

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Watermead Way	Site Address:	Land at Watermead Way Marigold Road Northumberland Park London N17 0UR
National Grid Reference:	535145, 191112		
Site Ref Number:	BTEE-10101159	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

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

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why: None available. Public access system checked.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	27/03/2026
Name of contact:	N/A
Summary of outcome/Main issues raised: A pre-application consultation was issued to the Council on the above date and included a cover letter explaining the background to the proposal, i.e., that the existing base station that provides the operator in question with network service has been the subject of a 'Notice to Quit' (NTQ) and a replacement solution is now being sought. The submission also included a written description of the proposed development, draft plans and a consultation plan. Due to the planning history and the simplistic nature of the proposed development, no pre-application fee was paid, and no feedback has been forthcoming. It is now considered appropriate to proceed to planning submission stage.	

Annual area wide information to planning authority

Has annual area wide information been provided?	No
Summary issues raised:	

¹ Macro or Micro

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 following:			
- Northumberland Park Ward Councillors - David Lammy MP			
Summary of outcome/main issues raised (include copies of relevant correspondence):			
No responses have been received to date.			

School/College

Location of site in relation to school/college (include name of school/college):
N/A
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 proposed development be on a civil safeguarding area or a defence safeguarding area?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area been notified?	Yes	No
Details of response:		
London City Airport and Dyson Osiers Airstrip were consulted at pre-application stage and have been notified of this proposal. A copy has been attached		

Developer's Notice

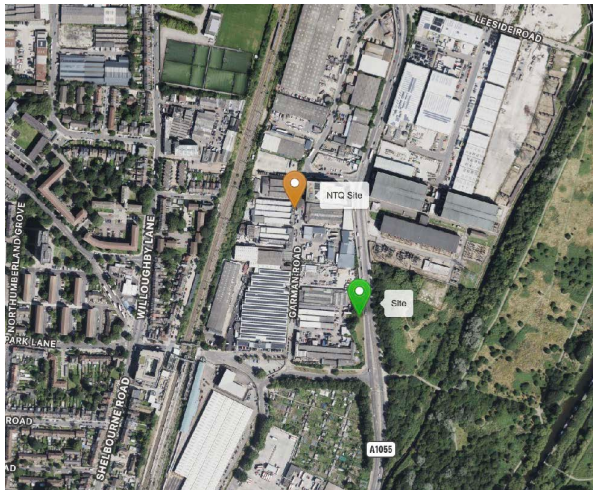
Copy of Developer's Notice enclosed?	Yes	No
Date served:	20.04.2026	

3. Proposed Development

The proposed site:
The site in question is located upon an area of grassed verge on the western side of Watermead Way, which acts as the eastern boundary to the Garman Road Marsh Lane Industrial area, the western boundary of which is formed by the Lea Valley Line, (a part of the West Anglia Main Line), north of Northumberland Park station. The Wild Marsh

West sits to the east of Watermead way with a large plot of allotments to the south, south of Marigold Road. There are no restrictive planning designations in place and there are no natural or built heritage sensitivities associated with the site. Other features of note in the general locale are the mature trees and streetlights on either side of Watermead Road, the large industrial/commercial units to the northwest and west, a pylon line to the south and east and other telecommunications infrastructure to the southwest.

The operator's existing telecommunications site that is the subject of a Notice to Quit (NTQ) is located approximately 190m to the northwest at 42 Garman Road, London, N17 0UL.



Site & NTQ Site Location



NTQ Site Photo

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

Coverage plots and the wider network

The National Planning Policy Framework states that local planning authorities should not question the need for the telecommunications development.

The proposed development will replace an existing base station, and in doing so will replicate existing coverage, improve capacity and facilitate 5G connectivity in the future. Should the LPA wish to better understand how the proposed development will provide an effective network solution and fit seamlessly into the existing and planned networks for the operator in the wider area, we would be happy to request the coverage plots be provided by the operator.

In the meantime, further technical justification is supplied later in this statement and this information provides clarification on the operational requirement and how the proposed development will address the operational need.

How mobile networks operate

The reader may be aware that cellular networks are made up of a series of individual cell areas, each of which has a base station within it to provide service to that particular area. Each base station has a maximum capacity for traffic, (i.e., the number of handset users that can connect to it at any one time), and oversubscription by users will result in poor customer connection experience such as connection failures, dropped calls and a reduction in mobile broadband data speeds for both uplink and downlink. It is therefore imperative that adequate network infrastructure is in place to cope with demand.

A good analogy for describing a cellular network is that of a patchwork quilt with each cell area being one of the many patches that are sewn together making up the network 'quilt'. The base stations themselves will require a supporting structure, such as a mast or high building, to support antennas and dish and to elevate such transmission equipment above clutter, such as tall trees and buildings and whilst taking account of topography, all of which that could impede

signal, and to ensure ICNIRP compliance. Associated cabinets for housing radio equipment and power connections are also deployed to service the antennas.

Telecommunications base stations receive and transmit to mobile devices using radio waves. The antennas operate like an aerosol spray with signal transmitted along a central orientation and dissipating with distance. Transmission dish links (which are required where fibre connections are not available) operate on a direct line of sight basis, linking with dishes on other base station sites elsewhere within the wider network. The dish or fibre links also connect the base station to a master control centre that manages the call handover process that occurs when a mobile user moves from one cell area to another, whilst also providing telemetric monitoring to ensure the site is working properly and offer remote maintenance.

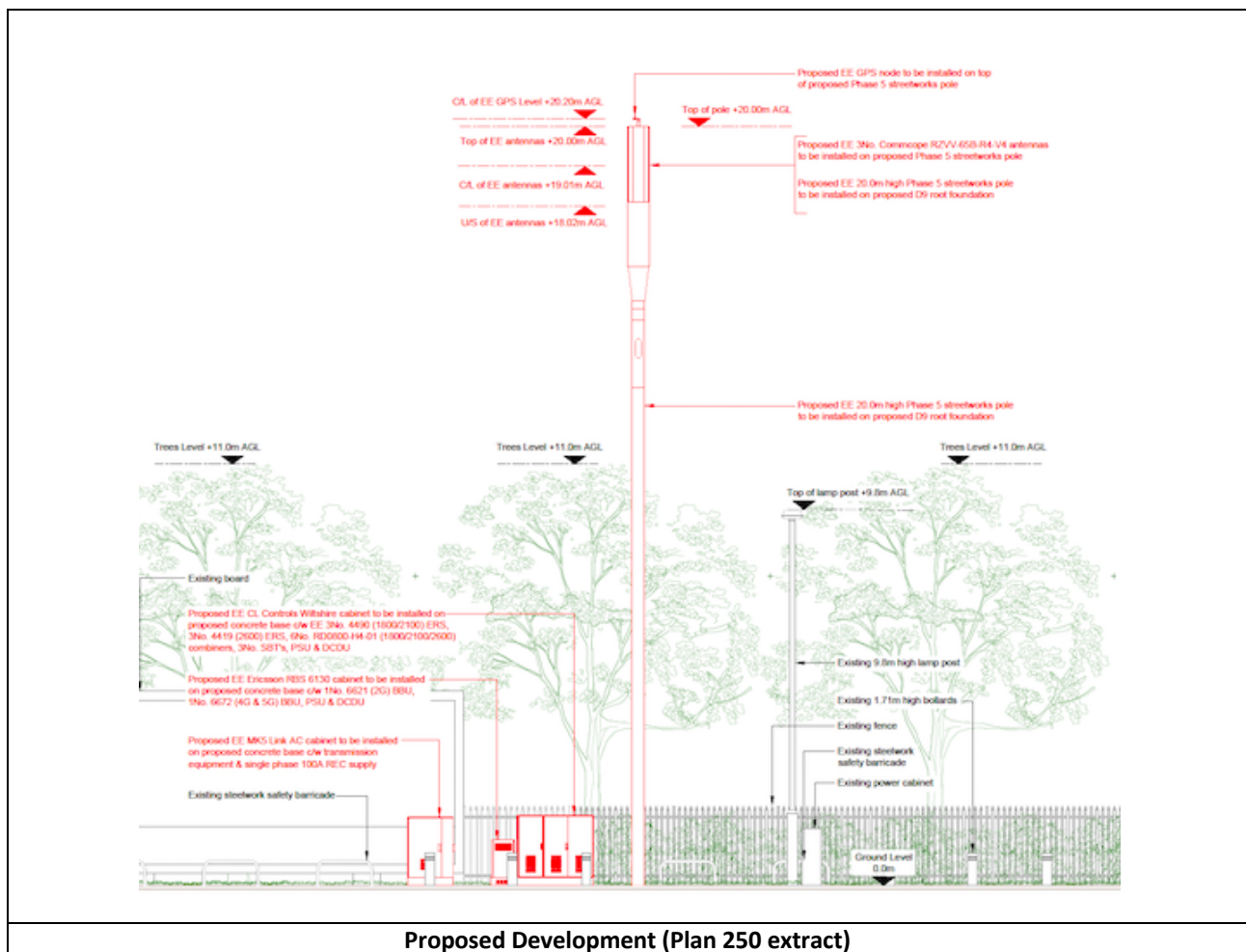
Mobile connectivity, service and capacity are required where customers live, work, travel and enjoy recreational time. In the early days of mobile communications, peripheral locations, high-level topographies and large-scale masts were often identified in order that transmission from a new base station could cover an expansive geographical area. However, whilst this approach was viable for early network generations, the number of mobile device users and the need for connectivity has dramatically increased with time, as have the advancements in mobile technology itself. Quite often it can be the case that although a degree of coverage is available in an area, demand exceeds the base station's capacity meaning that calls, text and data usage services are not available to all those wishing to use the network. As a result, the cellular network construction and operational criteria have changed over time too. Because modern networks use higher frequencies with faster data rates whilst serving significantly increased numbers of mobile device users, typical network cell areas (i.e., the geographical area targeted for coverage and capacity for which a base station development provides a solution), are now smaller in their geographical expanse and tend to be directly proportionate to the number of users within it. They are also, therefore, greater in their number with base stations operating at a lower power output than their predecessors.

It must be noted that in December 2021, the UK's mobile network operators (MNOs) confirmed to the Government (the Department for Digital, Culture, Media & Sport - DCMS) that they will not offer 2G or 3G services beyond 2033. Both EE and Three have now switched off their 3G network. Switching off these networks will free up spectrum for 4G and 5G networks, enabling customers to benefit from better, faster and more reliable services. The 2G and 3G networks rely on older technology and running them alongside newer 4G and 5G services involves increased operating costs, as well as a less efficient use of spectrum and energy.

It is critical to understand that the UK's Mobile Network Operators (MNOs) 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 radio frequency (RF) spectrum has variations in terms of frequency propagation. Therefore, each individual MNO's network, and their sharing arrangements, cannot be compared directly and there will be variations in how each of these networks is deployed and developed. For this reason, all MNOs, have a completely different network configuration that they need to fit within and build 5G service around. Therefore, the networks must be built differently, with different antennas and equipment, to take account of those spectrum and licence variations. This will in turn lead to necessary infrastructure variations on a cell-to-cell basis, depending on site specific demand, local constraints and requirement. As such, the individual networks will have variations in how their infrastructure is deployed and developed.

