



SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Shepherds Hill Streetworks	Site Address:	Shepherds Hill, Crouch End, London Borough of Haringey, England, N6 5RR
National Grid Reference:	E: 529328 N: 188343		
Site Ref Number:	HGY22059	Site Type: ¹	Macro – Street works Monopole

2. Pre Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	No
If no explain why: After a phone call to the LPA it was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	No
If no explain why: N/A Albeit those alternative sites were considered during the initial stages, no suitable alternatives were identified. As this installation is required to provide network coverage and services to the area, there is a very specific requirement that needs to be met in order to provide optimal network services to the targeted sectors. Consequently, no alternative, existing installations would provide coverage to this area. Therefore, a new site within the area is required to provide coverage and ensure that there are no coverage holes in the network.		

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	22/06/2023	
Was there pre-application contact:	Yes	No
Date of pre-application contact:	N/A	
Name of contact:	Director of Planning	

¹ Macro or Micro



Summary of outcome/main issues raised:

Prior to the submission of a formal application, the applicant initiates pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues.

Pre-application consultation letters and drawings of the proposal were sent to the LPA on 22nd June 2023. Any pre-application consultation comments received by the Agent will be passed on in full to the LPA for their consideration during the assessment and determination of the formal application.

The applicant is keen to work with the LPA and local community to ensure the proposal is 'right first time' to secure funding for the critical network infrastructure. If the proposal cannot progress this area will be left without sufficient mobile phone coverage and capacity and will not benefit from the most up to date technologies available.

Again, any comments received by the agent will be passed on to the Operator/Applicant for consideration and sent to the appointed Case Officer for their records.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green	Amber	Red
Outline of consultation carried out:			
Prior to the submission of this application, on the 22nd June 2023, the applicant initiated pre-consultation discussions with the local planning authority, local ward councillors, and representing MP. This provides an opportunity to discuss development proposals and identify site specific issues.			
Crouch End Ward Email: luke.cawley-harrison@haringey.gov.uk Email: lester.buxton@haringey.gov.uk Email: cressida.johnson@haringey.gov.uk			
MP Representing Hornsey and Wood Green – Madam Catherine West Email: catherine.west.mp@parliament.uk			
Summary of outcome/main issues raised:			
Any comments received to the agent will be passed on to the Operator/Applicant for consideration and sent to the appointed Case Officer for their records.			



School/College

Location of site in relation to school/college: No schools in close proximity.
Outline of consultation carried out with school/college: N/A
Summary of outcome/main issues raised: N/A

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

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response: No aerodrome or airport within 3km of the site.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	22 nd June 2023	

3. Proposed Development

The proposed site:
Government is committed to supporting investment in high-quality, reliable digital connectivity so that communities can benefit from faster economic growth and greater social inclusion. It is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. As part of Three UK's continued network improvement program, there is a specific requirement for an installation at this location to provide the latest 5G services, ensuring that the Crouch End area of Haringey maintains access to the latest technologies as per the Operator's license and customer obligations. The search process involved an initial 'desk-top' survey to ascertain and identify major constraints and impediments, followed by a physical search of the area. As with all 5G cells,

this is an extremely constrained cell search area and options within the area are extremely limited. Nevertheless, the most viable solution that minimises amenity issues has been put forward.

The proposed solution involves erecting a new 15m high H3G Phase 8 Street Pole installation set in the footpath along Shepherds Hill adjacent to Highgate Heights (E: 529328 N: 188343). The technical details of this proposal are illustrated within the enclosed application design drawings: (HGY22059_M001_3UK_PA_A.pdf).

It is recognised that the very nature of installing new 5G communications infrastructure within an urban setting requires a well-measured balance between the need to extend practical coverage whilst limiting visual change in the street scene. The search area is primarily densely residential, with significant amenity green space to the north and south (Figure 6). Further, it is noted that the development is just within the Crouch End Conservation Area. As such, any potential amenity issues have been considered in depth when bringing forward an acceptable scheme. The development has been such sited away as practicably possible from residential properties, whilst availing of contextual existing street furniture and strategic mature vegetation to soften impact.

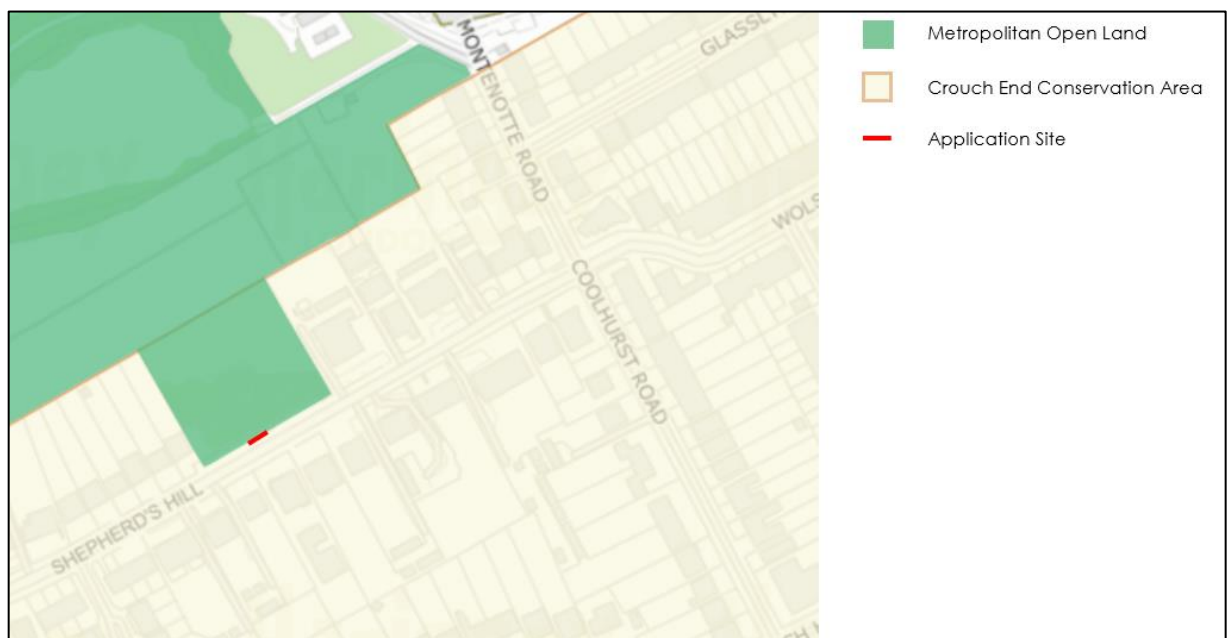


(Figure 1: Aerial View of application site in the wider context of Shepherds Hill, particularly evident is the adjacent mature trees which provide screening)

The proposed location does fall within an area of conservation but is not in close proximity to any listed building or scheduled monuments as registered by Historic England. The site falls

within the Crouch End Conservation Area (CA); however, it is close to the edge of the boundary (Figure 2). Accordingly, the principles of siting new infrastructural developments within the context of CAs in Haringey Council has been considered in bringing for the proposal before you. The search area (Figure 6) falls mostly within the Crouch End CA, apart from the portion to the north which is entirely designated amenity green space, in which development would be incongruous. However, it is noted that the proposal is close to the edge of the Crouch End CA. As such, it is considered that this area can be viewed as transitional from the more consistent historical surroundings deeper with the CA, to an area with more varied modern development (Figures 4 and 5). Though it is understood that sensitivity needs to be taken in siting within this large CA, it is also important that those residents, businesses, and visitors within the area have access to the latest technology to meet local in needs, especially when considering the environmental, social, and economic benefits of high speed internet. As such, there is precedence for a street works development, especially in the case of critical infrastructure, in which the benefits of the development must be weighed against the potential harm it may cause if there can be said to be any.

