

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Broadwater Lodge SW	Site Address:	Land at Broadwater Lodge Higham Green Haringey N17 6NN
National Grid Reference:	E: 532845 N: 189899		
Site Ref Number:	CTIL_150097_21	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

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

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	
If no explain why:		
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:	05 June 2023
Name of contact:	Planning Department
Summary of outcome/Main issues raised:	
No response at the time of making the application.	

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	

¹ Macro or Micro

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Summary issues raised:

N/A

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:			
Pre-application consultation was carried out with the local ward councillors for the West Green Ward and the local MP David Lammy. Pre-application consultation letters and drawings of the proposals were sent to these parties on 05 June 2023.			
Summary of outcome/main issues raised (include copies of relevant correspondence):			
No specific comments received at the time of making the application.			

School/College

Location of site in relation to school/college (include name of school/college):
None nearby in terms of the Code of Best Practice.
Outline of consultation carried out with school/college (include evidence of consultation):
N/A
Summary of outcome/main issues raised (include copies of main correspondence):
N/A

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

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

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Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	28 July 2023	
Copy of Developers notice and proof of deliveries including email delivery receipts enclosed with this application.		

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Cornerstone Industry Site Specific Supplementary Information (England) V.5 – 21/03/2022
Registered Address:
Cornerstone Telecommunications, Infrastructure Limited,
Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.
Registered in England & Wales No. 08087551.
VAT No. GB142 8555 06

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

3. Proposed Development

The proposed site:

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

As part of Telefonica's (VMO2) continued network improvement program, there is a specific requirement for a new installation which will provide additional capacity into the network at this location to provide improved 2G, 3G, 4G and new 5G coverage and capacity, ensuring that this area of West Green has access to the latest technologies.

The application site is located on land adjacent to Broadwater Lodge on Higham Lodge opposite the junction with Clonmell Road to the south. The surrounding area is primarily residential in character with allotments and Lordship Recreation Ground being located to the north west and Broadwater Lodge located to the rear.

The application site is located within the public highway to the rear of the footway. A number of vertical elements including lighting columns and road safety signage together with street trees are located in the immediate area.

The site is not within in a Conservation Area or within any other Article 3(2) land or within the setting of a listed building.

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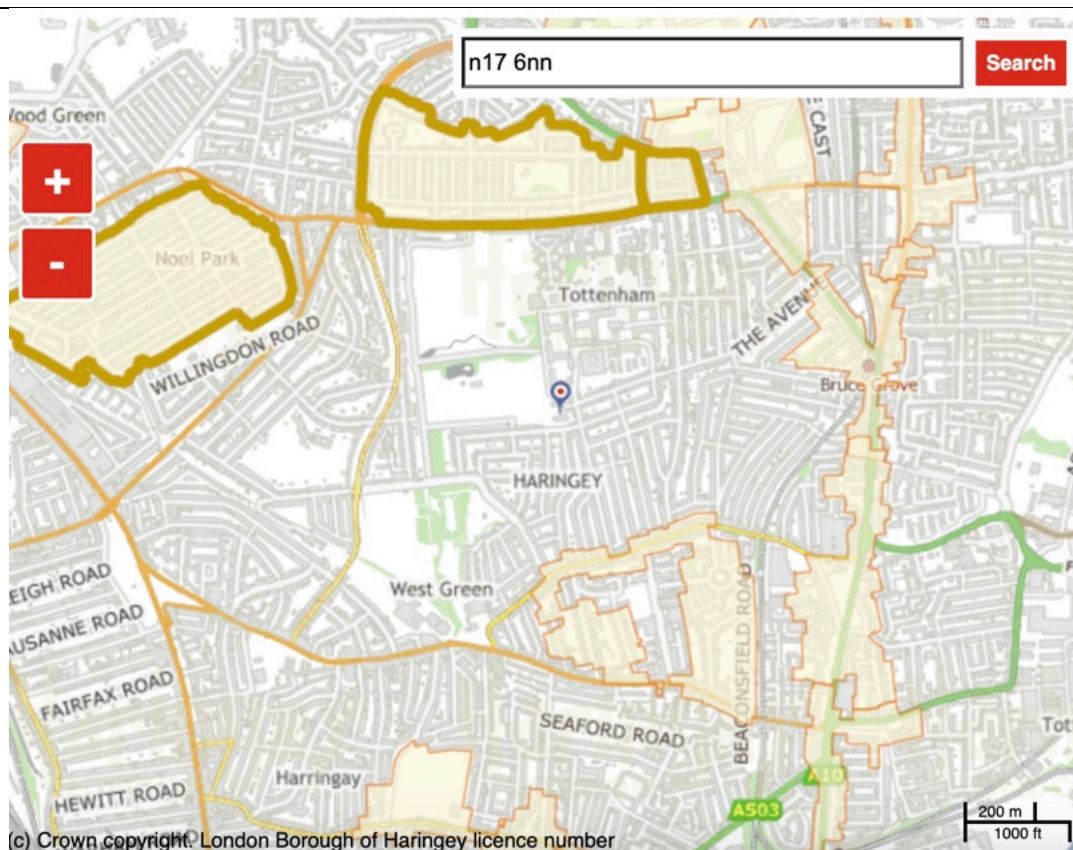


Image 1: Application site in relation to Conservation Area's

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Image 1b: The application site looking west from junction with Clonmell Road (Source: Google Maps)



Image 1c: The application site from Higham Road (junction with Dunloe Avenue) looking east towards the application site (Source: Google Maps)

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Image 1d: Aerial view of the application site (Source: Grid reference finder)

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

The operator is seeking to provide 2G/3G/4G and new 5G coverage and capacity to the surrounding area as well as new 5G services for Telefonica (VMO2) to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

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. New 5G service provision will bring faster, more responsive and reliable connections than ever before.