Type of Structure (e.g. tower, mast, etc):	
Description:	
20m streetworks pole supporting 3No. antennas, with 3No. cabinets and ancillary development thereto.	
Mast:	
Overall Height:	20 Metres
Height of existing building (where applicable):	N/A
Equipment Housing: WMK5 Link cabinet	
Length:	0.6 Metres
Width:	1.2 Metres

Height:	1.8 Metres
Equipment Housing: Wiltshire cabinet	
Length:	0.75 Metres
Width:	2.0 Metres
Height:	1.65 Metres
Equipment: Alifabs cabinet	
Length:	0.60 Metres
Width:	1.2 Metres
Height:	1.8 Metres
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel – Grey RAL7035 Can be any other colour as appropriate if requested by the LPA
Equipment housing – type of material and external colour:	Steel – Grey RAL6009 Can be any other colour as appropriate if requested by the LPA



Proposed Development (Plan 250 extract)

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

Siting and Design Considerations

It is imperative that the decision maker appreciates that matters of siting and design are intrinsically linked in that the design must reflect the setting in which it is located, balancing operational, construction and planning requirements.

When seeking to identify and design a viable base station solution, the process must take account of the following factors:

- Development must take place at a location that will effectively fulfil the operational brief, i.e., it must be located within a defined search area/target area
- The base station must have access to a power source and the cost for connection must be within budget. Excessive grid connection costs can render certain base station developments financially unfeasible.
- Reasonable access for construction, maintenance and decommissioning purposes must be achievable.
- The development must facilitate the antennas being able to 'see' the area they are to serve, i.e., the antennas will need to protrude above surrounding clutter to ensure effective signal transmission and avoid infringement. On that basis, the support structure(s) on which they are located need to be structurally sound and of sufficient height.
- The base station design must be able to achieve compliance with ICNIRP certification requirements, i.e., preventing members of the public being able to access the exclusion zones around the antennas including persons that may be working or present at height, plus allow for sufficient vertical and horizontal separation to other operator's antennas.
- The base station development must be able to connect within the wider network via a fibre connection or a transmission dish link that can achieve direct line of sight with another base station(s) in the wider network.

The operator has several options available for use in their design portfolio, ranging from building-based/other structure solutions including stub masts, pole-mounted supports, wall-mounted supports and wall-mounted antennas to ground-based mast which include lattice, monopole and street furniture style masts. Operators also have the option of attaching their antennas to existing structures, which is usually done via brackets. Design examples of each of these solutions are provided as part of **Appendix A** to this statement.

Rooftop site designs

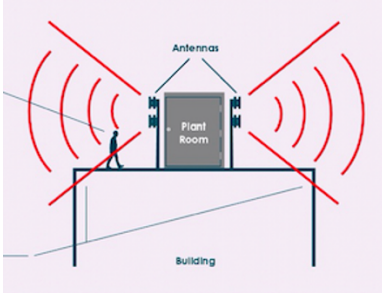
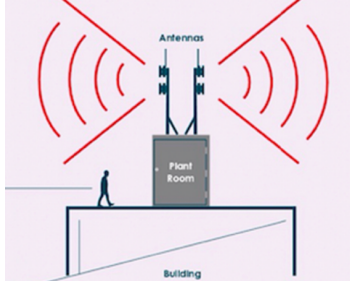
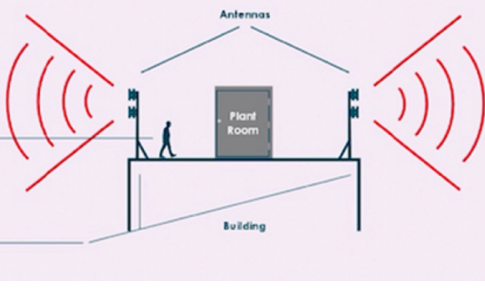
When considering the viability of potential rooftop site options or the use of another structure, one must take account of the following factors:

- Height
It is imperative that the building or structure is of sufficient height, or can accommodate an antenna support of sufficient height, to allow the antennas 'see' the area they are to serve without being impeded by clutter.
- Type of building
Not all buildings or other structures will be viable for use and operators have a duty of care to ensure that their equipment is installed safely. For example, attaching apparatus to light weight, wooden rafters and joists is simply not an option, as these are just not strong enough to support the weight of modern communications apparatus. Mounting equipment upon walls or gable ends also requires sufficient bracing to account for wind loading and stability requirements, requiring bolts through the entire wall and fastened internally via a number of back plates. This would have legal implications and would be intrusive for the occupants, both during construction and maintenance with the backplates requiring to be checked at least once a year on routine maintenance visits. Also, telecommunications equipment cannot be supported on sloping roofs due to the simple laws of physics and the fact that such roof types offer nothing for the equipment to attach to. As such the equipment would slide off under its own weight taking any roof surface with it.
- Equipment weight and structural soundness
One must consider the structural integrity of the building or structure in question and take account of the weight of the proposed antennas and the associated wind loading requirements. Each modern antenna can weigh up to 50kg and needs supported by ancillary development such as Remote Radio Units (RRU) or Mast Head Amplifiers (MHAs), each of which adds weight. One must also consider the weight of support structures, steelwork or feeder cabling that may be required, i.e., the support structure and steelwork required to accommodate the antennas at the required heights, be it a wall-mounted bracket, a wall-mounted support pole, a pole-mounted antenna scheme deployed upon steel grillage for stability or a stub mast. Please note that a 10m stub mast with headframe including the supporting steel grillage (excluding antennas, ancillary development and feeder cables), weighs approximately 4tonnes. Other weights that need to be accounted for include any cabinetry and the steel grillage upon which these elements must be secured, the feeder cables that link the antennas to

the cabinetry, and any handrailing required for health and safety purposes. Undertaking structural alterations or modifications to buildings to make them capable of accommodating the weight of a rooftop solution is not an option. Therefore, if a building fails a structural survey, then the building is not suitable for use.

- General Health and Safety**
The site in question must be capable of accommodating ancillary development required for health and safety of those that will be maintaining the site, i.e., the use of handrailing or latch systems.
- ICNIRP**
5G ICNIRP certification is more stringent than that of earlier generations of technology. To achieve ICNIRP compliance the operator must be certain that access to the antennas, be they on a rooftop or structure, is restricted to authorised personnel only. They must also consider if the available antenna locations will ensure ICNIRP compliance for neighbouring buildings, structures and accessible areas. Those maintaining neighbouring trees, structures and buildings must not be able to encroach upon the exclusion zones around the antennas.
- Signal Clipping**
Clipping occurs when the expanse of a rooftop reflects the signal transmitted by the antennas. To avoid this, antennas either need to be positioned close to the edge of the rooftop or at a greater height in a central location.

Signal Clipping and Exclusion Zones²

Scenario 1: Not viable	Scenario 2: Viable	Scenario 3: Viable
		
Antennas propagating across the rooftop make it inaccessible due to the ICNIRP exclusion zone. Signal clipping is also occurring.	The antenna height means the person is not within the ICNIRP exclusion zone and signal clipping is not occurring.	The antennas propagate outwards and those accessing the rooftop are not within the ICNIRP exclusion zone. Signal clipping is not occurring.

Ground-based site designs

When considering potential development options for new ground-based masts, there are several non-planning based general considerations that must be taken into account, namely:

- Underground utilities and services**
The presence of underground services is commonplace, especially at roadside and adopted highway's locations. Underground services can limit the usable space, preventing necessary mast foundations from being achieved, rendering developments unviable. It is not possible to build on top of underground services. Whilst it may sometimes be possible to undertake diversions of existing services to facilitate development, subject to available route/space, one must appreciate that such works come at a cost and to do so can render the base station development financially unfeasible. Not all underground services can be diverted.
- Overhead utilities and services**

² Extract taken from the Code of Practice for Wireless Network Development in England - Annex C – Rooftop Developments.

The presence of overhead services can be problematic, not just for the construction of ground-based masts, but also for their operation, as operators must ensure that ICNIRP guidelines are adhered to and that those maintaining such infrastructure do not encroach upon the exclusion zones around the proposed antennas. Again, whilst it may sometimes be possible to undertake diversions of existing services to facilitate development, subject to available route/space, one must appreciate that such works come at a cost and to do so can render the base station development financially unfeasible. Not all overhead services can be diverted.

- Presence of trees

Developments must seek to minimise the risk of conflict with the root protection areas and overhanging canopies of mature trees to limit impact upon the health of the tree(s) in question. This matter becomes more sensitive when dealing with protected trees such as those in Conservation Areas or that are subject to Tree Preservation Orders. One must also appreciate that whilst trees can provide useful screening for ground-based masts, the antennas must be of sufficient height above the trees to provide effective coverage to the target coverage area and to ensure that signal transmission is not impeded.

When considering potential development options upon adopted highways land, or at roadside or pavement locations, there are several other general considerations that must be taken into account, namely:

- Existing street furniture

The presence of other street furniture elements, such as streetlights, telegraph poles, cabinetry, signage and other street furniture elements, can limit the usable space in / on adopted verges or footways and/or create an unacceptable level of clutter. The presence of such elements can often restrict new street furniture base station development to locations that may impact pedestrian flow or impede highways safety requirements, both of which must be avoided for the development to be viable. The presence of vertical street furniture elements like telegraph poles and streetlights can be problematic as operators must ensure that ICNIRP guidelines are adhered to and that those maintaining such infrastructure do not encroach upon the exclusion zones around the proposed antennas.

- Points of access/egress to private properties

Often in urban/suburban areas, public and private properties, (both residential and other), benefit from off-street parking. It is important that the development of street furniture base stations in roadside locations does not impede their safe access or prevent appropriate visibility splays from being achieved.

- Highways and pedestrian safety requirements

When nominating a site for street furniture base station development, it is imperative that the infrastructure does not infringe upon visibility splays and meets the requirements of the Department for Transport's 'Inclusive Mobility' guidance document, for safe passage of pedestrians, including those using pushchairs and wheelchairs, see below for details. It is also important that the speed limit of the road is taken into account as this can sometimes mean a requirement for the installation traffic barriers for road safety purposes.

- Design limitations of street furniture masts

Street furniture masts are the slimmest structures available for use in operators' design portfolio and tend to be used in roadside locations and in more sensitive settings such as suburban or residential areas.

Street furniture masts can only accommodate 3No. sector antennas at any one height and these must be set at 120° separations due to being positioned in a rigid, back-to-back formation. This prevents operators from being able to orientate or tilt antennas to direct their signal to the specific areas. Street furniture mast solutions are therefore much more limited in terms of operational potential when compared with the likes of a rooftop solution, or a monopole with an open headframe or lattice structure, all of which can provide bespoke antenna layouts.