The site is also adjacent to designated Metropolitan Open Land by way of Highgate Heights, though not statutorily within, which has also been taken into account when siting the proposal. In this instance, the proposal's location next to amenity space was selected in an effort to minimise residential amenity impact, whilst meeting operational needs. Further, the mature trees surrounding the development soften the potential impact of the development to the area. The topography of the adjacent Metropolitan Open Land benefits the proposal, as the ground elevation decreases to the north. As such, when combined with mature trees the development will be screened or obscured from primary views within Highgate Heights, minimising impact to the character of the designated area.



(Figure 2: Map indicating local designations, most notable are the Conservation Area and Metropolitan Open Land. Source: Haringey Council, with additional details added by author, 2023)

The height of the pole has been kept to an absolute minimum while allowing the installation to provide this essential new 5G coverage to the intended target area. Further the style of street pole proposed is the most streamline design available to the Operator. Surrounding street lighting columns are of a similar style providing beneficial context. Additionally, neighbouring mature trees provide screening for the development from certain vantages. As such, impact to the visual and local residential amenity because of the site has been minimised and development will more seamlessly blend in with its contextual surroundings.

It is acknowledged that the application site may be visible from vistas and residences within the surrounding streetscape. However, given the site search area constraints and land uses present limited opportunities to appropriately site the proposed infrastructure exist. As such, it is unavoidable that the site will have a degree of visual impact and related change to the local street scene. The search area, shown in Figure 6, is primarily densely residential with narrow footpaths and significant amenity green space to the north and south. As such, the infrastructure has been intentionally located adjacent to the entrance to Highgate Heights, to minimise residential amenity impact whilst availing of mature trees for screening for adjacent residences.



(Figure 3: Google Street view, looking northwest at the proposed site location in the pavement along Shepherds Hill)

Dense residential areas have high demand for mobile data, thus necessitating new developments to meet operational needs, such as the site before you. The development has been sited strategically so that, again given the densely residential search area, minimal residences have been impacted. To achieve this, the proposal was located adjacent to the

entrance of Highgate Heights, so only those residences across Shepherds Hill directly onlook the development. The nearest of these are over 20m away, and benefit from viewing the development against a backdrop of mature vegetation, softening impact. The top portion of the development may be seen against the sky, which benefits from being painted galvanised grey more able to be absorbed by the sky on a commonly grey day. However, if the LPA finds a different colouring more desirable, this may be accommodated. Residences further east and west along Shepherds Hills will have less residential amenity impact due to the increasingly extreme angle necessary to view the development from main habitable windows combined with adjacent mature trees which provide screening, thus obscuring views of the development (Figures 4 and 5). As such, main residential views are constrained to two detached residences and three small apartment blocks, which, given the densely residential area, is minimal. Further, residential views already accept a number of existing street furniture items, namely street lighting columns, due to the very urban nature of this London Borough (Figures 4 and 5). As such, the development has minimised residential amenity impact as far as practicably possible, especially in light of the dense residential and urban context for the site.



(Figure 4: Google Street view, looking northeast at the site, exemplifying the mature vegetation and street furniture context)



(Figure 5: Google Street view, looking southwest at the site, again exemplifying the mature vegetation and street furniture context)

Shepherds Hill was in part selected due to its larger scale streetscape, in comparison to the only other available road in the search area, Hurst Avenue, which has a tighter streetscape in which development would feel more dominant. Shepherds Hill is more capable of hosting further development, and there is precedence for it as again the road already hosts a number of street furniture items. These street furniture items are in line and organised, so as to not have cluttered effect. The proposed development will also be in line with the existing street furniture, more seamlessly blending into the context and minimising visual impact. As such, this existing street furniture, surrounding mature vegetation, and the scale of the roadway allows the development to be comfortably hosted on Shepherds Hill without it being visually dominant.

Views of the proposal from the Metropolitan Open Space, Highgate Heights, are minimal as the elevation of the ground drops quickly to the northeast and then has a dense line of vegetation separating the entrance of the green space from the main amenity space. As such, the uphill topography in combination with dense vegetation totally obscures the development totally from view from the main open amenity green space. Again, the site falls just within the boundary of the Crouch End Conservation Area. While sensitivity needs to be taken with placing a new proposal within this designated area, evident is transitional nature of the area by way of the significant existing street furniture and modern design of some nearby buildings such as the apartment blocks, which provide precedence for the proposal before you. As such, visual impact to the character of the area has been carefully considered and minimised as possible, given the search area being entirely made up of designated land.



The proposed structure, although taller than most surrounding existing elements, would only be seen from relatively close proximity due to the screening provided by surrounding dense mature vegetation, in combination with the slightly meandering nature of Shepherds Hill. This vegetation not only provides screening for nearby residences, but also provides a backdrop for the development to be seen against, which softens visual impact and obscures the development. As such, views of the development for road users have been minimised and will be primarily transient.

Overall, the proposed siting and orientation of this proposal provides the best possible compromise that alleviates 'harmful' views from nearby residential units whilst providing a location that meets the technical requirements. Our site selection process is explained in section 6 of this report and emphasises our attempts to sensitively locate the proposal in an area that is considered to have the least possible visual intrusion from residential viewpoints.

As the site is in the footpath along Shepherds Hill, the communications infrastructure has been carefully positioned in accordance with the guidance set out within the Department for Transport (DfT) Manual for Streets (MfS) 2007 to ensure that pedestrian movement is not impeded.

The pole design should look utilitarian and regular in appearance and reflect its function. It is considered that the overall character of the development should therefore be confined to what is acceptable in the locality and over time should become an accepted feature as with other forms of communication, like roads and railways and installations used by other essential public utilities. The street works monopole design itself is typical of street furniture found in such urban locations and as such should not look inappropriate in the context of existing vertical street furniture. It is often only found when actively seeking out its presence. Thus, it is considered that the overall character of the area will not be detrimentally affected by the development.

The site should bring significant connectivity improvements, which is a material consideration in the judgment of the site suitability. The cell search area was assessed at the survey stage from the perspective of planning and residential amenity, with a detailed site evaluation, in line with the Haringey Local Plan which has helped shape this application. Additional site constraints (where there are any) have shaped the location of the proposal.