Type of Structure (e.g. tower, mast, etc): Orion

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Description:	
The proposed installation of 20m streetworks pole, supporting 6 no antennas, 2 no dishes and the addition of 2 no cabinets together with ancillary development thereto.	
Overall Height:	20.00m Metres
Height of existing building (where applicable):	N/A
Equipment Housing: 1 x York Cabinet	
Length:	1.900 Metres
Width:	0.660 Metres
Height:	1.750 Metres
Equipment Housing: 1 x Shire Cabinet	
Length:	1.1050 Metres
Width:	0.660 Metres
Height:	1.750 Metres
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Grey (RAL7035)
Equipment housing – type of material and external colour:	Fir Green (RAL 6009)

Reasons for choice of design, making reference to pre-application responses:
Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (Paragraph 126) National Planning Policy Framework (Revised). It states: <i>'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'.</i> In keeping with the National Planning Policy Framework (NPPF) guidelines of using: "high quality communications infrastructure", the proposed design has been selected to minimise visual impact upon the surrounding environment. 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.

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In terms of setting, given that the subject site is located on the public highway, a street furniture style development has been deemed to be most suitable type of base station as this is the most accepted design for urban, suburban and rural roadside locations throughout the UK.

The operator carefully considered the design of the proposed column. The operator is proposing the most sensitive design currently available to them which will provide the necessary coverage and capacity to the surrounding area. Due to all the technologies that will be available at this location, 2G, 3G, 4G, 3 no antennas need to be installed at the bottom of the slim-line monopole. 3 no 5G antennas will be located at the top of the column. These antennas will provide the latest 2G, 3G, 4G and 5G service provision to this area of West Green. The antennas are unshrouded for technical reasons. Thus if the column were to be any lower, the antennas would not be able to clear the trees and as such would not be able to operate effectively.

The proposed height at 20.00m is essential in order to clear the urban clutter in the area and provide infill coverage to the target coverage area.

The pronounced headframe (at 580mm diameter) is essential in order to fit all the operator's multi technology antennas within the same installation. This is the slimmest design possible which will enable all technologies to be supported from this site. If the column and headframe width were to be any slimmer then the technology would not fit in the one column. Similarly, if the column were to be a uniform width throughout then the overall width would have to increase which would appear more visually prominent in the streetscene, than the proposed design.

The proposed design is more visually sensitive and much easier to assimilate into a streetscene than lattice towers or unshrouded pole designs with bulky headframes. These traditional designs are preferred by operators as they are structurally capable of hosting more equipment and give greater scope for antenna orientation and are thus more efficient structures. However, such designs would appear alien in this location. Therefore, the operator has compromised on obtaining maximum coverage in order to better assimilate in to the streetscene. Indeed, as previously stated street poles have been successfully assimilated into the streetscene over recent years.

The design of the column resembles as closely as possible the other existing vertical structures within the immediate area including street lighting columns and telegraph poles. These vertical structures will help the proposed radio base station assimilate with the surrounding area.

The operator has therefore carefully considered the design of the proposed column. The operator is proposing the most sensitive design currently available to them which will provide the necessary coverage and capacity to the surrounding area. Due to all the technologies that will be available at this location, 2G, 3G, 4G and 5G, 6 antennas need to be installed at the top of the slim-line monopole.

The mast will be coloured grey to blend in with the existing street furniture and minimise the impact upon the urban streetscapes. The cabinetry will be coloured green. Although it can be coloured any other colour the LPA consider appropriate.

The proposed pole will ensure mobile telecommunications service within this locale meet the expectation of residents, businesses and visitors, while minimising the visual impact of the infrastructure on the surrounding environment and meeting all ICNIRP certification requirements.

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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) 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. When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, Telefonica Ltd (VMO2) operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of Telefonica Ltd's (VMO2) network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. 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.	Yes	
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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

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.

There is a specific requirement for a radio base station at this location to allow Telefonica (VMO2) to provide infill 2G, 3G and 4G coverage and capacity in and around this area of West Green whilst also providing the latest 4G technology and new 5G service provision to the local area. This ensures high quality indoor service provision is maintained.

Whilst it is the case that Cornerstone remains committed to the promotion of shared infrastructure and maximising opportunities to consolidate the number of base stations required in operating a shared single grid network to provide 2G 3G and 4G coverage, this can no longer be the case with all sites for the provision of 5G service.

Mobile connectivity and service is required where customers live, work and play. 5G coverage and superfast mobile broadband data capacity demand will continue to increase exponentially with the introduction of IoT (Internet of Things), machine to machine connectivity, automated transport/industry and other 'smart' applications. To this end, the existing shared infrastructure within the built environment has had to be reviewed and adapted as appropriate.

It is critical to understand that the UK's four Mobile Network Operators (MNOs), including Vodafone and Telefonica (VMO2), all utilise different technology spectrums to provide their mobile service. The spectrums the Operators utilise are allocated by Ofcom, as industry regulators on behalf of UK Government, through licence agreements with each of the individual MNOs. As such, each MNO must utilise the spectrum licenced to them. Each part of the RF spectrum has variations in terms of RF propagation. Therefore, the four individual MNO networks, and their sharing arrangements, cannot be compared directly and there will be variations in how all four networks are deployed and developed. For this reason, all MNOs, including Vodafone and Telefonica (VMO2), who continue to be competitors but share base stations where possible, have a completely different network configuration they need to fit within and build 5G service around. Therefore, the network has to be built differently, with different antennas and equipment, to take account of those spectrum and licence variations and this will lead to necessary infrastructure variations cell to cell, depending on site specific demand, local constraints and requirement. As such, the various networks will have variations in how their infrastructure is deployed and developed.

