectivity is further evidenced by the DCMS who launched their UK wide Digital Connectivity Portal on 20 December 2018. The Digital connectivity portal provides guidance for local authorities and network providers on improving connectivity in local areas. The Government wants everyone in the UK to benefit from world-class connectivity no matter where they live, work or travel. The Future Telecommunications Infrastructure Review outlines a package of measures to create the right market and policy conditions to deliver world-class connectivity for citizens and businesses. As a result, the pressure to provide replacement radio base station in Northolt to maintain 3G and provide 4G and 5G is significant.

The proposed installation in this location will allow two operators to utilise the same installation and provide new and improved high quality 3G and 4G coverage and capacity and future 5G service provision supporting the Government's aim of *'focusing on ensuring that everyone is connected to the information superhighway'*. This fully meets the aspirations of the NPPF and the London Plan and Ealing Local Plan.


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

The issue of benefits and a planning balance was also considered in Appeal Ref: APP/L1765/W/18/3197522 Land at junction of Andover Road and Athelsan Road, Winchester. The proposal related to the installation of a 17.5m street works pole and associated equipment cabinet at land at the junction of Andover Road and Athelstan Road, Winchester.

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The Inspector found at Paragraph 9 'The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections". In this instance, the proposal is not so much seeking to provide significantly higher standards but to maintain recent local provision of 3G and 4G services as a result of a notice to quit from a nearby site that was providing these services. The Council has commented that service provision would be 'adequate' without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision'.

In March 2020, the decision of Birmingham City Council to refuse planning permission for a proposed telecommunications upgrade was overturned by the Planning Inspectorate (APP/P4605/W/19/324191). Within the decision notice, the Inspector stated:

*'In this case, the proposed development would result in harm to the visual amenity of the area, with particular regard to the proposal's scale and siting. As such, conflict would arise with Policy PG3 of the Birmingham Development Plan insofar as the development would not reinforce local distinctiveness with a design that responds to site's conditions and the context of the local area. However, I conclude that this harm would, on balance, be outweighed by the economic and social benefits that would stem from the proposed upgrade which would not be realised whilst reducing the height of the mast. Therefore, in the round, the proposal would accord with saved UDP Policies 8.55 and 8.55A-C, the SPD and Framework paragraphs 112 and 113. Collectively, these seek to support the expansion of shared next generation mobile technology to create a modern, high quality and reliable communications infrastructure that is essential for economic growth and the life of the local community'.*

Good connectivity allows people to access a wide range of essential services and a further explanation on some of these key benefits is provided below:

#### Economic benefits

- Creating more productive and cost efficiencies for businesses
- Businesses offering online services can extend their products to a broader audience
- Local areas and businesses can benefit from tourists and visitors as hotels, attractions, and restaurants can be booked online from anywhere in the world
- Business owners and services like doctors can provide a faster and more cost-effective service by offering both online appointments and ordering
- Digital connectivity facilitates economic growth, something which the Government is keen to progress and promote
- 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 facilitate learning on the job procedures, thanks to technologies such as Augmented Reality (AR) goggles, which, for example, can give the likes of engineers real-time instructions on how to fix a machine on a production line.


#### Social benefit

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- Mobile communications can help people to stay in touch wherever and whenever, which can help improve social wellbeing
- Convenient access to online commerce or businesses
- Contacting emergency services is easier, especially in remote areas
- Giving the ability to manage our personal finances and information 24/7
- Using a mobile wherever you go can provide better personal security
- Having access to social networking sites and applications can keep people entertained with their lifestyles and interests
- Access to real-time transport information or timetables
- Smart meter reads for utilities such as gas or electric
- Contacting local authorities
- Promotion of smarter and productive ways of working. For example, working from home can help minimise commuting which can provide better work and home life balance

#### Sustainability and Environmental benefits

- Facilitating remote access to services, education, and commerce, reducing the need to travel and in turn minimising carbon emissions.
- Better monitoring and control of energy consumption through climate change technology, smart metering and smart energy grids.
- 5G infrastructure requires fewer heat generating electronic components.
- 5G enabling of the Internet of Things (IOT) sensor deployment can manage and alert us to pollution risks, health hazards and flood risk.
- Provision of smart technologies within the agricultural sector will facilitate more efficient and less wasteful practices helping to limit negative impacts.
- 5G networks allow monitoring of traffic flow resulting in less congestion and better air quality. They also make driverless cars possible; a means of transport that offers better fuel efficiency.
- Smart cities and buildings can rely upon 5G networks to enable buildings and infrastructure to use automated energy saving through better and more efficient lighting, heating, cooling and other operations.

#### Health benefits

- Support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.
- Patients across the country are now becoming accustomed to using remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.
- 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.


#### Education benefits

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- Facilitates access to educational establishment databases or booking systems for securing places for the likes of school dinners, field trips, extra-curricular activities, student/teacher reviews, etc.
- Provides access to school/college/university apps for setting and submitting homework/coursework, ensuring news and notifications are delivered efficiently, and for parent/student/teacher interactions.

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.

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

#### **Education:**

The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere. 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

#### **Health:**

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies. 5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

#### **Summary**

Cornerstone and VMO2 are in the process of progressing a replacement site in the Northolt area for a radio base station. As part of VMO2 continued network improvement program, there is a specific requirement for a replacement installation at this location to provide equivalent 3G and new 4G and 5G ensuring that this area of Northolt maintains access existing services and can access the latest technologies.

The proposed height at 20.0m is essential in order for the antennas to clear the surrounding tree clutter and be able to reach the target coverage area, to maintain and provide new high quality 3G, 4G and 5G service provision to this area of Northolt. This will fully meet the national Governments aim of '*ensuring that everyone is connected to the information superhighway*' and the national policies set out in the NPPF. If the height of the column were to be reduced then the antennas would not be able to operate effectively, leading to a degraded service for the operator's customers especially for the higher frequency technologies including the latest 4G technology and new 5G service provision.


Site selection was progressed in accordance with the applicant's licence obligations, advice in the NPPF and the Code of Practice for Wireless Network Development and represents the least

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environmentally intrusive, technically suitable, available option. Section 5 confirms there are no suitable sites outside of the Northolt Village Green. Given the extensive tree cover and enclosed nature of the application site any harm to the Conservation Area is considered to be less than substantial.

The social and economic benefits of providing reliable and high quality mobile broadband connections including 5G support growth in productivity, efficiency and labour force participation across the whole economy. This is fully supported by the NPPF, UK Wireless Digital Infrastructure Strategy and the London Plan and Ealing Local Plan. These benefits are strong material considerations which any perceived loss of visual amenity to the surrounding area.


**Confirmation that submitted drawings have been checked for accuracy**

Name: (Agent)	<u>Dianne Perry</u>	Telephone:	<u>07535932374</u>
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Signed:		Date:	<u>31.10.2023</u>
Position:	<u>Director</u>	(On behalf of Cornerstone)	<u></u>

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