The cabinets are located at the base of the new pole and unless the site is located in Article 2(3) land these are Permitted Development without Prior Approval and do not form part of the proposal from a planning consideration perspective, however these have been included for clarity of the overall scheme.

Three are in the process of building the UK's fastest 5G network and has 140MHz of 5G spectrum (and 100MHz of it contiguous), which means our service will be much faster and shall have the ability to handle more data. In making this technology available to customers, H3G will need to provide a mix of upgrades involving existing sites and the building of new sites. New sites will be needed for many reasons, including the higher radio frequencies used



for 5G, which do not travel as far as those frequencies currently in use. In addition, not all existing sites will have the capacity of being upgraded.

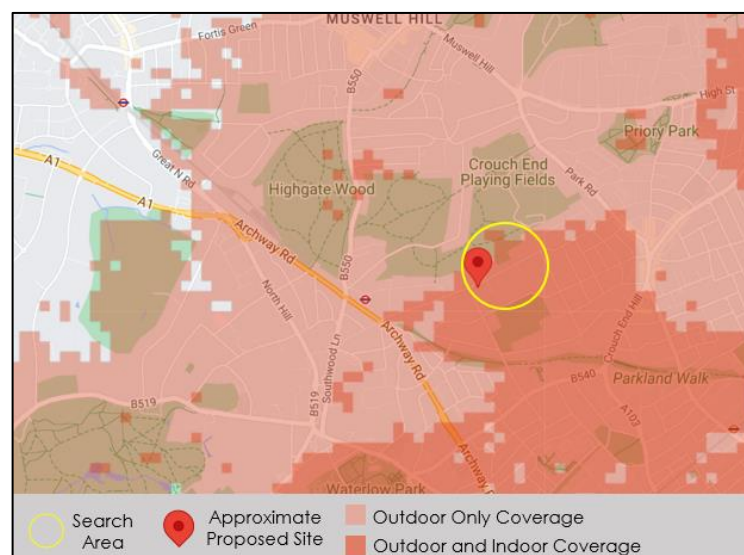
The very nature of 5G and the network services it provides, means the equipment and antennas are quite different to the previous, and existing, service requirements. In particular, the design of the antennas, and the separation required from other items of associated equipment, is such that we cannot utilise certain structures that provide an installation for another operator, most notably in a street works or highways environment.

The Government's National Planning Policy Framework sets out that an advanced, high-quality communications infrastructure is essential for sustainable economic growth. The development of high-speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.

As the shift in demand is expected for the foreseeable future and that as central government considers digital communications to be a critical national infrastructure, the intention is to support customers and local residents by ensuring as little disruption as possible.

Enclose map showing the cell centre and adjoining cells:

There is an extremely small, constrained search area for this cell. See below the cell search area and the existing Three UK coverage in the immediate vicinity. Though not ideal, often the proposal has been pulled to the edge or outside of the cell search area due to residential amenity, pavement width, underground services and planning issues. However, in the case of the application site before you, the site was able to be placed within the search area achieving operationally ideal coverage. Existing underground services continue to be a significant obstacle to the deployment of this roll out. The optimum solution from a planning and radio coverage perspective has been put forward.



(Figure 6: Map illustrating the target coverage area and existing coverage provided by Three UK. Source: Three UK Coverage Checker, 2023, with added symbology by author).



Figure 6 above illustrates the nominal Three UK site and existing coverage in the wider area. The 5G coverage provided by existing sites is shown by the red layers, with the dark red representing indoor and outdoor coverage and the light red representing outdoor coverage only. The designated search area (DSA) is indicated by the yellow area above. The equipment has to be located as close to this location as possible to ensure coverage to those areas which currently have no access. The application site before you will aid in patching the permanent network, within the optimal area, to connect with other existing and proposed sites into a continuous network. Again, while 5G can handle significantly more data, it cannot travel as far as previous generations of mobile signal. Thus, resulting in a need for new masts, particularly in areas of higher demand like dense residential settings, such as that before you. Due to the surrounding residential areas with narrow footways, the search area has been confined to main highway feeder routes running through the centre of the search area as the most appropriate siting locations.

Type of Structure:	
Description:	
Proposed 15.0m phase 8 street works monopole, 2no. equipment cabinets with associated meter cabinet, and ancillary development thereto.	
Overall Height: 15m	
Height of existing building:	N/A
Equipment Housing:	
Length:	See drawings enclosed.
Width:	See drawings enclosed.
Height:	See drawings enclosed.
Materials:	
Tower/mast etc – type of material and external colour:	Galvanised steel Grey unless otherwise indicated by the LPA during determination discussions.
Equipment housing – type of material and external colour:	Metal - Grey unless otherwise indicated by the LPA during determination discussions

Reasons for choice of design:
The proposed installation is an H3G LTE (Three) Phase 8 Monopole which will house H3G LTE (Three). The proposal is required due to acute capacity issues and will facilitate significantly improved 5G in areas that have started to gain this service and newly introduce it to the areas that have not gained this level of connectivity yet.
In keeping with the National Planning Policy Framework (NPPF July 2021) guidelines of using high quality communications infrastructure, the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing street furniture, having similar vertical lines and overall appearance to the numerous street lighting columns and some road signage lights in this area.



The 5G antennas are some 3 times as heavy as previous antennas, while the associated Remote Radio Units also now need to be placed at the top of the pole, thus many street works designs are no longer structurally capable of hosting all the equipment of 2 operators. It should be noted that the alternative option that could accommodate both operators (EE and H3G LTE who have a site sharing agreement) would be a more traditional 'greenfield' mast, with an open headframe and more bulky design, which would be inappropriate in a street scene location. There is no such location in this cell search area where a greenfield mast could be appropriately housed and thus site sharing is not a viable proposition.

The proposed 15.0m height of the structure is the absolute minimum possible to meet the operational and technical requirements of the surrounding cell, to ensure compliance with site specific ICNIRP certifications and to overcome the surrounding built and natural environment blockers by way of buildings and trees. It is considered that the proposed height and therefore the associated visibility of the scheme does not outweigh the overall public benefit of the scheme. The applicant would like to stress that the proposal is seen in the context of the Operator's license requirement and customer obligation to provide and maintain a continued network service.

The proposal has been designed with the core aim of achieving balance between minimising visual impact and achieving the technical requirements required by the operator and the government. It is necessary for the height of the structure to ensure that interference is avoided, the topography of the landscape does not have an unacceptable impact upon mobile signal quality and that the structure is able to support the necessary technologies.

In order for the base station to effectively provide coverage to the desired areas and fit in with the established network pattern, specific antenna orientations and heights, determined by network radio planners, must be achieved. Features of the surrounding area such as existing buildings and trees referred to as 'clutter' must be cleared so the antenna can 'see over' any obstructions in order that they do not block the signals from the antennas.

The physics of RF creates technical constraints that must be overcome – this directly dictates siting and design of infrastructure. Higher RF means significantly more data can be transmitted, but it cannot propagate as far or through material as well. It is a necessity that sites are sited directly within or as close as practicably possible to the target service area (search area will be smaller) and are sufficiently tall to see over trees/buildings/topography that will impact propagation.