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5. Site Selection Process

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

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

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

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution. New sites are only developed where there are no viable or accessible alternatives or it is the local planning authority's preferred approach. The feasibility of the acquisition, build and maintenance of the site also needs to be taken into account.

In accordance with the above sequential approach, the proposal is to install a new radio base station in this location to provide 2G, 3G and 4G coverage and new 4G technology and 5G service provision.

Site Type	Site Address	National Grid Reference	Reason for not choosing site
Existing base station	Corner of Keston Road and Downhills Park Road	E532690 N189630	This is the adjacent cell to the west of the application site. An upgrade of this existing site would not fill the gap in coverage.
Existing base station	Site 43443, Bruce Castle Park, Lordship Lane, London, N17 6HB	E532994 N190253	This is the adjacent cell to the west of the application site. An upgrade of this existing site would not fill the gap in coverage.
Rooftop	Grace Baptist Church, Napier Road, London, N17 6XX	E533342 N189738	A mast at this location is not viable due to a physical lack of space. Also, due to the construction of the roof there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area.
Streetworks	The Avenue Streetworks, The Avenue, London, N17 6TQ	E533199 N190062	A mast at this location is not viable due to a physical lack of space in order to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason

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Greenfield	Neighbours Fish and Chips, 153 Mount Pleasant Road, London, N17 6TQ	E533196 N190063	A mast at this location is not viable due to a physical lack of space in order to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason.
Greenfield	Miller Memorial Methodist Church, 142B The Avenue, London, N17 6TG	E533228 N190052	An installation at this location is considered to be too exposed, with limited screening and therefore too prominent in the streetscene. Other alternatives exist which are more appropriate in order to deliver the required coverage to the target area. This site has therefore been discounted for this reason.

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):

There are no specific land designations.

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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 (July 2021)

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 statues 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 innovation⁴²'...

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'.

Paragraph 203 relates to non-designated heritage assets and states a balanced judgement is required when considering harm to the significance of the heritage asset:

'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.

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

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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 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,*

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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 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,

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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 CoBP. The CoBP 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 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*

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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 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

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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

Local Policy

The Local Plan for the Haringey area comprises:

- The London Plan 2021
- Local Plan: Strategic Policies 2013 (with alterations 2017)
- Development Management Development Plan Document (DPD)

The London Plan 2021

The London Plan 2021 is the new Spatial Development Strategy for Greater London and was adopted in March 2021 and is now part of the statutory development plan. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. Chapter 1 of the London Plan deals with 'Planning London's Future - Good Growth'. Para.1.0.1 relates to 'Good Growth' that is *"socially and economically inclusive and environmentally sustainable and underpins the whole of the London Plan and each policy. It is the way in which sustainable development in London is to be achieved"*.

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

'Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:'
'... C provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation

D seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city'

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'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. The upgraded site will ensure good quality critical infrastructure to support strong inclusive communities and contribute to economic opportunities and an inclusive London.

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

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

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

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

The right infrastructure is also required to help businesses succeed across London. The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processes, opening up new markets and allowing more flexible working. Convenient transport connections and street, rail and waterway networks that allow the efficient movement of goods and people are also vital, alongside the schools, healthcare facilities and other amenities that employees need to be healthy and productive.'

GG5 'Growing a good economy' states:

To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:
'... D ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth

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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

- 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

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).

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

Local Plan: Strategic Policies 2013 (with alterations 2017)

Haringey's Local Plan: Strategic Policies was adopted by the council in 2013, to replace the Unitary Development Plan (UDP) - with subsequent alterations adopted on the 24 July 2017. The purpose of the document is 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 including high-level strategic policies used in determining planning applications.

Vision Statement for Haringey in 2026

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HARINGEY'S GROWTH

The different aspects of growth have varied across different locations in the borough. Haringey Heartlands and Tottenham Hale are successful new mixed communities with high quality social and community infrastructure. Wood Green Metropolitan Town Centre has continued to thrive with its mix of retail, leisure and cultural uses and has become an attractive place to live. Across the borough, neighbourhoods have benefited from preserving their historic character and improving areas where required, such as estate regeneration.

Haringey has a diverse growing population and a diverse landscape, embracing the Edwardian sweep of Muswell Hill, the colourful spectacle of Green Lanes, the panoramic hill top views from Alexandra Palace and the wide vistas of Tottenham Marshes and the River Lee. The uniqueness and distinctiveness of our varied neighbourhoods captures the essence of Haringey as a place to live, work and visit.

ENVIRONMENTAL SUSTAINABILITY

Growth in Haringey is now managed to support sustainable communities. Growth is environmentally sustainable in its minimisation of the borough's contribution to climate change through location and design in the built environment, the promotion of reducing, reusing and recycling as a way of life, encouraging energy efficiency and using renewable energy, and by using and promoting sustainable travel modes and patterns. Haringey has a network of cycle lanes and secure bike parks, encouraging greater levels of cycling and walking, while also promoting the use of public and greener transport.

ECONOMIC GROWTH

Haringey is a socially inclusive borough that tackles poverty and disadvantage. Haringey's economy is sustainable in terms of economic growth, and makes the most of employment opportunities. More people are engaged locally in employment, training and education. Haringey has exploited its strategic location and has increased inward investment to link people to areas of employment. The food and drink, clothing, information, communication and technology and the creative and cultural industries all form key parts of Haringey's 'unique selling point' with Haringey's diverse and entrepreneurial population creating robust markets for their goods and services.