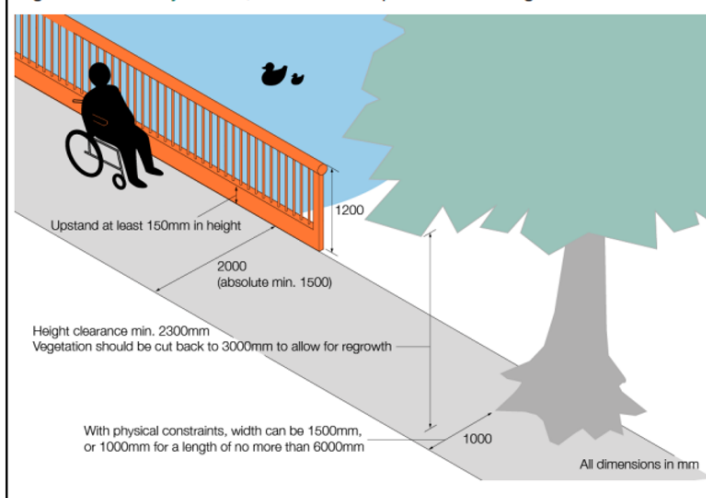
Due to the multigenerational and modern nature of the technologies involved, the operators' design portfolio no longer includes a 'camouflaged' street furniture design option, (for example, as a timber effect 'telegraph pole' solution, as was available in earlier generations of technology). This is because modern antennas are simply too big and heavy to be contained in a disguised solution. In addition,

enclosing antennas within GRP shrouding has a negative upon signal transmission of modern antennas, i.e., 5G signal is more prone to attenuation and therefore requires a higher position than earlier antenna generations to ensure the same degree of coverage is achieved.

In terms of the mast width, street furniture masts incorporate the minimum girth necessary to ensure the structural viability of supporting the transmission equipment and housing the associated feeder cables that connect these elements to the cabinetry. Please note that 4G and 5G antennas and their feeder cables are much bigger and heavier than their counterparts in earlier generations of base station development, as they carry more data. This larger equipment simply cannot be safely supported by or fit into a slimmer mast design.

Footway widths etc. 'Inclusive Mobility: A Guide to Best Practice'

Figure 1: Footway widths, headroom requirements and guardrails



Guide to Best Practice Figure 1

"Footways and footpaths should be made as wide as is practicable, but under normal circumstances, a width of **2000mm** is the minimum that should be provided, as this allows enough space for two wheelchair users to pass, even if they are using larger electric mobility scooters. If this is not feasible due to physical constraints, then a minimum width of **1500mm** could be regarded as the minimum acceptable under most circumstances, as this should enable a wheelchair user and a walker to pass each other. Where there is an obstacle, such as lamp columns, sign posts or electric vehicle charging points, the absolute minimum width should be **1000mm**, but the maximum length of such a restricted space should be **6 metres**."

The proposed design

The operational brief requires the provision of replacement coverage and capacity to the surrounding area as well as future proofing for the provision of new 5G services.

Given the roadside nature of the site in question, a street furniture style base station solution is considered the only realistic choice for use.

The proposed replacement mast is the slimmest and simplest aesthetical solution that exists in the operator's design portfolio.

3No. antennas will be installed at the top of the mast structure. The antennas are all unshrouded for technical reasons and have been designed to be as tight as possible to minimise their visual appearance. The higher the radio frequency the more signal attenuation there is with higher frequency antennas unable to operator effectively through the like of Glass Reinforced Plastic shrouding.

The proposed height at 20m height is essential to provide optimum replacement network services to the target coverage area. Due to the height of the surrounding clutter in the wider locale, the height cannot be reduced as this would prevent the base station from being able to fulfil the operational brief effectively.

The proposed mast width is the minimum required to accommodate the internal feeder cables that run from the cabinets to the antennas and to support the weight of the modern transmission apparatus.

The cabinets are designed to replicate the general aesthetic of any other statutory undertaker's equipment cabinets. These elements can be installed under permitted development rights but have been included on the plans and in the description in order to remain fully transparent. Each one has been limited in size and number to a minimum operational requirement.

The proposed mast and equipment cabinets will be coloured to help assimilate with the streetscene. However, they can also be coloured any other colour preference that the LPA consider to be more appropriate.

The proposed design is in full accordance with NPPF.

Health and Safety - including ICNIRP compliance

An ICNIRP certificate is provided as part of this application.

International Commission on Non-Ionizing Radiation Protection Declaration enclosed	Yes	No
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, EE operate their networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of EE 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.		

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

The Operational Brief

EE have previously supplied the area with network services via the existing base station located upon the rooftop of 42 Garman Road, (Cell Ref: 14318). However, the operator has been served with a 'Notice to Quit' (NTQ). Due to the resulting forced decommissioning of the site, a replacement solution is now being sought to prevent a long-term loss of network coverage.

The loss of an established site from any network can result in a loss of communications and data services locally and cause wider disruption to the network. Where sites are decommissioned, it is vitally important that effective replacement solutions are brought to fruition and integrated into the network at the earliest opportunity.

The proposed development will benefit of all current and future network users in the locale, including the Emergency Services and EE's Mobile Virtual Network Operators.

The proposed development provides the following technologies:

- 2G provision allows for calls to be made and texts to be sent.
- 4G provision allows internet access, video calling, data downstreaming, accessing social media networks and emailing to name just a few of the benefits.

It will also facilitate the provision of 5G in the future:

- 5G will deliver unparalleled speeds and capacity, with significantly reduced latency, which will be needed to deliver numerous innovative applications from autonomous cars to Internet of Things.

Emergency Services Network

Please also note that EE are the official mobile services provider for the Government's Emergency Services Network, (ESN), which is a critical national communications system that enables fast, safe and secure mission-critical voice, video and data across the 4G network. The proposed development will therefore help to give first responders immediate access to lifesaving data, images and information in live situations and emergencies on the frontline.

Operational justification

Demand for faster and more reliable mobile connectivity continues to grow, with network users now expecting high-performing mobile services wherever they live, work, and travel. Each new generation of mobile technology delivers improved speed, reliability, and functionality. The introduction of 5G further expands the range and quality of services available. In recognition of the social, economic, and sustainability benefits of modern digital infrastructure, the Government is committed to ensuring that both urban and rural communities have access to up-to-date mobile technology.

Rapid technological advancement, coupled with rising subscriber demand, requires continual reinvestment by licensed operators. In line with their licence obligations, operators must routinely upgrade, enhance, and modernise their infrastructure to maintain UpToDate network services. Without the replacement infrastructure proposed, customers in the area will continue to experience insufficient network capacity and poor service.

One will note that if demand exceeds the capability of network infrastructure, it will result in dropped calls, weak connections, and buffering, which impacts not just residents, businesses and visitors, but also the Emergency Service providers that operate in this locale. We would also stress that improved network capacity is critical to ensure that the services provided by the operators run smoothly, reliably and at high speeds, especially when users are streaming, using AI tools and other data hungry apps.

Who will be benefit from improved coverage and capacity?

In considering the merits of this proposal for essential infrastructure, it is important to give due cognisance to those that will be impacted if the current network requirement is not addressed.

According to recent figures published by MobileUK³ it was estimated that there were 87 million active mobile subscriptions in the UK and according to recent figures produced by www.which.co.uk⁴ in an article titled 'Best and Worst UK mobile networks', the customer base of the operators involved in the proposal are as follows:

- EE currently have approximately 25 million customers (approx. 29% of the market)

Based on these figures, one can assume that a similar percentage of mobile network users in the local area would benefit from the proposal. It should, however, be noted that these figures do not include customers who use each of the operators' Mobile Virtual Network Operators (MVNOs)⁵. Most MVNOs do not publicly release subscriber counts but those that will benefit from the proposal include the following:

- EE's MVNOs are 1p Mobile, BT Mobile, Lycamobile, Utility Warehouse.

How people in the UK are using mobile communications networks

The 'Online Nation Report 2025'⁶ produced by Ofcom and published in December 2025, confirms the following:

- UK adults spend an average of 4 hours 30 minutes a day online
- Smartphones accounted for the majority of online time for both genders (men: 75%; women: 79%).

Not everyone, especially those in more rural or lower income areas, has access to fixed broadband, so many rely on smart devices to get online. Because mobile connectivity is now essential to daily life, inadequate mobile infrastructure can prevent users from accessing vital digital services. If these gaps persist, the Government's wider digital goals will not be achieved.

³ <https://www.mobileuk.org/mobile-facts>

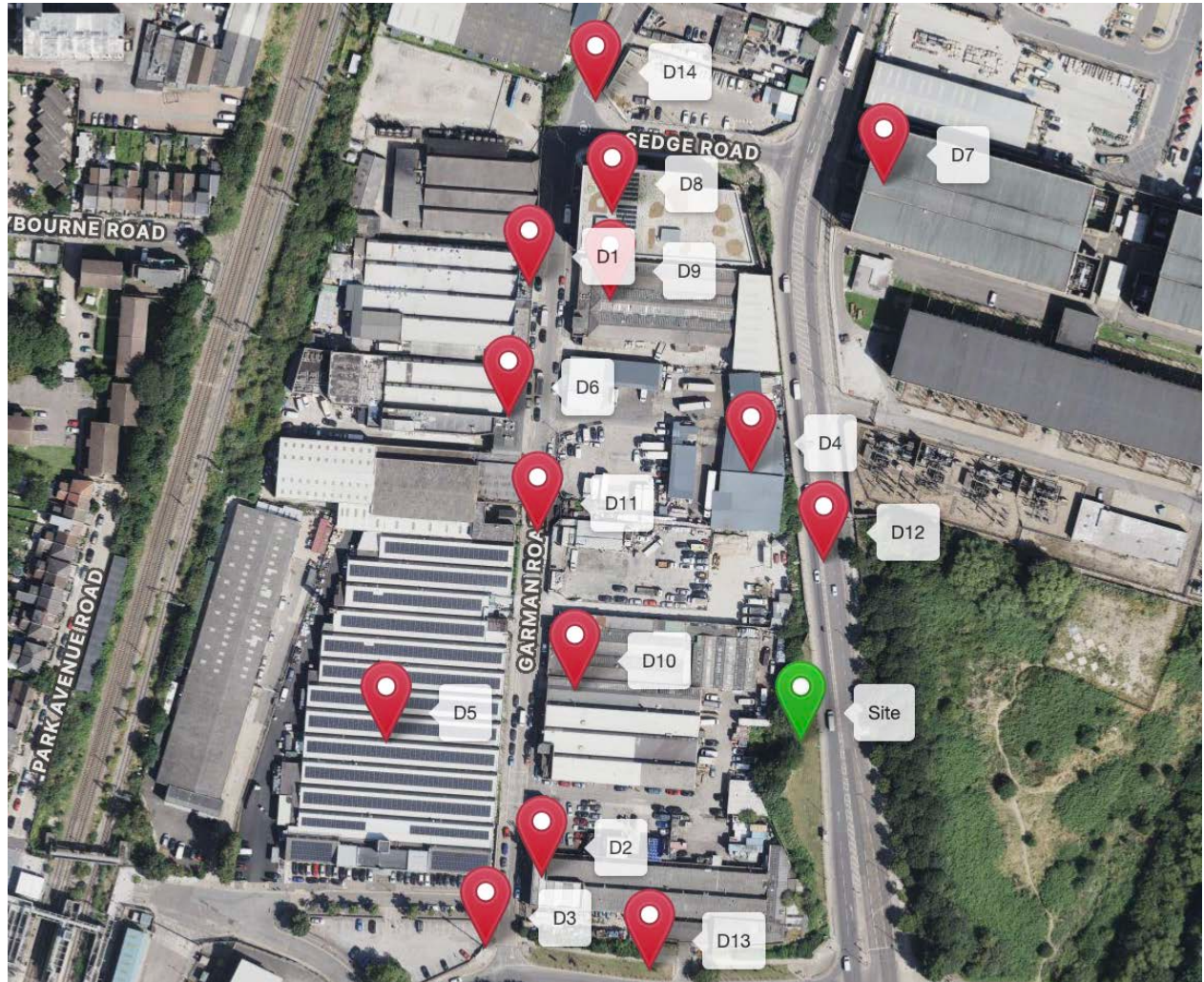
⁴ <https://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-provider-reviews/best-mobile-networks-overview-amhDx1F0z41t>