The technical requirements of mobile communication operators such as Three UK are acknowledged in the National Planning Policy Framework which states that local planning authorities should support electronic communications networks and their provision, including telecommunications and high-speed broadband.

It is therefore considered that the proposal before you strike a good balance between environmental impact and operational considerations. The proposed height and design of this installation represents the best compromise between the visual impact of the proposal on



the surrounding area and meeting the technical requirements to provide high-quality and high-speed communication infrastructure essential for economic growth to improve a critical service as illustrated by the NPPF.

4. Technical Information

ICNIRP Declaration attached	Yes	No
ICNIRP 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.		
When determining compliance, the emissions from all mobile phone network operators on the site are taken into account.		

5. Technical Justification

Predictive coverage plots available upon request.

Reason(s) why site required e.g. coverage, upgrade, capacity (map attached if required):
The licence granted to H3G LTE demands that strict coverage qualities are met. It is essential that the benefits of mobile communications are available for all communities.
The National Planning Policy Framework clearly states that authorities should not question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.
The site is required to provide new 5G coverage for Three UK in order to improve coverage in the Crouch End area of Haringey Council.
Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV, and downloads. The base stations are connected to each other (by cables or wireless technology) to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. There are several variables that determine the size and shape of each cell.
As base stations are low-powered radio transmitters they each have a limited range, meaning that they generally need to be located close to (or within) the target area which requires coverage. If a base station is moved too far away from the target area, then it is likely that some sections of the target area will remain without the sufficient network services.



6. Site Selection Process – alternative sites considered and not chosen

The operator's acquisition and survey agents endeavoured to identify a site location which would minimise any potential impact on the character of the area however a communications site would be required to be located as close as possible to where the customer demand is present.

In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF) following search criteria have been utilised. Firstly, consideration is always given to sharing any existing telecommunication structures in the area, secondly consideration is then given to utilising any suitable existing structures or buildings and thirdly sites for freestanding ground-based installations are investigated.

This sequential approach is outlined below:

- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPPF all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Ofcom Site Finder mast register is always examined prior to the submission of an application.

There are no existing communications sites in the area which would be able to host additional communications apparatus due the extent of technologies to be accommodated. The existing telecommunications base stations present in the neighbouring areas would not be able to accommodate the additional Three UK equipment as they would be too close to the existing operational site for those cell areas. This would result in an overlap of coverage and would simply cover an area already covered and not the target area. This would cause interference, being too far removed from the intended target area within Crouch End where the specific network coverage is required.

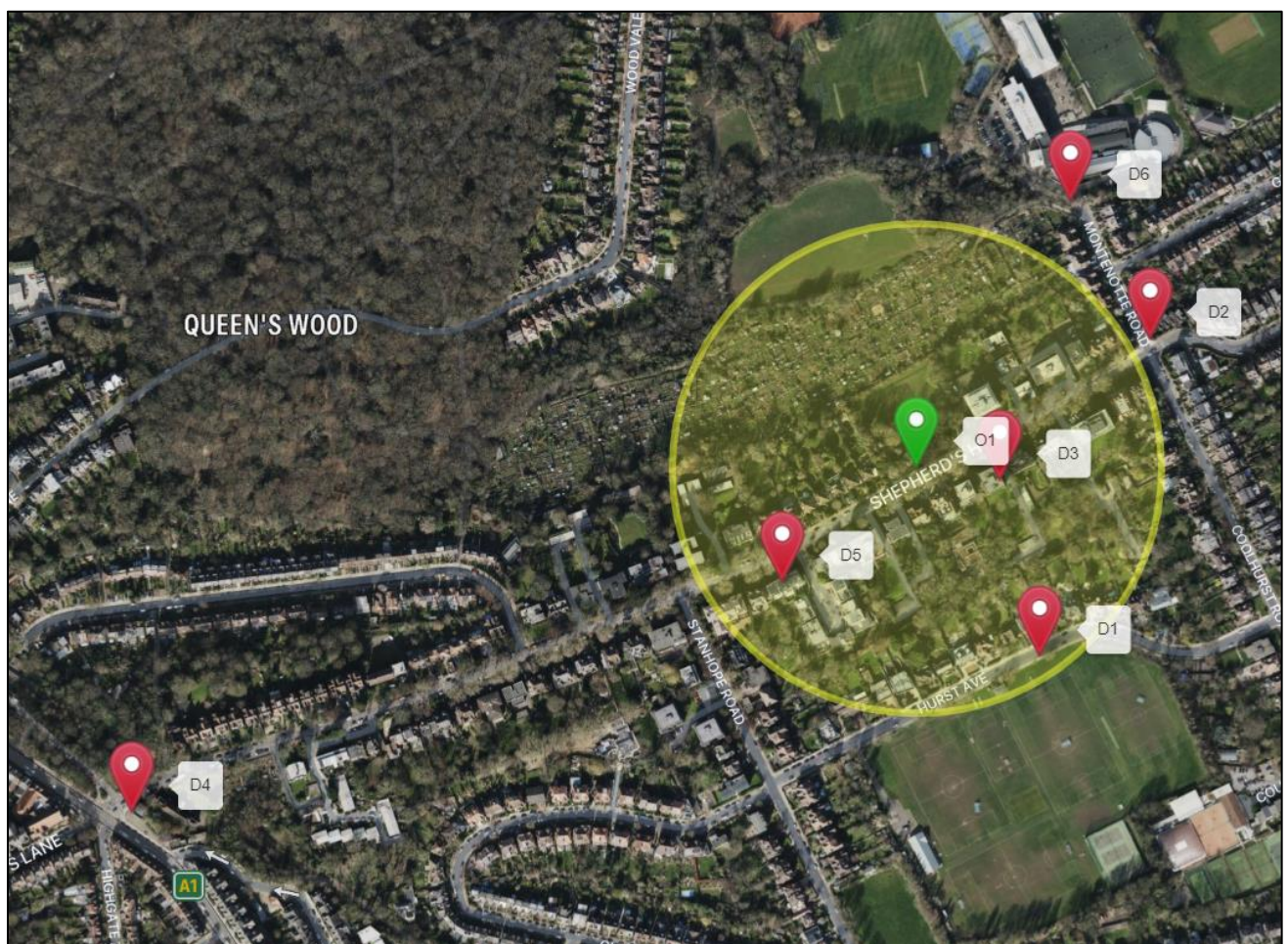
The layout of the surrounding built environment presents significant challenges due to the density of residential developments coupled with the topography meaning that there are few available areas that are suitable to accommodate a telecommunications installation due to the limited space available both underground (due to services) and above ground as a result of narrow footpaths.

The characteristics of telecoms sites are that they must be environmentally suitable, capable of being developed (e.g., ground conditions) and safe and secure.