A SAFER AND HEALTHIER HARINGEY

Haringey is a safe borough where people feel secure and confident and can enjoy all the wonderful spaces and places the borough has to offer. Crime and the fear of crime have reduced. Haringey has high quality buildings and public realm guided by international and national best practice. The borough's open spaces are of high quality, accessible for all residents which are safe and secure, and provide appropriate facilities. The heritage and historic spaces, structures and buildings of Haringey are protected and maintained for existing and future generations to be proud of.

Haringey has a healthy population. All residents have access to health and education facilities and social and community services, and enjoy a healthy lifestyle and improved quality of life and well-being which is measurable across the borough.

CIVIC ENGAGEMENT

Haringey has more opportunities for civic engagement and volunteering, drawing in local people to work together to tackle social isolation and exclusion.

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Policy SP0 relates to a '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 (NPPF). The Council will always work proactively with applicants 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 Haringey. Planning applications that accord with the policies in Haringey's 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 of the NPPF taken as a whole; or ▪ Specific policies in the NPPF indicate that development should be restricted'.

SP11 relates to 'Design' and states 'All new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. To achieve this all development shall:

- Be of the highest standard of design that respects its local context and character and historic significance, to contribute to the creation and enhancement of Haringey's sense of place and identity;
- Ensure impacts on health, climate change, natural resources and biodiversity are minimised by adopting and improving sustainable design and construction techniques;
- Incorporate solutions to reduce crime and the fear of crime, such as promoting social inclusion; creating well-connected and high quality public realm that is easy and safe to use; and by applying the principles set out in 'Secured by Design' and Safer Places;
- Promote high quality landscaping on and off site, including improvements to existing streets and public spaces;
- Seek the highest standards of access in all buildings and places; and
- Ensure buildings are designed to be flexible and adaptable – and able to integrate services and functions.

Applications for tall buildings will be assessed against the following criteria:

- an adopted Area Action Plan or existing adopted masterplan framework for the site and surrounding area;
- assessment supporting tall buildings in a Characterisation Study which should be prepared as supporting evidence for all AAP areas;
- compliance with the Development Management Policies criteria for Tall and Large Buildings siting and design; and
- compliance with all the relevant recommendations as set out in CABE / English Heritage "Guidance on Tall Buildings", 2007'.

Development Management Development Plan Document (DPD)

The council has prepared a Development Management Development Plan Document (DPD) which sets out planning policies to help determine which developments are granted planning permission in Haringey. It was adopted by the council on the 24 July 2017.

Policy DM1 relates to 'Delivering High Quality Design'

Haringey Development Charter

All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:

a Relate positively to neighbouring structures, new or old, to create a harmonious whole;

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b Make a positive contribution to a place, improving the character and quality of an area; c Confidently address feedback from local consultation; d Demonstrate how the quality of the development will be secured when it is built; and e Are inclusive and incorporate sustainable design and construction principles.

Design Standards

Character of development

B Development proposals should relate positively to their locality, having regard to:

- a Building heights;*
- b Form, scale & massing prevailing around the site;*
- c Urban grain, and the framework of routes and spaces connecting locally and more widely;*
- d Maintaining a sense of enclosure and, where appropriate, following existing building lines;*
- e Rhythm of any neighbouring or local regular plot and building widths;*
- f Active, lively frontages to the public realm; and g Distinctive local architectural styles, detailing and materials.*

Landscaping

C Development proposals shall demonstrate how the landscaping and planting are integrated into the development as a whole. The Council will expect development proposals to respond to: a Landform; b Levels, slopes and the fall of the ground; c Trees on and close to the site; d Landscaped boundary and treatments; and e Any other significant biodiversity (including prioritising native over invasive species) on or close to the site.

Privacy and amenity

D Development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours. The Council will support proposals that:

- a Provide appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land;*
- b Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development; and*
- c Address issues of vibration, noise, fumes, odour, light pollution and microclimatic conditions likely to arise from the use and activities of the development'.*

Policy DM3 relates to 'Public Realm'

Public Art

A Major development proposals should consider how schemes can enhance local distinctiveness and legibility through the use of public art. Where public art is provided it should be: a Agreed by the Council; b Appropriately located in a prominent location, with consideration given to fixing art to the proposed building or situated on a public space within the site; and

c Appropriately maintained. Privately owned public spaces within new development

B New privately owned public spaces should promote secure, accessible and inclusive environments that positively relate to local context and incorporate high quality design and public realm features. These spaces should be positively managed, maintained to a high standard, and public access secured.

Advertisements

C Proposals for all advertisements should be designed to a high standard and, in particular, should: a Contribute to a safe and attractive environment;

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b Be of a high quality and sensitive to its visual appearance on the building on which it is to be sited and the surrounding street scene, especially in the case of listed buildings and conservation areas; c Avoid unsightly proliferation or clutter of signage in the vicinity; d Not cause a hazard to pedestrians or road users, including by siting and design; e Be sited to avoid visual intrusion of light pollution into adjoining residential properties; and f Where appropriate, be constructed of materials and finishes which discourage both graffiti and fly posting'.

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 operational 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 DM9);

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.

E All telecommunications equipment should be removed as soon as reasonably practicable after it is no longer required'.

Policy DM54 relates to 'Facilitating Telecommunications Development' and states:

'A 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 connection 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'.

Levelling Up the United Kingdom White Paper'

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

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'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;

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,

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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.
- 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

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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:

‘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

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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 5sprinG, 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 devolved administrations to consider how best to share the insights and evaluation of the programme to help build digital skills capability across the UK'.

UK Wireless Infrastructure Strategy, April 2023

In April 2023, the UK Government published the 'UK Wireless Infrastructure Strategy'¹, a plan for delivering world-class digital infrastructure which the government identifies as an essential enabler for

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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 sets 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.