⁵ MVNOs are providers that offer mobile services without their own signal or infrastructure, i.e., they piggyback on one of the four major networks, i.e., those listed above and EE

⁶ <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/online-nation/2025/online-nations-report-2025.pdf?v=409837>

5. Site Selection Process

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



Discounted Site Options Map

<https://gridreferencefinder.com/#gr=TQ3514591112|Site|2,TQ3504391272|D1|1,TQ3505491061|D2|1,TQ3503491036|D3|1,TQ3512491208|D4|1,TQ3499791108|D5|1,TQ3503791225|D6|1,TQ3516991312|D7|1,TQ3507291299|D8|1,TQ3507291268|D9|1,TQ3506391129|D10|1,TQ3504891185|D11|1,TQ3515191176|D12|1,TQ3506591339|D14|1,TQ3509391029|D13|1>

When looking to address any new network service requirement, operators will generally define a 'search area' to ensure the new infrastructure can best fulfil the operational brief and fit into the existing and planned network for the wider area. It is also important to note that the above boundaries do not take account of topography nor existing built or natural features, so one must appreciate that not every available site within this area will be viable from an operational perspective.

In this instance a search area has not been defined due to the need to identify a viable option close to the site that will be replaced.

Site	Name/Address	NGR	Reason for discounting
D1	The NTQ Site Cell Ref: 14318 Existing base station site at 42 Garman Road, London Borough of Haringey, Greater London, N17 0UL	E535043, N191272	This is the NTQ site where the operator is currently located. However, it is no longer available due to the NTQ being served on the operator due to plans to redevelop the site.
D2	Cornerstone base station site (Cell Ref: 245264) 1-7 Garman Road	E535050, N191070	This base station is hosted by Vodafone (Cell Ref: 16008) and shared by VMO2 (Cell Ref: 37091). The infrastructure sits below 15m and there is no available space for accommodating a further operator. Furthermore, the host building is unlikely to be structurally capable of accommodating additional apparatus. Even if the above matters could be overcome, one will note that EE require an antenna height of 20m for their operational brief to be effectively addressed. This would require the use of a stub mast in the region of 10m and this is simply not viable at this location for reasons explained above under the subheading Siting and Design Considerations' and in Appendix A. This option must be discounted on design and operational merit.
D3	'3' base station Cell Ref: HGY13191 Pavement at junction of Garman Road and Marigold Road	E535034, N191036	The operator has been granted consent for a similar street furniture base station development incorporating a 20m mast, cabinets and all ancillary development at this location under planning ref: HGY/2020/1867. This style of mast cannot be shared by the incoming operator and provide multigenerational services for the two operators without significant redevelopment to a larger monopole of lattice style structure, neither of which would be viable for this roadside location due to their development footprint. This option must therefore be discounted.
D4	Shurguard Self Storage, 45-47 Garman Road, Tottenham, London Borough of Haringey, N17 0QH	E535125, N191210	As the largest unit present in the locale this option was investigated for a rooftop development. Due to the architecture on this large commercial unit and its lightweight roof, there is no viable design option that can be deployed and so this site must be discounted on design grounds. Although a ground-based mast was considered, available space is limited by customer and service vehicle access and parking requirements. A new ground-based mast would reduce the usable space/car parking provision, which in turn could have a negative impact upon the business onsite. Furthermore, it would have no greater planning merit than the proposed development. This option must therefore be discounted.
D5	2-30 Garman Road, Haringey, N17 0QH	E535000 N191110	Due to the limited height and structural capacity of the flat roofed buildings at the northern end, and due to the pitched roof architecture and the presence of rooftop solar arrays on the

			remaining rooftop, there is no viable design option that can be deployed. One will note that EE require an antenna height of 20m for their operational brief to be effectively addressed. This would require the use of a stub mast in the region of 10m, and this is simply not viable at this location for reasons explained above under the subheading 'Siting and Design Considerations' and in Appendix A. In addition, the presence of the solar arrays means that there is no available space on the majority of the rooftop. This site must be discounted on design and operational grounds.
D6	32-36 Garman Road, Haringey, N17 0QH	E535040, N191225	Due to the limited height and structural capacity of the flat roofed buildings at the eastern side, and due to the pitched roof architecture of the remaining rooftop, there is no viable design option that can be deployed. One will note that EE require an antenna height of 20m for their operational brief to be effectively addressed. This would require the use of a stub mast in the region of 10m, and this is simply not viable at this location for reasons explained above under the subheading 'Siting and Design Considerations' and in Appendix A. This site must be discounted on design and operational grounds.
D7	National Grid building, Watermead Way	E535170, N191310	Due to the restricted access to this property as a result of the onsite functions, development upon the rooftop of this building or within its grounds is not viable.
D8	45-49 Garman Road, Haringey, N17 0QH	E535070, N191300	Due to the limited height and structural capacity of the flat roofed buildings at the western side, and due to the pitched roof architecture of the remaining rooftop, there is no viable design option that can be deployed. One will note that EE require an antenna height of 20m for their operational brief to be effectively addressed. This would require the use of a stub mast in the region of 10m, and this is simply not viable at this location for reasons explained above under the subheading 'Siting and Design Considerations' and in Appendix A. This site must be discounted on design and operational grounds.
D9	39-43 Garman Road, Haringey, N17 0QH	E535070, N191270	Due to the limited height and structural capacity of the flat roofed buildings at the western side, and due to the pitched roof architecture of the remaining rooftop, there is no viable design option that can be deployed. One will note that EE require an antenna height of 20m for their operational brief to be effectively addressed. This would require the use of a stub mast in the region of 10m, and this is simply not viable at this location for reasons explained above under the subheading 'Siting and Design Considerations' and in Appendix A. This site must be discounted on design and operational grounds.

D10	9-19 Garman Road, Haringey, N17 0QH	E535060, N19130	Due to the limited height and structural capacity of the flat roofed buildings at the western side, and due to the pitched roof architecture of the remaining rooftop, there is no viable design option that can be deployed. One will note that EE require an antenna height of 20m for their operational brief to be effectively addressed. This would require the use of a stub mast in the region of 10m, and this is simply not viable at this location for reasons explained above under the subheading 'Siting and Design Considerations' and in Appendix A. This site must be discounted on design and operational grounds.
D11	Other street furniture development options along Garman Road	Various	Due to limited footpath width, the presence of underground services (evidence of which is clear from the surface scarring and manhole/inspection chamber covers), the need to avoid impeding points of access, and the use of the footways for parking, there are no viable street furniture development options along this stretch of road.
D12	Other street furniture development options along Watermead Way	Various	Although there may be other viable development options along this stretch of road, the proposed site has been deemed to strike the best available balance between planning and operational considerations given the visual context in which it is set, accessibility and lack of conflict with underground services or highways safety requirements.
D13	Other street furniture development options along Marigold Road	Various	Although there may be other viable development options along this stretch of road, the network planner has confirmed a preference to be located further north to better address the operational brief.
D14	Other street furniture development options along Sedge Road	Various	Development at the pavement north east of the junction of Sedge Road/Garman Road would be viable from a siting and planning perspective. However, the network planner has confirmed that proximity to the large Shurguard building would impede signal and would pose ICNIRP certification issues, so this must be discounted.

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

N/A

Land use planning designations:

N/A

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

Government Ambition and Legislative Reforms

It is important to consider this proposal in a wider context of National and Local Government ambition which clearly recognises the benefits that modern communications networks bring.

- **UK Government Resilience Action Plan, published July 2025⁷**

⁷ <https://www.gov.uk/government/publications/uk-government-resilience-action-plan>

This publication includes reference to telecommunications as part of the Government's 'Critical Network Infrastructure' (CNI) stating that:

"The resilience of the UK's CNI is of central importance to ensuring that the essential services the public rely on continue to operate. Given the fundamental and connected nature of these services, failure has the potential to cause cascading and catastrophic consequences. This could be, for example, power outages impacting other essential functions, like transport or water provision, or a failure in the telecoms or data infrastructure sectors impacting the energy sector - across all four nations."

Paragraph 57

It also confirms that:

"...Telecoms is part of our CNI and underpins many, if not all, economic sectors..."

- **UK Infrastructure: A 10 Year Strategy⁸**

Published in June 2025, and Presented to Parliament by the Chief Secretary to the Treasury by Command of His Majesty, the Strategy highlights the benefits of effective digital technologies in 'Chapter 3: Unlocking growth across regions' under the subheading 'Digital infrastructure for growth and innovation':

"Digital infrastructure supports productivity growth through lowering costs for firms, underpinning technological change, widening access to labour markets across the country and enabling new and innovative services to be provided."

Digital infrastructure also increasingly underpins the provision of services critical for the functioning of society, business, and government – including the operation of other infrastructure sectors. In particular, demand for data centre services is projected to surge over the next decade including for AI development and deployment. The government is committed to facilitating the development and expansion of cutting-edge, secure, and sustainable digital infrastructure that meets the needs of both the private and public sectors."

- **Labour Manifesto⁹**

The Manifesto included a section entitled 'Kickstart economic growth' within which the subsection 'Economic Infrastructure' referenced their views on modern communications as follows:

"In an ever more connected world, Britain's communication network is also vital. Under the Conservatives, investment in 5G is falling behind other countries and the rollout of gigabit broadband has been slow. Labour will make a renewed push to fulfil the ambition of full gigabit and national 5G coverage by 2030."

- **UK Wireless Infrastructure Strategy¹⁰**

The Strategy recognises the benefits that effective connectivity has brought to British households and business by boosting growth, productivity, and opportunity for all. Advanced wireless connectivity is heralded as the foundation on which to build industry, employment, skills and services for the future with 5G identified as being key to driving industry growth and improving public services and transport. Improving digital connectivity is also one of the government's Levelling Up Missions and aims for all places and communities across the UK to share in the benefits of good connectivity, enriching lives and driving local growth.

The document references the Prime Minister's 5 priorities for this government, i.e., to build 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, which this strategy is focused on delivering.

Chapter 5 of the Strategy deals specifically with 'Realising the benefits of 5G and advanced wireless connectivity' and states:

⁸ <https://www.gov.uk/government/publications/uk-infrastructure-a-10-year-strategy>

⁹ <https://labour.org.uk/updates/stories/labour-manifesto-2024-sign-up/>

¹⁰ <https://www.gov.uk/government/publications/uk-wireless-infrastructure-strategy/uk-wireless-infrastructure-strategy>

“5G and other forms of advanced wireless connectivity pave the way for new services and applications that can have a transformative effect on our public services, businesses and our local economies, delivering this government’s priority of growing the economy and creating better paid jobs. Wireless connectivity can support mobile healthcare workers and connected vehicles, improve traffic flow through our cities and enable our factories to be more productive, supporting the fourth industrial revolution. Our evidence is clear that the most significant economic benefits from 5G will come from widespread adoption of advanced 5G by industrial sectors, including manufacturing and logistics, and by public services.