For a rooftop installation the roof must be flat of sufficient height with clear lines of site to neighbouring base stations and be structurally able to accommodate the heavy equipment. Within the search area, the roof scape is primarily pitched domestic roofs and as such there are very limited rooftop sites to consider. There are some flat roofs to consider; however, these

are almost entirely apartment blocks or private residences on which electronic communications development would be unlikely to meet ICNIRP standards, and further may not be of sufficient structural capacity to support the development. This will be further discussed below.

The following sites were investigated for their potential to accommodate a communications site, however for the reasons detailed below, the locations sought were subsequently discounted in favour of the proposed application site. The search area was largely discounted as it is primarily dense residential in nature with narrow footpaths, or open amenity green space in which development would be incongruous. As such, the development was sited on Shepherds Hill to avail of a more appropriate street scale and contextual surroundings.



	Site name and address	NGR	Reason for not choosing site
D1	11, Hurst Avenue, Shepherd	529433 188191	This site is in the footpath along Hurst Avenue, adjacent to playing fields. While this site has a similar amount of residences onlooking the site, it was discounted in favour of the application site for a number of reasons. Primarily, the



			footpath is not wide enough to comfortably host the development without impeding pedestrian movement. Further, the streetscape is tighter all together, thus the proposal would be dominant within the area. This is emphasised by the open nature of the adjacent playing fields. As such, it was discounted in favour of the application site.
D2	1, Montenotte Road, Shepherd	529517 188453	This site is in the footpath along Wolseley Road, at the intersection with Shepherds Hill, Coolhurst Road, and Montenotte Road. While the footpath is wide enough to accommodate the proposal, there are several pieces of existing street furniture staggered in the area, thus further development may cause a cluttered appearance. Additionally, the residential amenity impact would be higher in this location as there are main habitable forward facing windows on looking this site from all directions. Finally, the tighter streetscape and the adjacent downhill topography and open views would mean that the development would be prominent in its surroundings. Thus, it was discounted in favour of the application site.
D3	66, Shepherds Hill, Shepherd	529396 188335	This site is a rooftop location adjacent to the application site. While it benefits from tucking development from view, the roof is likely not structurally capable of supporting the development. Further, as the building is an apartment block, the development would likely not meet ICNIRP standards for the top floor apartment units. Thus it has been discounted.
D4	Gonnerman, 408-410, Archway Road, Shepherd	528692 188045	This site is in the footpath along Archway Road at the intersection with Shepherds Hill. While the footpath is sufficiently wide to host the development, the location in front of a local business would likely be detrimental to it. Additionally, the large streetscape of Archway Road is an appropriate context for development; however, the main reason for discounting the site is that it is too far removed from the search area, thus likely operationally insufficient. Again, it was discounted in favour of the application site.



D5	46, Shepherds Hill, Shepherd	529220 188247	Like D3, this site is a rooftop location on a terrace unit further along Shepherds Hill. The rooftop would not be structurally capable of hosting the site and is not of sufficient height for proper propagation. Further, as it is the roof of a privately owned residence, it is an inappropriate location and would not meet INCIRP standards. It was also discounted in favour of the application site.
D6	Highgate Wood School, Montenotte Road, Shepherd	529449 188564	This site is adjacent to Highgate Wood School along the Cot Way footpath. The footpath is not wide enough to comfortably host the proposal without impeding pedestrian movement. Further, the footpath provides community amenity and is not an appropriate context for a streetworks site. The proximity to a local school is also considered inappropriate, as the development would likely be domineering over the school, and the associated high foot traffic made up of students and parents. Finally, residential amenity impact is high at this site as it is a tight residential street. Thus, it was discounted in favour of the application site.

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

N/A

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

Adjacent to designated Metropolitan Open Land.

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

Within Crouch End Conservation, though at the transitional edge of the designated area.

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

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



When considering the appropriateness of telecommunications development proposals, it is imperative that Decision Makers give precedence to telecommunications specific policy where it exists. If it does not exist at a local level, or if the policy is out of date, then the NPPF must prevail. One must also appreciate that it is extremely unreasonable to expect niche infrastructural development to strictly adhere to more general policy criteria.

The following information outlines the various planning guidance and policy that has been considered relevant to the subject application. It is not necessary to quote extensively from these documents, but the following points are highlighted.

Planning Policy

National Plan Policy Framework (NPPF) July 2021

This proposal and the work undertaken prior to submission has had full and proper regard to both central Government guidance and Local Plan Policy.

The National Planning Policy Framework Details Government guidance on planning for telecommunications development. This confirms the principal policy of the Government to facilitate the growth of new and existing telecommunication systems, whilst keeping the environmental impact to a minimum.

Relevant extracts from the (revised) NPPF 2021 are as follows:

114. 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 and full fibre broadband connections.

115. The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.

118. Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

206. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the



setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

This application includes the requisite ICNIRP certification.

In addition, the recently revised DCMS Code of Practice (March 2022) also emphasises the government's commitment to improved communications infrastructure and coverage. Relevant extracts from this document are as follows:

9. As the demand for mobile data in the United Kingdom is increasing rapidly, it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.

15. Section 10 of the NPPF sets out the planning policies for communications development in England, and states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. The NPPF also sets out that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies. Other sections of the NPPF set out how these policies should be balanced with other considerations, including conserving, and enhancing the natural environment and historic environment.

16. 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.

22. The choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible.

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.

27. Planning authorities should consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. In general, it should not, therefore, be appropriate for planning authorities to seek wider 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.

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'.

64. All wireless network installations are principally guided by the technical need for the site and the technical constraints placed upon transmitting a signal. The siting and design of such installations must therefore be balanced between visual impact and these needs and constraints. As set out in the siting and design section above, the three primary technical and operational considerations for installation sites are: ensuring that wireless infrastructure provides an appropriate level of coverage over the intended geographical area; ensuring that sites have sufficient capacity to meet user demand; and, requiring a connection to the wider network 'backhaul'.

65. Planning authorities should take account of these constraints, and those set out below, on network deployment and siting and design, when considering proposals.

It is our view that this particular scheme aligns with the above guidance and policy.

UK Wireless Infrastructure Strategy (April 2023)

This Strategy, put forth by the Department for Science, Innovation & Technology, sets out a policy framework to help deliver the Government's priority of growing the economy and ensuring the UK benefits from advances in wireless connectivity. Supported by the Secretary



of State and Minister of State, the Strategy recognises the revolutionary nature of 5G and thus the imperative nature of ensuring nationwide provision.

Within the Strategy, the Secretary of State details, “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 lead 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.”

Further, the Minister for State shows her support, “The power of 5G and future telecoms advances will unlock new solutions in everything from industry to healthcare. Falling behind in coverage will mean falling behind in international competitiveness when it comes to the technologies of tomorrow, and failing to provide British people with innovative, life-enhancing services on secure, resilient networks.

The Wireless Infrastructure Strategy, developed through close engagement with industry and local bodies right across the country, sets out our plan for gripping this critical challenge and delivering our new ambition to provide nationwide coverage of standalone 5G to all populated areas by 2030.”