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

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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 is 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 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

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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)^[2]. 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:

"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

^[2] 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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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%).^[3]"

Therefore, without the improved network coverage and capacity that the proposed essential infrastructure will bring, Telefonica's network users living, working and travelling in the local area, and those of the associated MVNOs, will not benefit from reliable mobile digital connectivity when using their smartphones for business, education and personal purposes.

Planning Issues

The main issues arising from this prior approval notification are whether the proposed mast and cabinets due to their scale and siting would be a visually obtrusive feature which would be detrimental to the character and appearance of the area and residential amenity. Whether any perceived harm would outweigh the significant social and economic benefits associated with the increased service provision attributed to the proposal and other valid material considerations as outlined within NPPF, London Plan and Haringey Core Strategy and Development Management DPD.

Principle of Development

The principle of development has been established by the Government when the new permitted development rights came into force in November 2016 and were subsequently amended 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'.

^[3] 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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Siting

There are numerous specific constraints associated with site placement in mobile network planning as touched upon above. Notably, each radio base stations can only cover a limited geographical area known as a cell and that cells are designed to overlap to form an unbroken network.

Site placement is always critical in network planning and becomes even more so when one is seeking to provide infill coverage within an established cellular pattern. There is a very specific and unique gap in the network, like a piece from a completed jigsaw would, which needs to be filled which will enable users living, working within and passing through that area to use their mobile phones and other wireless devices. This places even greater limitations on the potential siting opportunities as many locations will not enable this specific gap to be adequately filled without compromising the existing network.

When seeking to identify a location for a new base station site in this instance, the applicant's Agent applied the sequential site selection process, as is advocated within the Code of Practice.

The applicant's take guidance from it in the siting and design of all their new sites and upgrades. This meant that the initial cell search investigation focused on an exploration of existing telecoms sites and then buildings and other suitably tall structures that may have been appropriate for the accommodation of the 'infill' apparatus, subject to the technical constraints placed upon operators, and planning constraints imposed by the development plan. Once these had been exhausted, locations for a new base installation were explored.

As set out above siting considerations for a new ground-based mast include:

- Height of the site in relation to the surrounding land
- Topography of the site and vegetation
- Openness and visibility of the site
- Designated areas
- Relation to existing base stations
- Proximity to residential properties

The main instigator for a new installation at the application location follows the requirement for Cornerstone and Telefonica (VMO2) of progressing a new site in the West Green area of Haringey for a radio base station capable of providing their latest 4G and new 5G technologies. Residents and businesses in the area currently do not have reliable mobile digital connectivity which is contrary to the Government's 'Levelling Up' agenda.

The application site is required to provide 'infill' coverage to support the applicant's adjacent sites and improve this area of poor mobile coverage and contribute to the Governments 'Levelling Up' agenda and ensure the good quality critical infrastructure to support strong inclusive communities and contribute to economic opportunities and an inclusive London to deliver the Mayor of London's London Plan.

3G and 4G signals by their very nature (as they carry high data rates) do not penetrate over long distances, just a few hundred metres, 5G even less so depending on the topography of the land, building clutter and vegetation including trees in the area which can reduce their effectiveness. Therefore, the new 5G radio base station needs to be close to their customer demand which in this case is the West Green area of Haringey.

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The applicant's have exhausted all feasible potential alternative siting options within and in reasonable proximity to the cell area. The application site remains the best available solution for an 'infill' installation to ensure continued coverage provision in this area. The comprehensive efforts undertaken during site selection and lack of any more suitable, feasible option is considered material to the assessment of the application proposals.

The siting of the proposed radio base station has been carefully considered. To this end, the equipment has been located to within a wide grass verge where it will be located adjacent to trees and a streetlighting column. This is in line with Policy S16 of the London Plan and Policies DM1, DM3 and DM54 of the Development Management DPD.

There are a number of vertical structures within the immediate area, which will help the installation assimilate with its immediate environment including lighting columns, telegraph poles and associated power lines. These vertical structures are similarly designed i.e. to be simple, functional vertical structures. These structures will help the column and associated cabinets from appearing prominent in the streetscene. 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 extant policies of the London Plan and Policies DM1, DM3 and DM54 of the Development Management DPD.

The proposed equipment cabinets, 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. The operator's equipment cabinets are similar to those of other statutory undertakers which are common place in urban areas including BT Openreach and are also present in this verge. 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 green colour to blend in with the adjacent shrubs.

Furthermore, 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 design of the monopole has been carefully considered. To this end, it is a simple, functional slim-line monopole, with the main column being split in to two sections. This column width is essential in order to safely support the antennas at the top of the column. The column is proposed to be grey to blend in with the other vertical structures nearby and assimilate with an often-grey sky.

In order to reduce the visual impact on the surrounding area the antennas are proposed to be tight to the top of the column, rather than on an open head frame which would appear more prominent in the streetscene. Therefore, the operator has compromised on optimising the coverage in this area of West Green in order to minimise the environmental impact, by shielding the antennas. However, meaningful coverage will still be able to be provided to the target coverage area, hence the submission of this prior approval application in this location to maintain high quality indoor 2G, 3G and 4G service provision to be linked into the operator's network configuration as well as providing new 5G services.

The presence of the linear structures including the lighting columns, telegraph poles and the mature trees in the immediate area will ensure that the proposed column will not appear incongruous within

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the streetscene. Thus, there will be no detrimental loss of visual amenity to the area or environmental intrusion in line with the London Plan and Development Management DPD.