The government is determined that the UK should take full advantage of these opportunities...

We are therefore providing the framework to ensure that people, businesses and public services across the UK are able realise the full benefits of 5G and advanced wireless connectivity as soon as possible.”

With regards to facilitating better connectivity at a local and regional level, Chapter 5 references the need for ‘Local Leadership and Coordination’ stating:

“Local leadership can help to identify and break down barriers to deployment at a local level by bringing together stakeholders across the public sector and building strong relationships with industry. The installation of telecoms infrastructure involves a number of different local government departments (such as planning, estates, highways) and their activities can be siloed and uncoordinated.

It is essential that, at a leadership level, local and regional authorities recognise the importance of wireless connectivity and identify decision-makers within the organisation who are empowered to facilitate private sector investment. By articulating the benefits of wireless infrastructure and connectivity and linking these to digital inclusion (and, in turn, tying these into local authorities’ wider regeneration and growth or ‘place’ strategies) it can be viewed as an inward investment opportunity for places across the UK.”

- **Ofcom Connected Nations Report 2025¹¹**

The annual Connected Nations report measures progress on the availability of broadband and mobile services across the UK, including the newest full fibre, fixed wireless access and 5G networks now being rolled out.

The Report’s section entitled ‘Overview’ confirms the following in relation to 5G coverage and data use:

- Mobile coverage continues to increase, with UK 5G coverage outside of premises from at least one operator now ranging between 94% and 97%...
- Mobile data use continues to rise, increasing by 18% over the past year...
- 5G traffic saw the largest growth...
- 4G remains the dominant mobile technology...

The Report’s section entitled ‘Mobile, data and voice’ confirms that mobile connectivity plays a vital role in how people across the UK access services, communicate and stay connected and states the following under the subheading ‘Highlights’:

- **“5G Standalone (5G SA) is now available across 83% of areas outside of premises in the UK, based on our High Confidence levels. This newer form of 5G is being rolled out alongside existing 5G non-standalone (5G NSA) services.**
- **Overall 5G coverage, which includes both 5G SA and 5G NSA, continues to expand. 5G coverage outside of premises from at least one MNO now ranges between 94% and 97%, based on our Very High and High Confidence levels. Individual MNOs report 5G coverage outside of premises of between 64% and 89%, at our High Confidence level.**
- **4G coverage from at least one MNO now reaches 96% of the UK geographic landmass and extends beyond 99% of UK premises. 4G continues to carry the largest share of mobile data traffic, accounting**

¹¹ <https://www.ofcom.org.uk/phones-and-broadband/coverage-and-speeds/connected-nations-20252>

for 72% of the total monthly mobile data traffic. While it remains the most used mobile technology, its share is gradually declining, down by 6 percentage points from 2024, indicating a shift towards 5G.

- **Monthly mobile data traffic increased by 18% over the past year to 1,257 petabytes (PB),** a growth rate broadly consistent with the previous year.
- **5G traffic saw the largest growth, rising from 227 PB to 348 PB, an increase of 53%.** Notably, 5G SA now accounts for approximately 31% of total 5G traffic, representing around 9% of overall mobile data traffic. This reflects a widespread transition by MNOs from NSA to SA networks.
- **The transition away from older mobile technologies continues.** We expect all MNOs will have completed their 3G switch-off by the end of the year. All MNOs have committed to retiring their 2G networks by 2033 at the latest.
- **The number of direct customers relying on 2G or 3G-only devices is approximately 2 million,** broadly similar to the 2.1 million reported in 2024.”

• UK Digital Strategy Policy Paper¹²

The UK Government’s Policy Paper was updated on 04 October 2022, within which ‘Section 1 Digital Foundations’ reiterates that digital infrastructure plays a vital role in the daily lives of modern society and is the foundation of a thriving digital economy. The Strategy confirms that every part of the UK needs world-class, secure digital infrastructure that enables people to access the connectivity and services they need, where they live, work or travel, and clearly states the ambition to supply the majority of the UK’s population with access to 5G by 2027. The Strategy also highlights the fact that enhancing digital connectivity is ‘Mission 4’ of the Government’s Levelling Up White Paper¹³.

• The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2022¹⁴

The reader will be aware that amended planning legislation was introduced on 04 April 2022 in the form of the above, which saw a relaxing of planning laws to facilitate Government ambition for all to have access to effective and UpToDate mobile communications services in recognition for the benefits that modern communications networks bring.

The ‘Explanatory Memorandum’ that accompanied this amendment confirms that:

“Permitted development rights have an important role to play in the planning system. They provide a more streamlined planning process with greater planning certainty, while at the same time allowing the local consideration of key planning matters through a light-touch prior approval process.

Policy Background, What is being done and why? Paragraph 7.1

It is essential that the planning system continues to effectively support the deployment of new mobile network infrastructure. The changes will provide Code Operators with flexibility to upgrade existing sites in England for 5G delivery, enhance coverage and meet growing demands for network capacity. They will also reduce the time, cost and uncertainty involved in upgrading mobile network infrastructure and encourage the use of existing infrastructure and promote site sharing to reduce the impacts of new deployment.

Policy Background, What is being done and why? Paragraph 7.3

Article 3(2)(a) of this Order alters the height limits for the deployment of new groundbased masts through permitted development rights. These changes permit the installation of new ground-based masts of up to 30 metres in height on unprotected land, and up to 25 metres on Article 2(3) land.¹⁵ In both cases Code Operators would need prior approval from the local planning authority. These changes

¹² <https://www.gov.uk/government/publications/uks-digital-strategy/uk-digital-strategy>

¹³ <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>

¹⁴ <https://www.legislation.gov.uk/uksi/2022/278/contents/made>

¹⁵ Please note that A1(1)(c) of the GPDO also limits the height of new ground based masts on highways land to 25m

will reduce the number of new ground-based masts needed and will particularly support deployment of the Shared Rural Network, a programme to increase mobile network coverage throughout the UK.

New ground-based masts, Paragraph 7.16

- **Future Telecoms Infrastructure Review (FITR)¹⁶**

In 2018, the Department for Digital, Culture, Media and Sport published the FITR, outlining the Government's intent on being the best place to start and grow digital business with the aim of providing the majority of the population with 5G coverage by 2027. The FITR made it clear that 5G networks will deliver faster and better mobile broadband data services to consumers and businesses and will enable innovative new services for industry sectors, including manufacturing, transport, immersive technologies and healthcare.

- **The Electronic Communications Code 2017¹⁷**

Government ambition and recognition for the benefits that modern communications networks bring is also clearly evident in the publication of this document which has made it easier for network operators to install and maintain apparatus, such as phone masts, exchanges and cabinets, on public and private land with Part 4, Paragraph 20, providing a mechanism for the courts to impose terms of occupation on a landowner and the Operator or infrastructure provider. Further amendments to this Code are imminent, to help streamline the acquisition process and clarify relationships between infrastructure providers and site owners.

Regional Ambition

- **London Growth Plan 2025¹⁸**

This plan has been developed jointly by the City Hall and London Councils and is London's 10-year ambition for growth and the actions needed to make it happen.

The plan highlights that the plan should make numerous positive changes including, that Londoners should benefit from better digital connectivity at home, for work and on the move. This can be done by encouraging investment in fibre and mobile infrastructure.

Kingston is identified as one of the regionally significant office clusters outside the city centre, highlighting the importance of improving digital connectivity in the Borough.

This growth plan does not describe digital or technology as a sector because it is now mainstream across the global city sectors. Internet, mobile, cloud and increasingly AI are everyday technologies in London. They are transforming legacy businesses and enabling new ones.

Improving internet access across the city will support productivity, better public services and safer local places. For example, SMEs are missing out on an estimated £28bn in annual revenue due to slow and unreliable workplace broadband. Installing full fibre broadband allows the city to expand CCTV coverage and install sensors to monitor traffic congestion and air quality. London will continue to expand full fibre, improve capacity in mobile networks to boost 5G coverage and make Wi-Fi access easier, by working in partnership with industry.

London has some world-class infrastructure, but some of it is creaking and not ready for growth – particularly the power grid. We need transport, logistics, low-carbon energy, clean water, waste and digital connectivity infrastructure that is designed for the future and climate resilient.

Other

- **Times Article, Prime Minister Comments**

¹⁶ <https://www.gov.uk/government/publications/future-telecoms-infrastructure-review>

¹⁷ <https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/policy/electronic-comm-code>

¹⁸ <https://growthplan.london/>

On 05 December 2024, the Prime Minister, Sir Keir Starmer, was quoted in an article in The Times, confirming that housing needs to be supported by good infrastructure, stating:

“Every road, pylon and mast – which connect people with opportunity – must jump through endless hoops, only to be opposed, dragged out, before eventually, if lucky, approved...”

- **Department for Science, Innovation & Technology’s Minister of State letter to Council Leaders**

On 29 November 2024, the Minister of State, Chris Bryant MP, wrote a letter to Council Leaders, urging support for digital infrastructure deployment and collaboration with mobile network operators, stating:

“The Government is committed to supporting the delivery of next-generation connectivity to communities across the UK by driving towards nationwide gigabit broadband and 5G coverage by 2030.

We need your help to achieve these goals. Broadband and mobile rollout rely heavily on local authorities prioritising digital infrastructure and placing it at the heart of their wider Place strategy. I am writing to you today to highlight a number of areas that remain a challenge, and how they can be approached to boost telecoms investment in your area.”

Summary

Each of the above demonstrates the governmental recognition of the increasing importance of reliable connectivity now and in the future and they set the scene in which Decision Makers must determine telecommunications applications, particularly in areas where coverage and capacity issues are being experienced, as is the case in this instance.

It is also clear from the above that the preceding and current UK Governments have both placed an onus on Planning system reform to drive the economy with the 2022 revision to the GPDO having relaxed planning laws and increased permitted development rights in favour of the roll out of digital infrastructure, helping to facilitate access to effective communications networks for all. The 2024 revision to the NPPF then also explicitly references Digital Infrastructure in the chapter related to ‘Building a Strong, Competitive, Economy’ and one will also note that the publication of the 10 Year Strategy commits to a ‘Call for Evidence’ on legislation related to streamlining the delivery of digital infrastructure, given the socio-economic benefits attached. The 2025 Resilience Action Plan then also adds further weight to the argument by reiterating that telecommunications are ‘Critical National Infrastructure’ that is integral to many, if not all, economic sectors. These governmental aspirations are undeniable.

Planning Policy and Other Material Planning Considerations

When considering the appropriateness of the proposal, it is imperative that decision maker give material weight to telecommunications specific policy where it exists. If it does not exist at a local level, or if the policy is out of date, then the NPPF must prevail. One must also appreciate that it is extremely unreasonable to expect niche infrastructural development, such as that proposed development, to strictly adhere to more general policy criteria. Furthermore, it is a material consideration to recognise the planning application type as the proposal benefits from permitted development subject to a prior approval determination.