The Strategy further details the importance of wireless connectivity, such as the use of Streetworks monopoles, in achieving a complete network for 4G and 5G. Additionally, the Strategy identifies the key role that planning has in providing opportunities for Operators and LPAs to work together to bring forth successful schemes which will ultimately create a complete network.

Local Guidance

In terms of Local Plan Policies, by virtue of Section 70 of the Town & Country Planning Act 1990 [further enshrined in section 38(6) of the Planning and Compulsory Purchase Act 2004], development should be in accordance with development plan policies, unless material considerations indicate otherwise.

The statutory **Haringey Local Plan** is comprised of several different documents, including the **London Plan**, the **Strategic Policies DPD (SPD)**, and the **Development Management DPD (DMP)**, amongst other documents which are not relevant to the proposal before you. The **London Plan** will be discussed in further detail below. The **SPD** was adopted in 2013 to set out the long term vision of how Haringey should develop by 2026 and sets out the council's strategy for achieving that vision. The **DMP** was adopted in 2017 and sets out the planning policies to aid in determining planning applications. There is a new Haringey Local Plan in development, but it is still in drafting stages.



The Local Plan does contain specific telecommunications policy, which will be outlined below, in combination with other relevant considered policies for the proposal before you.

Policy DM54: Facilitating Telecommunications Development states, inter alia:

"The Council will promote the development of advanced, high quality communications infrastructure to support economic growth and more accessible, inclusive communities. This will be achieved by requiring new development proposals to:

- b. Be designed in such a way as to be capable of facilitating delivery of high speed broadband technology;*
- c. Demonstrate how they will improve communications infrastructure in areas of poor broadband connectivity, as identified in Haringey's Infrastructure Delivery Plan, including through connecting of the development to a nearby trunk network; and*
- d. Deliver 'ultrafast' connections in Regeneration Areas; and*
- e. Be designed to meet the requirements of Policy DM3."*

Further, under the heading **Telecommunications** it is stated, *"The Council recognise the important role that telecommunications have in supporting sustainable communities, particularly in terms of economic development. It will therefore seek to facilitate the delivery of this strategic infrastructure across the Borough."*

The plan then goes on, *"Where planning permission is required for telecommunications equipment, the Council will aim to minimise any adverse impact of such development on visual and aural amenity, as well as on public safety, without restricting its provision."*

It goes on to state, *"Whilst recognising there may be potential of the siting of telecommunications apparatus and associated structures in conservation areas... the Council will ensure that the character and quality of heritage assets and their settings are preserved..."*

Policy DM3: Public Realm states, inter alia:

"Telecommunications equipment

- D. Proposals for the installation of telecommunications equipment will be permitted where:*
 - a. It is demonstrated the equipment is limited to the minimum operation requirement, which should include any future-proofing requirements to accommodate anticipated improvements in infrastructure;*
 - b. Opportunities for sharing facilities, such as masts, cabinet boxes and satellite dishes, and erecting antennae on existing buildings or other structures has been fully explored and taken advantage of;*
 - c. There is no significant adverse impact on the visual amenity of neighbouring occupiers;*
 - d. There is no adverse effect on the external appearance of the building, street scene, or spaces in which they are located;*



- e. *The size of any equipment visible from the street is minimised (including satellite dishes, other domestic equipment and any supporting structures);*
- f. *They are located discretely and do not detract from the special character and appearance of heritage assets or conservation area (see Policy DM);*
- g. *They are appropriately designed, coloured, and landscaped. For dishes, this may include installing a mesh or transparent structure;*
- h. *A minimum residual footway width on main pedestrian roads is preserved, in line with the Manual for Streets"*

Other considered relevant policies include:

- **Policy DM1: Delivering High Quality Design** which discusses development and design standards.
- **Policy DM9: Management of the Historic Environment** which discusses the need to balance protection of hist
- **Policy SP11: Design** which discusses ensuring new development fits into or enhances the built environment of Haringey.
- **Policy SP13: Open Space and Biodiversity** which discusses the need to protect and improve the Borough's park and open spaces.

As such, the proposal before you accords with these policies by minimising residential impact as possible through careful siting to avail of mature vegetation for screening and better contextual surroundings. The proposal is, again, the minimum height and slimmest design available to the Operator whilst remaining technically operational. It is of a similar style to the surrounding existing street furniture, namely street lighting columns, which sets precedence for the development. The colouring has been intentionally selected, but this is again open to discussion if the LPA feels there is a more appropriate colouring option. Thus the proposal will not have detrimental impact to the character of the area, by minimising visual impact whilst being placed in contextual surroundings so that it is more easily absorbed. The inability for mast sharing or the siting on an existing building has been discussed and discounted due to the changing operational needs of 5G technology. The need to protect the Crouch End Conservation Area and Highgate Heights Metropolitan Open Land is also noted, but again, given the existing context of street furniture and large streetscape, along with significant dense and mature vegetation for screening (particularly for park users and residences further along Shepherds Hill) there is precedence for this proposal at the edge of these designated zones. As such, the proposal furthers the goals of the Council to create a stronger telecommunication network for sustainability, economic and infrastructural needs, while meeting the relevant design standards and reducing impact.

The London Plan

The London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area.



Policy D2 Infrastructure requirements for sustainable densities – this policy recognises that infrastructure providers, which includes mobile Operators, will need to provide additional infrastructure capacity to meet future development. Increasing network capacity is one of the aims of this proposal:

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

Policy D3 Optimising site capacity through the design-led approach – this policy outlines the need for high-quality design, following a design-led approach to consider the most appropriate design options for the context of the area. Considered facts include form and layout, experience, and quality and character.

The proposal accord with this policy as, again, it has been sensitively located as possible within the dense residential and sensitive designated area to avail of appropriate context and street scene, which has been previously described in detail. As such, considering the operational requirements, service area needs, and character of the area, the proposal before you is the optimal solution.

Policy SI 6 Digital connectivity infrastructure – this policy is more explicit in requiring that new developments should meet increased demand for mobile services:

‘To ensure London’s global competitiveness now and in the future, development proposals should: (2) meet expected demand for mobile connectivity generated by the development’ (emphasis added).

The importance of the role that the digital sector plays in economic growth is further recognised in paragraph 6.8.3 stating that it ‘supports the growth and evolution of all sectors in the economy...The Mayor will support the growth of the tech and digital sector across all of London’.

Policy SI 6, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing the Operator to provide continued network coverage and critical infrastructure to the surrounding area.

London Infrastructure Delivery Plan 2050 (published 2014)

As part of the work on the 2015 London Plan Alterations, the Mayor commissioned work to develop a long-term infrastructure investment plan for London, and in 2014 the ‘London Infrastructure Delivery Plan 2050’ was published. The stated aim of the Infrastructure Delivery Plan is to provide for fast, ubiquitous access to the internet from mobile and fixed devices.

Chapter 16 of the Plan, Digital Connectivity, indicates how the Mayor’s Office will support a mix of technologies including mobile broadband and future methods of wireless internet



delivery to address the capacity crunch in the short term, as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s.