The telecommunications mast is proposed to be a slim-line simple, vertical, functional structure. The column is relatively slender and similar in design to the existing vertical structures in the immediate area on the public highway albeit taller in height. As a result, this installation would not appear incongruous within the streetscene in line with the requirements of London Plan and Development Management DPD.

The installation of this 20.0m slim-line column designed to be as similar as possible to the other linear structures found in the immediate area and lighting columns on the public highway will be no more at odds with the streetscene and character of the area than the other vertical structures within the immediate locale.

It is accepted that the height of the proposed installation is taller than other pieces of surrounding linear structures, but this in itself is not a valid reason to conclude that it is not appropriate at a specific location. Indeed, Inspectors at appeal have noted that by their very nature to be effective masts are required to be taller than surrounding structures.

Telecommunications apparatus by their very nature must be taller than surrounding built and natural form to ensure its efficient operation. The Code of Practice explains this requirement fully in paragraph 3.1, *'radio signals operate like light and must "see" over the target coverage area...'* To suggest that it is inappropriate development because it is taller than adjacent lighting columns or road signage is no more relevant than suggesting that street lighting columns are inappropriate because they are taller than road signage or traffic lights. They are all essential pieces of infrastructure within a streetscene that carry out differing functions and therefore cannot be considered on the same merits. Should a street lighting column be capable of the provision of high quality 2G/3G/4G/5G telecommunication services then this would be a reasonable consideration, but this is clearly not the case. As such, the proposal should not be considered negatively due to it being taller per se than other vertical structures. Reasonable consideration of the proposal in the context of nearby street furniture can only conclude that the presence of other vertical structures in the immediate area only seeks to provide a setting wherein a base station may appear more congruous from which to provide an important service to a wider area.

The proposed height at 20.0m is essential in order to clear the mature trees in the area and provide infill coverage to the target coverage area of Higham Road and wider area of West Green.

If the column and headframe were to be any slimmer, then the required technologies would not be able to fit in the same installation and an additional radio base station would be required which would be contrary to national planning guidance. It would also not be structurally capable of supporting all the technologies including the latest 4G and 5G service provision. If the column were to be the same width throughout then it would have to be as wide as the top of the column. This would appear more visually prominent in the streetscene than the current proposals.

The equipment cabinets are designed to appear like other statutory undertakers equipment cabinets often found in urban areas. They are small for telecommunications equipment. The proposed equipment cabinets are the least amount of cabinets that can be installed in this location and enable the radio base station to operate. If the number of cabinets were to be reduced then there would not be sufficient room to house all the operators equipment. In any event, these cabinets are permitted development under the operators permitted development rights. They have only been included in the description and on the plans in order to remain fully transparent. In order to help blend in with their

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surroundings they are proposed to be coloured green, although they can be coloured any other colour that the council considers to be appropriate.

The design of the radio base station is one of the most sensitive designs available to the operators, designed to resemble typical existing urban linear street furniture, and that will allow two telecommunications operators to operate from a single site. This is in line with the requirements of NPPF which supports equipment which is sympathetically designed and camouflaged where appropriate [paragraph 115], The Code of Best Practice as well as the aspirations of the London Plan, Core Strategy and Development Management DPD.

The proposed new site accords with NPPF because the equipment will resemble other linear structures within the area and will ensure high quality communications infrastructure is maintained in the area. Placing masts near similar structures such as telegraph poles, powerlines and road signage, utilising simple and unfussy designs is acknowledged in the Code of Practice on Wireless Network Development in England to be less likely to dominate and be in discord with the streetscene and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area.

Lack of Coverage – Material Consideration

In accordance with the NPPF, the proposed installation is significant to enable continuous coverage of the telecommunication network, ensuring that this area of West Green continues to get the mobile coverage it needs for Telefonica (VMO2) customers as well as new 5G coverage. It will also maintain and improve coverage for the Mobile Virtual Network Operator's (MVNOs) which use the Telefonica (VMO2) network. So, the proposal will not only provide improved and new service provision for one operator but those who buy network space off them. This will provide a choice for those customers who consider the level of coverage in their area when selecting which operator they agree future contracts with.

The current proposals 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. In the justification to Policy SI 6 of the London Plan it acknowledges that maximising access and maintaining choice in both telecommunications and transport should enable 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. The proposed radio base station enhancing existing service provision and providing new 5G technology will support this policy justification as well as the Mayor of London aspirations.

Trials have already begun across the UK to demonstrate the potential of 5G and how it can improve and drive productivity and efficiency. In June 2019, West Midlands 5G partnered with BT and University Hospitals Birmingham to trial the UK's first 5G Connected Ambulance. Real-Time communications between the paramedics and the hospital doctors enabled the effective diagnosis of the patient at an early stage of care. The trial showed how a paramedic performed a remote-controlled ultra-sound scan on a patient in an ambulance over a public 5G network. These trials show how digital connectivity and technology can reduce patient waiting times and save lives (Source: WM5G).

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.

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Without this new 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. They would also not be able to access the 5G network, a demand which is increasing rapidly as customers update their handheld devices to ones that are 5G compatible, and one that the Mayor of London is embracing with its ambition for resilient digital connectivity. If the 5G network is not available then the customers' would not be able to utilise these handheld devices for the purposes in which they were purchased. This would be contrary to the aspirations of Central Government which aspires to everyone having access to the superfast highway network wherever they are and being a world leader in 5G. The justification to Policy SI6 of the London Plan and Policies DM1, DM3 and DM54 of the Development Management DPD also notes that it is the intention of the Council to achieve a balance between the need for a development and environmental considerations.