Prior Approval

The Prior Approval system has been long since used to facilitate telecommunications development, in which in more recent times the UK Government have introduced the Prior Approval process as part of its broader planning reforms to streamline working practices, reduce bureaucracy, and encourage growth, especially in housing and renewable sectors. Therefore, it must be remembered in this case that the principle of development has already been established by National Government when the current permitted development rights contained within Part 16 of the Order which were last updated and came into force in April 2022. This statutory legislation necessitates that when a telecoms proposal falls with the limits of PDRs, it results in the requirement for a prior approval application and an assessment by the determining body relating to matters of siting and appearance only.

A prior approval is not like a planning application and The Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government have published updated guidance on the matter in July 2023, entitled 'When is permission required?'¹⁹

Under the sub-heading 'Is a prior approval application like a planning application?', the guidance states:

"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. Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion as to 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."

Paragraph: 028 Reference ID: 13-028-20140306

We would reiterate that permitted development rights allow the MNOs to deploy communication apparatus, such as the development proposed, within certain size restrictions and subject to the prior approval of the Council, i.e. there is a 30m high mast threshold for development, (25m on Article 2(3) land or highway land), under the changes to the prior approval process, in which clearly this proposal falls well below the relevant threshold.

National Planning Policy Framework (NPPF) December 2024²⁰

The NPPF recognises the role that modern communications systems must play in achieving sustainable economic growth and provides a set of national planning objectives which are designed to support growth, protect the environment and ensure decisions are made at a local level. It encourages a more positive approach to how LPAs view development proposals with an emphasis on the important benefits modern communications bring, for example helping to achieve sustainable economic growth and the need for access to high quality mobile services in all areas, both urban and rural.

Section 10 of the NPPF is entitled "Supporting High Quality Communications" and reiterates in paragraph 119 that:

- Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being
- Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)

Paragraph 120 advocates that:

- Site/mast sharing be encouraged; and
- New sites should be carefully designed using camouflage techniques where necessary and possible

Paragraph 121 then goes on to highlight that LPAs:

- Should not impose unnecessary restrictions on telecommunications development
- Should reassure themselves that no impact upon other electrical equipment or instrumentation will occur
- Should consider the possibility of the construction of new buildings or other structures interfering with broadcast or other electronic communications

Paragraph 122 requires that applications be supported by appropriate justification including consultation with educational establishments or safeguarding bodies and via the provision of an ICNIRP certificate.

Paragraph 123 also places an emphasis on the fact that LPAs must determine applications for communications infrastructure on planning grounds alone.

¹⁹ <https://www.gov.uk/guidance/when-is-permission-required>

²⁰ https://assets.publishing.service.gov.uk/media/669a25e9a3c2a28abb50d2b4/NPPF_December_2023.pdf

Other relevant Sections from the NPPF are outlined below:

- Section 2's 'Achieving Sustainable Development', promotes sustainable development via the support for economic, social and environmental objectives
- Section 4's 'Decision Making', confirms the need for LPAs to approach decisions on proposed developments in a positive and proactive way, seeking to approve applications for sustainable development where possible.
- Section 6's 'Building a strong, competitive economy', outlines the need to support economic growth with specific reference to digital infrastructure, highlighting the need to appreciate specific locational requirements; a matter that is which is very relevant to communications development which is based upon very specific geographical necessities. With modern technologies, coverage requirements must be addressed from within or extremely close to the target area.

Code of Practice for Wireless Network Development in England²¹

This document, known as 'the Code', provides guidance to Code Operators (referred to as 'operators' throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when acquiring the land for and 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 current Code of Practice builds upon the aims of that which it replaced, i.e., the Code of Best Practice 2016, 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.

Although led by the Department for Digital, Culture, Media and Sport (DCMS), this Code of Practice has been developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes.

The document outlines the Legal and Policy frameworks within which the document has been produced and reiterates the following:

"Digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK.

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

Paragraphs 8 and 9

It is also important to note the Code states that:

"Section 10 of the NPPF sets out the planning policies for communications development in England, and states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. The NPPF also sets out that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G). Other sections of the NPPF set out how these policies should be balanced with other considerations, including conserving and enhancing the natural environment and historic environment."

Paragraph 15

With regards to how wireless networks function, and with specific reference to 5G, the Code states that:

²¹ <https://www.gov.uk/government/publications/code-of-practice-for-wireless-network-development-in-england>

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

Paragraph 17

The Code also outlines its ‘Principles and Commitment’ as follows:

“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 18

Equally importantly, the current Code outlines the role of the Local Planning Authority stating:

“Local planning authorities should support the deployment of digital infrastructure by:

- *Incentivising connectivity: support the expansion of telecommunications networks, and take a ‘joined-up’ approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.*
- *Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.*

- *Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.*

Information and communication: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives)."

Paragraph 19

On the issue of site selection, the Code states the following:

"Planning authorities should consider... the need for a site within a limited search area alongside the public benefit of improved connectivity. In general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations."

Paragraph 27

On the matter of 'Design' paragraphs 28 and 29 outline the following design principles:

"The siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact. The following design principles are important considerations:

- *Protecting visual amenity: a comprehensive assessment of the area should be carried out to ensure that the design solution appreciates the context of its location by fitting with both the site and the wider setting. Proposals should take into account protected sightlines, landmarks and vistas. This is particularly important when mobile infrastructure is located in protected landscapes or heritage sites and their settings (see 'Natural Environment and Heritage Assets' section below).*
- *Mitigating visual impacts: when possible, operators should look to use sympathetic designs, materials and colour (including camouflage where appropriate) to minimise the contrast between infrastructure and the area. Operators should also consider the design principles set out in the NPPF and local planning policies, and consider any relevant local and national design codes.*

There are factors that can affect the type of infrastructure that will be deployed including location and the coverage and capacity requirements. 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..."*

Paragraphs 28 and 29

On the matter of heritage, the Code states:

"The siting and location of any wireless infrastructure can be critical to visual impact. Operators should therefore consider how harm to heritage assets from both the process of installation of equipment, and subsequent visual impacts, can be avoided or minimised."

Paragraph 59

The Code's subsection entitled 'Technical and operational considerations confirms that there are 3No. 'primary technical and operational considerations for sites, i.e.:

- They must supply appropriate coverage to the intended area
- They must offer sufficient capacity to meet demand; and
- They must be able to connect into the wider network

And with regards to '5G network development considerations' the Code reiterates that:

"...5G installations will be more constrained and guided by these special technical and operational considerations."

Paragraph 66

With regards to sites that receive a 'Notice to Quit', the Code's subsection entitled 'Technical and Operational considerations', includes the following under the heading 'Site accessibility and availability':

"...In addition, the Notice to Quit (NTQ) provisions within code agreements mean that sites have to be relocated. Where NTQs are proposed, the existing coverage and capacity will be removed and as such a replacement site is needed within close proximity to where the existing site was located."

Paragraph 71

Regional Planning Policy and Guidance

- **The London Plan 2021²²**

The Mayor of London's adopted London Plan 2021 ('The Plan') forms the Spatial Development Strategy for Greater London setting out a framework for how London will develop over the next 20-25 years. Along with the mayor's vision for Good Growth, the policies in the Plan should inform decisions on planning applications across the capital. The Plan confirms that each of the London Borough's Local Plans must be in 'general conformity' with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably, which the London Plan sets out. The foreword of the Plan confirms the intent to make London a pioneering smart city with world-class digital connectivity supporting more digital devices to improve the lives of Londoners and enable businesses to thrive and ensure London's global competitiveness. This theme runs throughout the Plan.

The Plan contains 'Policy SI 6 Digital connectivity infrastructure' which, as the name suggests, is specific to development such as that being proposed. The policy states:

- A. *"To ensure London's global competitiveness now and in the future, development proposals should:*
- 1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users*
 - 2) meet expected demand for mobile connectivity generated by the development*
 - 3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation*
 - 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.*
- B. *Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access."*

The above Policy is followed by further justification in the form of Paragraph 9.6.1 which states:

"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."

²² <https://www.london.gov.uk/programmes-strategies/planning/london-plan/london-plan-2021>

Given the fact that modern and efficient digital communications are integral to the well-being of the city's economy, help reduce the need to travel, provide social inclusion benefits and are the main means of contacting the emergency services, it would also be wrong to ignore the following general policies in a weighted manner:

- GG1 Building strong & inclusive communities
- GG3 Creating a healthy city
- GG5 Growing a Good Economy
- GG6 Increasing efficiency and resilience
- D2 Infrastructure requirement for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering Good Design
- D8 Public Realm
- E8 Sector growth opportunities and clusters
- HC1 Heritage conservation and growth
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- T2 Healthy Streets
- T7 Deliveries, Servicing and Construction

Chapter 1 of the London Plan deals with 'Planning London's Future – Good Growth' with paragraph 1.0.1 relating 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".

Paragraph 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...

'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 proposed development will provide a solution for improved network coverage and capacity, whilst also offering new 5G services, which is much needed for reliable up to date connectivity and will ensure good quality essential infrastructure to support strong inclusive communities and contribute to economic opportunities and an inclusive London.

Paragraph. 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’.

The supporting text for Policy GG5 ‘Growing a good economy’ states:

“...1.5.1 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.”

“...1.5.3 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.”

“1.5.4 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.”

Policy GG5 goes on to confirm:

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

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

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

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

The Plan’s Chapter 6 ‘Economy’ includes ‘Policy E8 Sector growth opportunities and clusters’, the relevant sections of which state:

“A. Employment opportunities for Londoners across a diverse range of sectors should be promoted and supported along with support for the development of business growth and sector-specific opportunities.

B. London’s global leadership in tech across all sectors should be maximised.

G. In collaboration with the Mayor, boroughs are encouraged to identify and promote the development of Strategic Outer London Development Centres (SOLDC) that have one or more specialist economic functions of greater than sub-regional importance. SOLDCs should be supported by:

2. coordinating infrastructure investment

6. improving Londoner’s access to employment opportunities.”

Further justification is supplied in Paragraph. 6.8.1 which states:

*“The Mayor wants London to continue to provide the best environment in the world in which to do business, so that businesses of all different sizes and sectors can reach their growth potential. This includes **supporting***

business and employment across all sectors of the economy and capitalizing on new growth opportunities in emerging sectors.”

With Paragraph. 6.8.3 continuing that:

“tech and digital sector – which supports the growth and evolution of all sectors in the economy. Planning should ensure that new developments have the digital connectivity required to support London’s global competitiveness (see Policy SI 6 Digital connectivity infrastructure). ...The Mayor will support the growth of the tech and digital sector across all of London”

Local Planning Policy and Guidance²³

The Haringey Local Plan policies, plans and strategic policies, development plan and supplementary planning documents, area action plans, North London Waste Plan, and delivering net zero must all be considered when assessing any planning applications.

- Development Management Development Plan Document (DPD)
Sets out planning policies to help determine which developments are granted planning permission in Haringey. Adopted on 24 July 2017, the document included the following policy that is most relevant to the proposed development:

“DM54 Facilitating Telecommunications Development

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.