Deployment of the proposed base station will contribute to London's agenda for reliable high-speed communications as it has been designed to address the critical need for continued network coverage that will be lost from the area, and further the design solution proposed will be future proofed to incorporate emerging and future technologies. Among other matters the Delivery Plan stated:

"Broadband is now considered the fourth utility. The Government has stated that it wants 99% of the population to have superfast connections by 2018. Internet access speeds and coverage affect the productivity of businesses and are now a factor considered by homebuyers. Access is not only essential to many businesses, but also, as more local authorities are encouraged to move the services they provide online, access is essential for residents to be able to take part in a modern society. The Mayor wants every resident and business in London to be able to have affordable highspeed internet connectivity, should they choose to access it".

A coverage gap within the existing network impedes communications services and connectivity and is in complete conflict with the expressed aims of the London Mayor's office and Government. This proposal seeks, individually, to provide network continuation and enhanced services, as part of a wider scheme, to remedy it wholesale.

TfL Healthy Streets Indicators

The TfL Healthy Streets Indicators in conjunction with the Mayors Vision Zero Action Plan seeks to ensure that safety is at the forefront of all design schemes that relate to transport routes and adopted highways/ pavements.

The objectives are in relation to improving (or in our case not detracting from) people's experience of a street, to help meet the aim of 80% of journeys to be made by foot, cycle or public transport in London by 2041 and increase the appeal of sustainable travel over private car use. The guide uses a series of questions to highlight factors to keep in mind when designing something which will affect streets.

The proposal has been brought forward to ensure that it will contribute to a high-quality pedestrian environment and not undermine the existing provision by virtue of narrowing the existing footway. The proposal will not interfere with the operation of neighbouring bus operations or safety of passengers awaiting services and will not restrict the free movement of pedestrians, wheelchairs or prams from navigating the public footways. The proposed sitting will not pose a distraction to road users or bus drivers. As such it is considered that the proposal upholds the aspirations of the Healthy Streets Indicators.



Planning Assessment of the Proposal

The proposed installation will enable the operator to provide the required improved 2G, 3G and 4G services to area while also providing new 5G services, forming part of a network of high technology. These services allow home working and working on the move which can reduce the need to travel, thus contributing to the sustainability agenda.

The Government's latest thinking strongly supports communications infrastructure. Section 10 relates to 'Supporting high quality telecommunication'. Paragraph 114 of the framework document sets out the objectives of the communications Infrastructure. It states that 'advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being'. This is echoed by the Councils' own policy and economic strategies. 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.

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

In order for the UK to benefit from the huge potential of 5G, Local Planning Authorities will have to weigh the Public Benefits of such connectivity with the requirements to instruct and manage the built environment. Central Government understands that this may present concerns with the various design solutions proposed but it is important that all Local Planning Authorities understand the technical needs of 5G and the wider advantages of such new technology. This is further emphasised within the National Infrastructure Commission's report in 2016, where National Digital Strategy will be directed through the Economy and Industrial Strategy Cabinet Committee in order to:

"Support and challenge local government in their plans to enable the delivery of digital infrastructure; both in terms of ensuring that these plans help the UK to meet its national objectives, and that local authorities develop consistent approaches to support the deployment of mobile infrastructure across the country".

The principle of development has been established by the Government when the new permitted development rights came in to 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'.

When taking on board all material planning matters, it is evident that the main issues in the determination of this application should concentrate on its siting and appearance and so its effect upon the character and appearance of the area. In this respect the case should be assessed as to whether any harm caused by reason of the mast's siting and appearance is outweighed by the potential availability of alternative sites elsewhere that if they exist are realistic options that are less harmful. Furthermore, in making a balanced assessment, it must be considered as to whether the design has been minimised so far as practicable. Design criteria include the height of the mast and so this must be appreciated within the scope of telecommunication development in order to address the need for the new base station to deploy improved coverage and capacity and the next advancement in mobile technology – 5G, as per the network operators license agreement.

The fundamental principles applied by the applicant are always to minimise the contrast between the siting and appearance of the site-specific proposal in its relationship with its surroundings, when balanced against the various factors that have brought Three UK to progress this particular spot and specific scheme. Irrespective of the installation's use as a telecommunications base station, the introduction of a new mast will always be, to some degree, a noticeable addition to regular passers-by and residents found closest when seeking out its presence. However, it should be recognised that visibility does not automatically equate to an overwhelming adverse harm occurring nor is there a right to a view. Therefore, just because the base station will be seen and is different to an existing structure that people have become accustomed to, then this should not automatically equate to the mast being unacceptable. A balanced assessment should be made when considering all material planning considerations, most notably there should be an appreciation of what is achievable within the scope of telecommunication infrastructure that has ultimately influenced the scheme's siting and appearance.

With regards to the appearance and so the proposed base station's design, the technical requirements of telecommunication operators like Three are well documented. As previously discussed, the appearance of the base station is justified when taking into account the structure designs that are available in fulfilling Three UK's license and network demands and other similar masts in the wider area. In this respect, Street Works masts may not always be reflective of immediate structures which are intended to serve a completely different



purpose. Indeed, it is the technical requirements of the operators and the antennas used that dictate the height and design of their installations. Therefore, it should be recognised that it would be extremely unrealistic to expect that a Street works style mast could replicate exactly the height and aesthetics of existing linear street furniture that serve a different purpose. Simply put it would not present a viable solution that would meet the operator's technical requirements to replicate the height and form, of for example a street lighting column nor vice versa would a telecommunications scheme suit a different purpose other than that which it was intended to do.

The proposed works are not to the visual detriment of the surrounding area (being suitably distant from sensitive receptors). The proposal would not result in demonstrable harm to the character of the immediate or wider area but are vitally necessary to ensure improved delivery of service. Capacity and coverage are the key drivers for this new 5G installation. The proposal would respect and continue to maintain the character of the area, would be suitably distant from potentially sensitive users, and so would be compliant with the relevant principles of the Haringey Local Plan policies. It fully accords with the requirements of the NPPF.

The applicant would reiterate that the siting of any base station proposal is intrinsically linked to operational need, the availability of sites and the land uses present within the target area. The design of a base station is in turn dictated by function and the context of the nominated site.

It is important that the reader appreciates that it is almost impossible to introduce new infrastructural elements to any environment without some degree of impact. Indeed, with communications infrastructure, it is virtually impossible to physically enhance the setting in which it is located and often all that can be done is seek to limit impact to an absolute minimum through sensitive siting and design practices, as has been the case.

There should be a clear distinction between 'harm' and 'visibility'. Just because something is visible, does not necessarily infer that it is inappropriate to the street scene, or will lead to 'harm'. The site is not located in close enough proximity to listed or locally listed heritage assets. Though it falls within Crouch End CA, it must be noted that the entirety of the search area is within designated land, and given the densely urban surroundings, a streetworks site was determined more appropriate than an incongruous development in the amenity green space. Further, the proposal is right at the edge of this zone, thus it can be seen as transitional, as the area already hosts existing street furniture setting precedence. However, sensitivity has been taken in locating this proposal within this designated area, being sited to avail of mature vegetation for screening and at the entrance of the green space to minimise residential impact.