The proposed 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, a key ambition of the NPPF and Mayor of London aspirations. The radio base station will support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders (every missed NHS appointment costs the NHS approximately £160 source: NHS), reminders to take medicines, make appointments etc. As well as assisting hospital outpatient appointments and emergency consultations carried out remotely via video link, connected ambulances, live streaming of CCTV footage etc.

By enhancing the 2G, 3G and 4G service provision to the surrounding area and providing new 5G coverage into the operators' network, this would fully support London Plan aspirations.

The Councillor's Guide to Digital Connectivity notes that a survey conducted by the Confederation of British Industry found that 81% of firms said that they see more reliable mobile connectivity as essential. Studies have also shown that mobile broadband is associated with positive impacts nationally, such as higher GDP and increased employment.

Therefore, the Government fully supports high quality communications infrastructure, even more so with the advent of 5G. Indeed, The NPPF continues to strongly support telecommunications connectivity and states at paragraph 114 that local planning authorities should support the expansion of electronic communications networks. It acknowledges that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.

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

To emphasise the Government's strong support for 5G and the important role that local authorities have in supporting its roll-out, Matt Warman former Minister for Digital Infrastructure wrote a letter to all Local Authority Chief Executives, CCing all Local Authority Chief Planning Officers highlighting their role in facilitating the roll-out of next-generation infrastructure and prevent misleading claims becoming a barrier to rollout. The letter (see Appendix 2 for a copy) highlighted the growing importance of digital connectivity:

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

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The letter goes on to state the Government ambition for 5G roll-out:

'The Government is committed to extending mobile network coverage across the UK and providing uninterrupted mobile signal on all major roads, and our ambition is for the majority of the population to have access to a 5G signal by 2027'...

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

The planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliable on mobile connectivity. Following our consultation on the principle of reforms to permitted development rights to support 5g deployment and extend mobile coverage we recently published a technical consultation on the details of our proposed changes.

The National Planning Policy Framework ("The Framework") for England states that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology, such as 5G.

An installation in this location will ensure the lack of new 5G high quality service provision is filled and will enable Telefonica (VMO2) and MVNOs who buy network space off this operator to maintain access to their handheld devices wherever they are for the purposes in which they were purchased. This is fully in line with the Government's aspirations that everyone has access to the superfast communications network, the NPPF, London Plan and Haringey Core Strategy and the Development Management DPD.

Access to the internet in whatever medium now impacts every facet of our lives but only benefits those who can access and use it. The benefits of internet connectivity are key for both residents and businesses alike and a new radio base station in this location providing the latest 2G, 3G, 4G and 5G technologies will support the Mayor's aspirations to be a world-leading digital city and one which promotes the growth of the digital sector, increasing digital inclusion, so all people can access services, education and training.

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

The Code of Practice acknowledges that there will be times when there is a need for a new radio base station, where sites have been lost, where areas have limited or no coverage and where coverage and capacity need to be enhanced. This application is one such example where there is a need to enhance 3G and 4G provision and provide new 5G services within this area. Currently there 5G coverage is non-existent in this part of Higham Road, West Green.

In the Code of Practice it acknowledges *'the pressure on networks to upgrade and improve networks through changes to existing sites and the development of new sites is constant. With the increasing consumer demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity. This is due to the ever increasing demand for data hungry*

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applications to be available to a range of connected devices, such as smartphones and tablet computers. However, The Code notes that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which they rely'. Therefore, there is a significant need to locate the equipment in this area.

The operator not only has a license requirement to provide a certain level of 2G/3G/4G coverage to the population the operators' are obliged to meet the growing consumer demand for 5G coverage, especially as more people are purchasing 5G enabled devices, in line with their license obligations and the operators competitive market driven "requirement" to provide a high quality service. Customers expect to be able to access their portable hand held devices wherever they are, whether that be indoors or outside. There is currently no 5G service provision that is provided by Telefonica (VMO2) in this cell area. The least impact on the surrounding environment in order to fill this gap is by installing a new radio base station at the application site.

It is therefore imperative that the operator continues to invest in ensuring that the latest technologies are available on its network, so that customers are able to continue to use their handheld devices wherever they are, for whatever reason, for the purposes in which they were purchased.

Economic and Social Benefits

The NPPF strongly supports sustainable development as does the London Plan, Core Strategy and Development Management DPD.. 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 providing new 5G services will fully meet this national policy objective. Continuing to transform the digital connectivity of the city-region to drive economic growth and innovation, working to meet national targets of full roll-out of 5G technology for most people by 2027 will comply with the ambitions of the of the London Plan.

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.

The enclosed Cornerstone Local Authority Engagement Brochure September 2020, emphasises further the benefits of high quality mobile connectivity including: promoting economic growth by attracting

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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.

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 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'.

Providing improved 3G and 4G coverage and capacity and new 5G service provision in this area will fully meet paragraph 38 of the NPPF, the Core Strategy and London Plan aspirations. These strategies and the Framework also support strengthening digital and data infrastructure (including 5G), and using data to help address challenges.

The social and economic benefits are a significant material consideration which should be weighed against the minor amendments of the existing 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 UK's 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 Government is committed to extending mobile geographical coverage further across the UK, with

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continuous mobile connectivity provided to all major roads and to being a world leader in 5G. This will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage. As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver prosperity at the local level and enable all places to share in the proceeds of growth.

The Government is determined to ensure the UK receives the coverage and connectivity it needs. To this end, the Government wants to be a world leader in 5G, the next generation of wireless connectivity, and for communities to benefit from the investments in the new technology.