Given that telecommunications infrastructure is visible in the public realm and is the main means by which people contact the emergency services, with EE being the Emergency Services Network provider, the following general policy must also be taken into account:

- DM1 Delivering High Quality Design
- DM2 Accessible and Safe Environments
- DM3 Public realm
- Haringey’s Local Plan: Strategic Policies
Adopted by the council in 2013 to replace the Unitary Development Plan (UDP), with subsequent alterations adopted on 24 July 2017. The document sets out the long-term vision of how Haringey should develop by 2026. It sets out a strategy for achieving that vision, including high-level strategic policies used in determining planning applications.

Given that telecommunications infrastructure helps reduce the need to travel, facilitates working from home practices, enables remote access to a multitude of services and is a means of promoting digital inclusivity, the following are considered to be relevant policies:

- SP0 Presumption in favour of sustainable development

²³ <https://haringey.gov.uk/planning-building-control/planning/planning-policy>

- SP4 Working towards a low carbon Haringey
- SP9 Improving skills and training to support access to jobs and community cohesion and inclusion
- SP11 Design

However, one must appreciate that it would be unreasonable to expect such niche infrastructure as that proposed to adhere strictly to general policy criteria. This must therefore be applied in a weighted manner when considering siting and appearance.

Planning Summary

A summary as to why the subject proposal adheres to all relevant policy criteria is outlined below:

- **Legislative context**

We have established that Part 16 of the GPDO ratifies that prior approval applications benefit from permitted development rights and are therefore accepted in principle by virtue of the legislation. In this case the proposed development incorporates a 20m high mast which is 20% under the threshold for highways land or development.

This prior approval relates to only the siting and appearance, nothing else can be taken into account. A prior approval is not like a planning application and The Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government have published updated guidance on the matter in July 2023, entitled 'When is permission required?' The LPA must appreciate that the planning mechanisms and statutory requirements relating to a Prior Approval application must be considered with a lighter touch when compared with a Full Planning Application. They are, after all, much less prescriptive with far fewer legal elements than those associated with a full planning application, i.e.:

- the planning unit does not need defined with a red edged location plan
- the application does not need to conform to both national and local validation requirements in order to be registered; and
- dischargeable conditions cannot be attached.

The Prior Approval procedure is akin to the grant of outline planning permission with the precise siting and detailed appearance of the apparatus reserved. The principle of the development is therefore approved under the provisions of the GPDO, and the determination must be confined to siting and appearance.

- **Operational Requirement**

There is a clear operational need for the development, i.e., the infrastructure is required to replace an NTQ site and to provide upgraded network services in line with technological advancements and to meet current network user demand. Replacement and improved network coverage and capacity is required in the target area; an area that is not currently benefitting from UpToDate coverage and/or satisfactory capacity to the extent that network users cannot make full use of their devices.

The intent is that the proposed infrastructure will supply multigenerational (inc. 5G) services technologies to the benefit of approximately 29% of the population/community, who according to recent figures are EE customers.

Due recognition must also be given the fact that EE are the Emergency Services Network provider. Without replacement and upgraded infrastructure, network users, which include those working in front line emergency services, will continue to experience limited services and poor network capacity, the result of which is dropped calls, buffering and poor connectivity during peak times.

- **Siting**

The siting of any new base station development is directly linked to operational need and proximity to the base station that is being replaced is a key factor. It must be acknowledged that proximity to the NTQ site is key for the replacement development to fit seamlessly into the existing and planned network for the wider area which is being built around existing cells and established sites.

A sequential approach to site selection has preceded the nomination of this site and further details have been supplied above. One will note that there are no other existing telecommunications sites or buildings/other structures available for use that offer viable development opportunities for fulfilling the operational brief or that provide a more acceptable planning solution. Equally there are no new ground-based development options that strike a more appropriate balance between operational and planning considerations. However, should the LPA or any other stakeholder wish to put forward any alternative site suggestions then these will be gratefully received and investigated.

With regards to the alternative site assessment criteria outlined by the NPPF in Paragraphs 120 and 122, we contend that these have been met and exceeded. Afterall, the NPPF places no obligation on the developer to identify the 'ideal' site but rather advocates that they undertake an alternative site assessment that includes consideration for the use of existing masts, buildings and other structures stating:

"...for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met."

Paragraph 122c, NPPF

The Council must appreciate that every possible location does not need to be robustly demonstrated as unviable for use and that applicants do not need to provide absolute proof that no less sensitive location is available for the base station to be sited. To expect so would mean the LPA are clearly misinterpreting what the NPPF requires, i.e., the provision of evidence that existing buildings/masts or other structures have been explored.

- Appearance

As has been touched upon earlier in this statement, the design of any new base station development is directly linked to operational need and has to be tailored to the bespoke nature of the site in question, i.e., with consideration of topography, proximity to other natural and manmade features, planning policy and other local sensitivities. It must also be structurally capable of accommodating the necessary transmission apparatus at the required height.

Following the nomination of the subject site, a well-considered design process has been implemented with the applicant having to balance technical requirements with the minimisation of visual impact. Street furniture masts are the slimmest available within the operator's design portfolio and are readily accepted throughout the UK, including this area of Haringey, as the most appropriate design solution for roadside locations.

As indicated above, 'camouflaged' design options that were available in earlier generations of base station site are no longer viable for modern base stations due to the size of the apparatus and the detrimental impact that shrouding can have upon their operation.

The amount and size of the apparatus proposed is a direct reflection on the multi-generational operation of the site and each element has been limited to an operational number and dimension.

The proposed colour scheme of all the apparatus has been tailored to best reflect the streetscape against which the development is set but the applicant would be happy to consider any alternative preference that the LPA may have.

- Impact upon amenity

Whilst some impact upon general amenity will occur as a result of introducing any new mast structure to any environment, one must appreciate that this is a replacement mast proposal, i.e., the decommissioning of the NTQ site will mean that no additional base station is being introduced to the landscape. Impact upon amenity will be neutral at best and has been limited through sensitive siting and design procedures. Whilst visible to the road network, one must acknowledge that those using the road network do so on a temporary basis and with their perspectives on the development constantly changing as they travel through the area. In addition, the development is set in an appropriate context of roadside planting, large commercial units and other features of note that include pylons and other peripheral base station development.

It must be recognised that telecommunications development is an accepted infrastructural element in our modern landscapes. Decision Makers must therefore acknowledge the fact that mobile telecommunications base stations, like street lighting, signage, bus stops, gas, electricity, water and any other utilities/infrastructural elements, are integral pieces of infrastructure upon which, now more than ever, our society is heavily dependent. It would, therefore, be wholly wrong to suggest that a base station development is an 'alien' feature in any modern environment.

Any limited harm that may occur is considered to be acceptable and well outweighed by benefit and operational justification.

The proposed development is essential infrastructure, replacing an existing base station. The development will allow local residents, businesses and visitors, including Emergency Services operatives, to access the many social and economic benefits associated with modern communications network services. High quality and reliable communications infrastructure are essential for economic growth and social well-being and the demand for mobile data in the UK is increasing rapidly as households and businesses become increasingly reliant on mobile connectivity. The infrastructure must therefore be in place to ensure supply does not become a constraint on future demand. There should be no doubt that the Government fully supports the development high quality communications infrastructure and decision makers must appreciate that the NPPF advocates that local planning authorities should also support the expansion of electronic communications networks where impact is deemed to be acceptable or outweighed by benefit.

In relation to the establishment of replacement infrastructure, there have been a number of decisions whereby the Inspector has heavily weighed operational need against any perceived visual harm. Examples are supplied below.

- PINS ref: 3197522: Andover Road, Winchester
The Inspector suggested that significant weight should be placed on maintaining and enhancing coverage, stating:

"I attach significant weight to the public benefit arising from the continuation of local service provision... Having regard to all relevant considerations, including national planning policy and the potential availability of alternative sites, my findings are that the proposal's public benefit in maintaining and enhancing local telecommunications coverage and capacity would outweigh the limited harm arising to the character and appearance of the area."

- PINS ref: 3287882: High Road, Weald Lane
The Inspector took a similar approach to the above, stating:

"I have also found that there is a clear need for the development in this location in order to sustain and enhance communications infrastructure within the area. The evidence before me indicates that there is a lack of reasonable alternative sites within the area which would provide the required coverage. ...I also recognise the benefits associated with improved communications infrastructure within the area which would not otherwise be achieved... the benefits of the scheme would outweigh the harm which would be caused to the character and appearance of the area."

- Flooding
A flood risk assessment is not considered necessary in this instance.
- Health
An ICNIRP Certificate has been supplied. As such, the issue of health is not a material planning consideration. However, for the benefit of further information on this matter, we would refer the reader to the additional supporting information that has been submitted with this application.

Conclusion

The proposed base station development is nationally important replacement infrastructure being deployed at a local level, in the public interest and in line with National Government and regional aims to support the digital economy, global competitiveness, and the right infrastructure for underpinning world class connectivity.

One must appreciate that the technical requirement is based on the provision of a replacement infrastructure following the forced decommissioning of an existing base station site; this technical need simply cannot be addressed from a peripheral location.

The criteria of both the NPPF and the LPA's planning policy has been adhered to for the many reasons outlined above and it is our contention that in devising the proposed base station; a replacement, multi-generational solution incorporating a minimum amount and size of essential infrastructure located at sensitively chosen location, the applicant has afforded full respect to the amenity of the surrounding area and the features within it and an acceptable level of impact upon the public domain and the amenity of the area.

The proposed base station has specific functional and operational criteria that cannot be expected to adhere strictly to more general policy criteria. Therefore, when considering the merits of the proposed development against more generalised policy criteria, it must be done in an appropriately weighted manner. In addition, the Decision Maker must provide an appropriately balanced and comprehensive assessment of all relevant planning matters. It is imperative to acknowledge that it is almost impossible for telecommunications development to enhance the character or setting of the area in which it is required to be deployed and more often than not all that can be done is to seek to minimise impact to an acceptable level through sensitive siting and design practices, as has been the case.

The need to ensure that everyone can access the many benefits of modern communications services is clear within National Government and regional aims, which support the digital economy, global competitiveness, and the right infrastructure for underpinning world class connectivity.

We trust that the above and enclosed information is to your satisfaction and would be happy to expand upon any aspect of this proposal if required.