It is acknowledged that views of the installation will be visible for road users along Shepherds Hill; however, these views will be primarily transient. Long to medium distance views when approaching the site will be mitigated by the mature vegetation which screens and obscures views of the development from further along the road, in combination with the minorly meandering nature of the road. This siting has also reduced residential amenity impact as



possible by being sited away from dense residential areas given the constrained search area, instead placed amongst more contextual surroundings with mature vegetation with less residences directly onlooking the site. The apparatus will not appear significantly obtrusive from these viewpoints and in relation to the overall context, i.e. the distances involved and the presence of both intervening and wider panoramic features must be taken into account. One will note the amount and variety of infrastructural features that exist.

The most visible component of the apparatus is the monopole itself which cannot be screened for operational reasons and any attempt to do so would look unusual and unrealistic in this setting. From an operational perspective, antennas must 'see' the area they are providing service to, otherwise they cannot send a signal and they cannot work. This is reflected in the 15.0m height requirement of the proposed monopole. Further to this, each element of this proposal has been limited to an operational minimum in terms of size and amount.

The applicant has suggested the installation of the galvanised steel pole which will be grey colouring to achieve least contrast when viewed against the predominantly grey English sky and land uses, thereby minimising its visual impact and allow the pole to assimilate with the immediate surroundings and the context in which it will be seen. The applicant is however open to discuss colour options should the LPA wish to do so.

The location sought is believed to strike the appropriate balance, in light of the local constraints, between visual amenity and change and the objective and purpose of the development proposal. It is considered that the development accords wholly with the criteria outlined in the Haringey Local Plan.

The proposed scheme would cause little harm to the surrounding area. Any potential adverse impacts of allowing this scheme would not 'significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as whole'.

Residential Amenity

Whilst it is not disputed that the proposed monopole will be visible from certain surrounding vistas and residential dwellings, the applicant contends that when assessing the impact of the subject proposal, there needs to be reasonable consideration about where and in what context views of the development will be afforded; just because a development is generally visible and is in proximity to residential areas where demand is highest, does not necessarily equate to a significant detrimental impact.

Planning is carried out in the public interest, and it is only when private and public interests coincide can a view to a third party's land, in this case the public highway, which is essentially a private property interest become a material planning consideration. As with views over any adjoining land, that the proposed radio base station may be visible from nearby properties does not equate with harm and cannot normally be regarded as a material planning consideration. It is only when the visual impact of adjoining development, in this case the proposed radio base station, from a principal living room of a nearby property becomes



overbearing can it be considered as a material consideration. It is at this point that public and private interests will coincide. In situations where views of the proposed development when seen from the principal living room windows of an adjoining property will appear oppressive, for example, when there is serious overshadowing, loss of daylight and sunlight, or proximity of long lengths of two-storey blank flank wall along the common boundary between two properties, it will become a material consideration.

This is certainly not the case at the application site. The view of a communications pole cannot be said to be in any way overbearing or inappropriate and could therefore not be a material planning issue in the determination of this application for prior approval.

This position was confirmed at appeal for a radio base station in Barnet. In allowing the appeal for a 20m mast and 4 radio equipment cabinets in its own fenced compound at Hadley Wood Station, Inspector Fort stated at paragraph 21 of his decision:

'The proposal may be visible from windows of residential properties. However, due to the separation distances achieved between it and the nearest dwellings and its relatively slim profile at higher level, it could not be said to constitute an overbearing structure that would be unduly harmful to outlook. In terms of the proposal's effects on private views, these are matters that the Courts have held can rarely be instrumental in planning decisions, and as such I only attach very limited weight to these considerations in arriving at my decision'.

The proposed development will therefore not appear unduly prominent when viewed from within the immediate vicinity or the wider surrounding area, given its siting, scale and design.

Economic and Social Benefits

The NPPF strongly supports sustainable development, as does the Haringey Local Plan and London 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 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. Enhancing the 2G, 3G and 4G coverage and capacity in this area and enabling future 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.

Providing the latest digital infrastructure to enable improvements in digital technology empowers and enables residents to have the highest quality of life, supports the creation of high-quality jobs and achieves the maximum productivity levels. It also helps the economy to be resilient and competitive. This is in full accordance with the ambitions of Haringey Council. It will help Crouch End become an area where its businesses, public service providers and citizens are using digital technology by default and to the fullest to grow their businesses and improve productivity to access skills, training and employment opportunities to address global challenges that have a local impact such as ill health, social isolation, and pollution; to improve living standards and well-being, helping people to lead prosperous and rewarding lives; and to improve the quality and value for money of public services.

Further the benefits of high quality mobile connectivity including: promoting economic growth by attracting investment from business, which creates jobs and regional prosperity in line with national and local economic strategies; helps local businesses to offer a broader range of services, boosting the local economy; helps local Councils to offer online services such as school admissions and local information for residents supports local companies by facilitating working from home, offers social benefits such as being able to connect with vulnerable family and friends (a life line during COVID 19 lockdown) or contact the emergency services 24/7, and helps local councils to offer online services such as paying council tax bills which provides a more efficient service to name but a few benefits.

Summary

In conclusion, material planning weight should be given to constraints of the search area that has resulted in the pursuit of this scheme. Moreover, weight should be assigned to the need and the delivery of enhanced network coverage in fulfilling the operator's technical requirements in this part of Crouch End within Haringey. In this respect the proposal is in accordance with the relevant planning policies and when taking a balanced assessment, any foreseen harm will be less than substantial and outweighed by the social and economic benefits the development will bring to the area.

Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 126) of the National Planning Policy Framework. It states: *"Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."*



The applicant acknowledges that the local environment is unique, contributed to by the associated land uses, however, it should also be appreciated that each generation should therefore shape and sustain the built environment in ways that allow people to use, enjoy and benefit from it, without compromising the ability of future generations to do the same. Change in the built and historic environment is inevitable, caused by natural responses to social, economic, and technological change.

Without this proposed site, network coverage for H3G LTE (Three UK) in this area preventing the customers for the leading network operator from accessing their mobile devices contrary to the operators' license agreement and purposes in which the consumers purchased their mobile handsets, as well as being contrary to the guidance set out in NPPF. It will also be contrary to the aspirations of Haringey Council, tasked with supporting the delivery of improved digital connectivity.

It is argued that the proposal will not detract from the value of the area and further would not lessen the settings contribution or value to the local and wider area. The development may be visible from certain viewpoints, but one must acknowledge that it clearly does not detract from it to an unacceptable degree.

The scheme design is of a high standard and will not detract significantly from the existing visual and environmental character of the area. The benefits to residents and visitors by maintaining coverage to the area far outweigh any potential perceived negative impacts. In all these circumstances it is concluded that there no policy or other objections that would warrant the refusal of planning permission and accordingly permission should be granted for the proposed development.

I confirm that the submitted drawings have been checked for accuracy

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