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

The Local Government Association (LGA) has produced a Councillor's Guide to Digital Connectivity and sets out some of the benefits of 5G technology:

- Faster mobile broadband and a more consistent experience in congested areas with a very high number of devices.
- Industrial applications, enabling businesses to improve their productivity, for example through predictive maintenance and real-time analytics.
- Internet of Things (IoT) services, many of which will help council's and businesses deliver services more efficiently including:
 - Transport and logistics: connected parcels and fleet tracking.
 - Health and social care.
 - Environmental monitoring: sensors monitoring air quality and water pollution in real-time.
 - Smart agriculture and smart animal farming, smart retailing.
 - Connected and autonomous cars: allowing cars to communicate with each other, other road users and even the road infrastructure.

Further to the Government's commitment to improve connectivity, on 24th November 2016 the new permitted development rights for telecommunication operators came into 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

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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 replacing, maintaining and enhancing high quality 2G, 3G and 4G coverage and capacity in this part of West Green as well as providing new 5G in this area, where the social and economic benefits will outweigh the environmental considerations in line with Policy SI6 of the London Plan and Policies DM1, DM3 and DM54 of the Development Management DPD.

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 a new radio base station in this part of West Green to provide 2G, 3G, 4G and 5G is significant.

On the 23 September 2020, the former Digital Infrastructure Minister Matt Warman MP spoke about the ongoing work by the Government and telecoms industry to boost the UK's world class digital connectivity in his keynote speech at Connected Britain 2020²

...'I'd like to take this opportunity to thank everyone in the industry for their tireless efforts at keeping us all connected through an unprecedented period of disruption.

...COVID has altered the way we live, work and most importantly, stay connected with our family and friends. The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown – and is now more important than ever as we head into recovery. Many of these changes – such as increased working from home – will stay with us for the foreseeable future.

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

That's why I'm committed to working with you to ensure the entire nation has access to world-class, next generation gigabit connectivity that is secure and resilient enough to deal with all sorts of future challenges.

This Government is ambitious for the UK's digital infrastructure.

² https://www.gov.uk/government/speeches/matt-warman-keynote-speech-at-connected-britain-2020?utm_source=01ad07cc-6884-4d9b-a0ca-8c212f0a4289&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate

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And because we know that more citizens are increasingly living their lives online, we will be one of the earliest adopters of 5G coverage, with the majority of the population able to access 5G by 2027.

...We know how important local authorities are to the delivery of digital infrastructure, which is why I have written to them, together with the Local Government Minister, to outline how they can work more effectively with the industry...

....Turning to 5G, while the commercial rollout of 5G continues at pace, we're pushing ahead with plans to make sure all sorts of industries benefit from this game-changing technology.

....since the start of the 5G Testbeds and trials programme, we've now funded 24 5G testbeds across the UK. Between them, those testbeds have trialled almost 70 different 5G technologies, products and applications. And more importantly than ever, we are investing in a range of sectors to foster, build and grow 5G cross wider industry...

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

This Keynote Speech by Matt Warman MP highlights the importance that Government places on 5G and advanced, reliable, high quality 5G technology. To prevent this technology from being brought into the area would be contrary to the Government's key aims.

On the 1 October 2020, as part of the Speed up Britain Campaign, The Centre of Policy Studies Report published '*Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution*'³. The report identifies what the 5G opportunities are and what the Government needs to do so we can all benefit from this vital new technology. It states that delays to the rollout of 5G could cost the country tens of billions of pounds in lost economic output. The former Government advisers Alex Jackman and Nick King argue that Government's 'levelling up' agenda and the UK's recovery from the COVID-19 pandemic is at risk without a faster 5G rollout – to the tune of £41 billion.

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

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

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

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

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

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

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

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

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

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

The Government's ambition for the majority of the UK population to have access to 5G signal by 2027 was repeated in the letter to all the Councils Chief Execs and Chief Planning Officers from the Minister for Digital Infrastructure Matt Warman. This letter also acknowledged that the demand for data is increasing rapidly and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality mobile connectivity to stay connected and for businesses to grow.

The proposed installation in this location will allow the operator to provide new and improved high quality 2G, 3G and 4G coverage and capacity and new 5G service provision supporting the Government's aim of '*focusing on ensuring that everyone is connected to the information superhighway*' and '*for the majority of the population to have access to a 5G signal by 2027*'. This fully meets the aspirations of the NPPF, and the London Plan and Development Management DPD.

An installation in this location providing 5G will ensure that the expansion of the electronic communications network is facilitated and that high quality communications infrastructure is provided to the immediate area.

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:

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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

- 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.

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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

- 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 Socio-Economic Benefit:-

Education

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

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

Health

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

5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds

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(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

The proposed site has been carefully sited within the public highway. There are other vertical structures in the vicinity of the proposed installation including lighting columns and telegraph poles. Together with substantial mature trees in the public highway these will provide some context. As this is a prior approval application, the Government confirms that this is permitted development, akin to outline planning permission, with just the finer details of siting and appearance to be considered by the local planning authority. The vertical structures help the proposed installation assimilate with the streetscene and not appear alien in the immediate area.

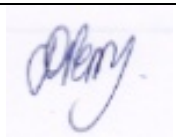
To ensure the effective operation of the site within the network, and to ensure compliance with ICNIRP requirements, the minimum height of pole that could be deployed at this location is the proposed 20.0m installation.

Site selection was progressed in accordance with the applicants licence obligations, advice in the NPPF and the Code of Practice and represents the least environmentally intrusive, technically suitable, available option. It has been demonstrated that there are no more suitable sites that could provide this essential service to this cell area.

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 is a strong material consideration in the determination of this application. It is fully supported by the NPPF, the London Plan, Core Strategy, Development Management DPD. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area or residential amenity.

Confirmation that submitted drawings have been checked for accuracy

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Consultant Planner	Town	on behalf of Cornerstone	

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