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Company:	Perry Williams on behalf of KTL		
Company Address:	Perry Williams 37-38 Market Street Ferryhill Co. Durham DL17 8JH	Email Address:	dperry@perrywilliams.co.uk
Signed:		Date:	20/04/2026
Position:	Consultant Town Planner	(on behalf of BTEE)	

Appendices:

SSSI Appendix A: Design Options

SSSI Appendix B: Public Benefit Information

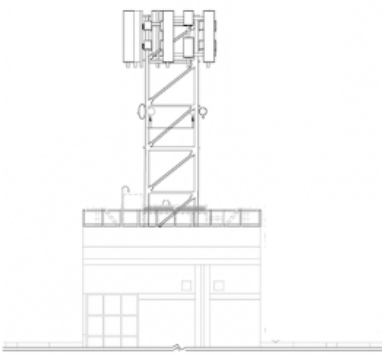


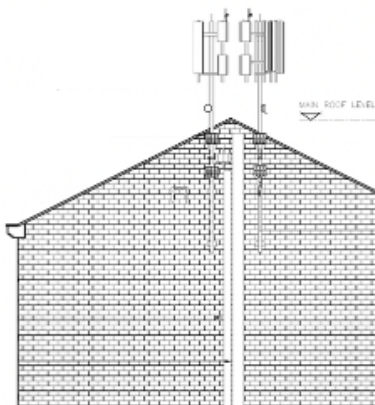
CONNECTING COMMUNITIES

Perry Williams Ltd

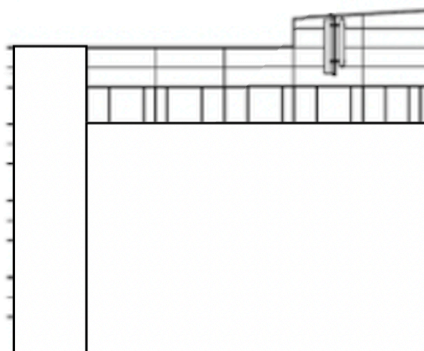
Appendix A

Building-based design options

Rooftop Stub Masts	
	Due to the weight of modern antennas and the associated engineering and steelwork required involved, stub mast solutions tend only to be deployed on large buildings with significant structural capabilities, (e.g., multistorey residential tower blocks, car parks, hotels). These masts tend to be set upon a steel grillage base or concrete plinth which further increases the structural demands upon the host building.

Wall-mounted support poles	
	This design tends to be deployed on the gable ends of commercial or industrial buildings in the region of 15-20m in height and where sufficient wall space is available. On average, the poles and antennas will need to protrude 4-6m above the roofline to provide sufficient height for the antennas to reach the target coverage area and comply with ICNIRP requirements. However, the actual height requirement is dependent on the height of the host building, the technologies to be deployed and the presence of surrounding buildings and the way they are used, e.g. roof top terraces, balconies, windows, etc. It is imperative that no person can unknowingly encroach upon the exclusion zones around the antennas. In addition, if support poles are not proportionate to the size of the host building, they will look out of place. The host building would have to be of adequate height to secure these poles safely. This type of scheme requires sufficient bracing to account for wind loading, with brackets to be bolted at intervals down the side of the building, through the entire wall and fastened internally via a number of back plates to ensure stability. The support pole needs to be a minimum of equidistant in height above and below the building height to ensure sufficient fixtures can be achieved. The poles also have to protrude above the building and surrounding features to avoid signal clipping and ensure no person can access areas of the host building's roof that may encroach upon the exclusion zone around the antennas that are supported. The internal back plate fixtures have legal implications and would be intrusive for the occupants, both during construction and maintenance with the backplates requiring checked at least once a year on routine maintenance visits. Backplates within residential properties is not viable as it would be too intrusive, both during construction and maintenance.

Wall-mounted antennas

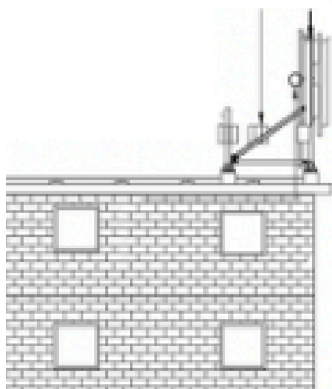


Antennas are fixed to brackets attached to the wall allowing them to sit out approximately 200mm from the building façade and be orientated to best address the operational need, tend only to be used on large buildings in the region of 20-25m in height and in setting where the neighbouring buildings are much lower in height.

Antenna locations need to avoid proximity to windows for ICNIRP reasons with easy access available for a cherry picker for construction and maintenance purposes.

The bracketing upon which the antennas are fixed can either be direct to the wall, or they can incorporate a pole allowing for more acute antenna orientation, as per the design example below.

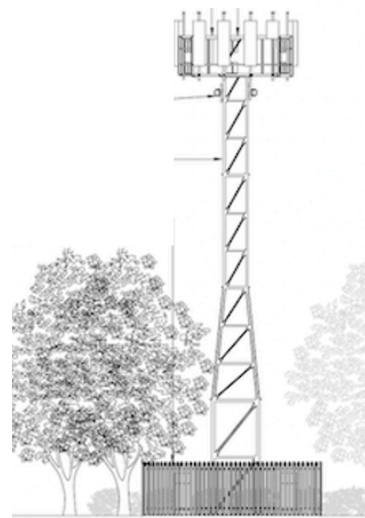
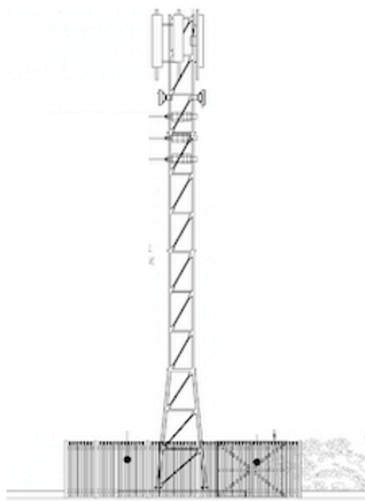
Pole-mounted antennas



Can be deployed on medium scale, flat roofed, residential, commercial or industrial buildings. Using tripod style structures attached to newly deployed steel grillage, or the existing concrete or steelwork of the host building, the antennas will protrude 4-6m above the host building and are usually located on a central plantroom or close to the edge of the building to avoid signal clipping. The antennas also need to be positioned at a height and location that will ensure no person can access areas of the roof that may encroach upon the exclusion zone around the antennas.

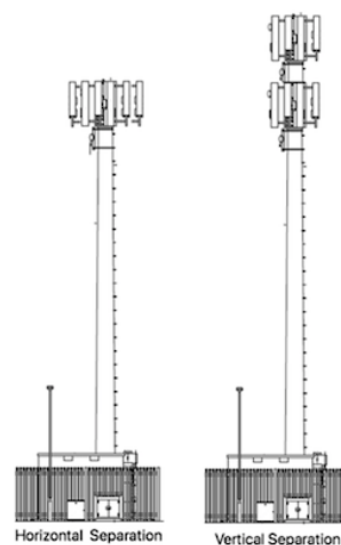
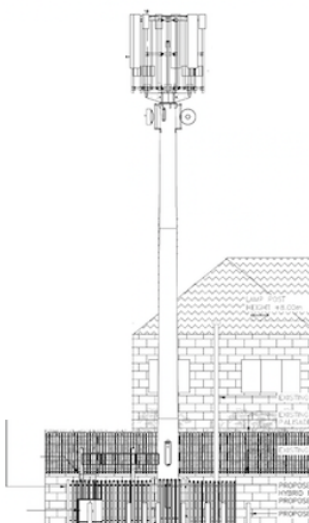
Ground-based design options

Single operator and shared lattice mast design examples



Operators tend to have both single operator and shared, multi-generational lattice style mast options within their ground-based mast design portfolio and examples of these are provided above. These masts are significantly more substantial and structurally robust than street furniture masts, thus they have a wider girth and larger footprint. The use of an open headframe allows operators to separate, orientate and/or tilt antennas to direct their signal to specific target areas, so their operational potential is much greater than a street furniture mast. For a shared solution, a wider headframe (usually 4m wide as standard) facilitates the necessary separation between individual operators' transmission equipment. Lattice mast solutions tend to be deployed in less sensitive urban/suburban areas, for example commercial/industrial estates or recreational grounds, where antenna heights above 25m are required. They also tend to be preferred to monopole solutions in more rural settings given that they offer a degree of transparency that a solid monopole structure does not. Because these masts are climbable structures they need to be secured within a fenced compound, usually requiring a 10m x 10m area.

Single operator and shared monopole mast design examples



Operators tend to have both single operator and shared, multi-generational monopole style mast options within their ground-based mast design portfolio and examples of these are provided above. These masts are significantly more substantial and structurally robust than street furniture masts, thus they have a wider girth and larger footprint. The use of an open headframe allows operators to separate, orientate and/or tilt

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Street furniture masts are the other available option.

This design incorporates a stacked antenna layout whereby sets of antennas would be located one below the other. This is not a climbable structure and can therefore be deployed without the need for security fencing.



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Appendix B

Public Benefit

It is undeniable that mobile communication is now a key part of sustainable development and a vital tool in our personal lives and in both business activities and government operations. Indeed, the demand for faster and improved mobile connectivity continues to grow with modern society now expecting to be able to make use of mobile devices to their full potential where people live, work and travel. Each new generation of mobile communications technology has provided us with higher speed, better connection, and many more advanced features on our mobiles, and now with 5G, we can expect to experience an even more extensive range of telecommunication services. There is, therefore, a drive by the Government to ensure that all communities, both urban and rural, have access to the most up to date mobile technology, given the clear sustainability, social and economic benefits for doing so. Indeed, Westminster has indicated that further reforms will take place to streamline the delivery process for critical infrastructure, which includes telecommunications.

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

- Economic benefits
 - Creating more productive and cost efficiencies for businesses
 - Businesses offering online services can extend their products to a broader audience
 - Local areas and businesses can benefit from tourists and visitors as hotels, attractions, and restaurants can be booked online from anywhere in the world
 - Business owners and services like doctors can provide a faster and more cost-effective service by offering both online appointments and ordering
 - Digital connectivity facilitates economic growth, something which the Government is keen to progress and promote
 - 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security will also facilitate learning on the job procedures, thanks to technologies such as Augmented Reality (AR) goggles, which, for example, can give the likes of engineers real-time instructions on how to fix a machine on a production line.
- Social benefit
 - Mobile communications can help people to stay in touch wherever and whenever, which can help improve social wellbeing
 - Convenient access to online commerce or businesses
 - Contacting emergency services is easier, especially in remote areas
 - Giving the ability to manage our personal finances and information 24/7
 - Using a mobile wherever you go can provide better personal security
 - Having access to social networking sites and applications can keep people entertained with their lifestyles and interests
 - Access to real-time transport information or timetables
 - Smart meter reads for utilities such as gas or electric
 - Contacting local authorities
 - Promotion of smarter and productive ways of working. For example, working from home can help minimise commuting which can provide better work and home life balance
- Sustainability and Environmental benefits
 - Facilitating remote access to services, education, and commerce, reducing the need to travel and in turn minimising carbon emissions.
 - Better monitoring and control of energy consumption through climate change technology, smart metering and smart energy grids.
 - 5G infrastructure requires fewer heat generating electronic components.
 - 5G enabling of the Internet of Things (IOT) sensor deployment can manage and alert us to pollution risks, health hazards and flood risk.
 - Provision of smart technologies within the agricultural sector will facilitate more efficient and less wasteful practices helping to limit negative impacts.

- 5G networks allow monitoring of traffic flow resulting in less congestion and better air quality. They also make driverless cars possible; a means of transport that offers better fuel efficiency.
- Smart cities and buildings can rely upon 5G networks to enable buildings and infrastructure to use automated energy saving through better and more efficient lighting, heating, cooling and other operations.
- Health benefits
 - Support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.
 - Patients across the country are now becoming accustomed to using remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.
 - 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.
- Education benefits
 - 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.



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