

PLANNING HERITAGE, DESIGN AND ACCESS STATEMENT

Site Ref:	Alexandra Palace	Applicant:	Virgin Media Limited and Telefonica UK Limited
NGRs:	E 383972 / N 397545	Date:	12 June 2026
Site Name:	Alexandra Palace	Type:	Listed Building Consent
Site Address:	Alexandra Palace, The Avenue, Muswell Hill, London N22 7AY		
Proposal:	The installation of 18 No. small cells (Dot antenna) positioned internally within the building and ancillary development thereto.		
Planning Agent:	Avison Young (UK) Limited		
LPA:	London Borough of Haringey		

Contents

1. Introduction
2. Design
3. Planning Policy Considerations
4. Technical Justification
5. Conclusion

Overview

Avison Young are planning consultants acting on behalf of Vodafone UK Limited and O2 UK Limited (VMO2) to submit the application contained herein for proposed telecommunications development.

Enclosed you will find an application for listed building consent on behalf of Virgin Media National Networks Limited and Telefonica UK Limited who is a licensed operator that provide Cellular Network based upon the Global System for Mobile (GSM) standard and Universal Mobile Telecommunications System (UMTS) within the United Kingdom.

The supporting documents submitted with this application are as follows:

Application Form (as generated through Planning Portal)

Drawings

Planning and Heritage statement

ICNIRP certificate.

We trust you will find the enclosed information sufficient to register and validate this Listed Building application. Should you require any further information please direct your queries to the below contact.

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1. Introduction

1.1. Background

Virgin Media Limited is a telecommunications company from Britain, founded in 2007, which provides telephone, television and internet services in the United Kingdom. It is owned by Virgin Media O2, a 50:50 joint venture between Liberty Global and Telefónica.

Telefonica UK Limited, trading as O2 is a British telecommunications services provider. It is owned by VMED O2 UK Limited, a 50:50 joint venture between Telefónica and Liberty Global.

1.2. Public Benefits

The proposed works subject to this application are to provide bespoke 4G and 5G coverage to this venue to ensure that the building has sufficient coverage for the operator even when there is an event on to ensure safety for everyone in the building and to ensure if there was an emergency that the emergency services could be contacted. The proposed system will greatly improve mobile coverage and capacity.

It is evident that mobile phone usage has grown exponentially over recent years as more than 90% of the population now own a mobile phone. Customers expect to be able to use their mobile phones and tablets in all locations as these devices have become intrinsic to our personal and professional lives and in this particular instance due to the concentrated levels of users in a small location the existing network is unable to cope. The small cells will therefore improve the capacity in the building by providing a bespoke coverage solution for this venue.

1.3. Sustainability

Following COP26 there is a greater emphasis on considering the effects of future developments on sustainability and climate change. This is a material consideration for local planning authorities, and it is therefore essential to highlight the positive effects of telecommunications development on such environmental matters. In relation to this, Mobile UK published a report entitled *Connectivity and Climate Change: How 5G will help lay the path to net zero*¹ released in October 2021. The report details a number of areas in which 5G technology will help to mitigate climate change as it supports key industries such as healthcare, manufacturing, agriculture, transport and energy to reduce their environmental footprints. 5G technology will allow energy production and energy use to be better monitored and planned; transport infrastructure will be smarter, meaning cleaner, shorter journeys; manufacturing production processes will be less wasteful; agricultural practices will minimise their negative environmental consequences; and healthcare services will be improved through the use of remote consultancy and other telemedicine innovations.

In a general sense, 5G will allow a greater efficiency in its own right when considering the consumption of energy and other resources. For example, one kilowatt-hour (kWh) of electricity is required to download 300 high-definition movies in 4G, but one kWh in 5G can download 5,000 ultra-high-definition movies. The monitoring capabilities that digital communications can offer allow usage rates to be closely monitored, which in turn leads to more efficient planning to save

¹ <https://www.mobileuk.org/news/cop26-landmark-report-highlights-how-5g-will-help-lay-the-path-to-net-zero>

energy and lower carbon emissions. A fast and strong digital connection is required to facilitate these means meaning the rollout of upgraded technology is necessary to continue the growth and development of areas locally and nationally.

Mobile operators are also making efforts to use renewable energy in their operations with a global ambition of reaching net zero emissions by 2050. Each individual code operator has set their own goals and business models for low carbon emissions to target innovative ways to reduce the dependency on fossil fuels. Such initiatives include adoption of zero carbon vehicles, increase the use of renewable energy, reduction of single-use plastic and other active engagement with suppliers and customers to reduce their overall footprint.

1.4. Site Selection

This is a bespoke solution for a venue that attracts high usage. The existing infrastructure in the area is unable to cope with the additional users on the network which results in dropped calls or not being able to join the network. By creating a bespoke coverage solution for this particular venue, it reduces the demand on the existing surrounding network.

EE have recently had a similar scheme approved and this scheme for VMO2 will emulate their scheme and proposes antennas alongside the approved scheme, this scheme will utilise existing equipment where possible and utilise the existing cabling where possible to minimise the impact on the building.

As Alexandra Palace is a Grade II listed building, VMO2 will ensure that the works to the fabric of the listed building are minimal and will follow the locations of previously approved equipment where possible. EE will provide the cables therefore additional cabling will be minimal, any cabling required will be positioned to reduce its visibility and will follow existing features or cable routes where possible. To reduce the impact on the listed building the mounting brackets proposed as part of the EE scheme will be utilised.

The 18 internal antennas have been positioned to ensure that there is adequate coverage within the building, existing coverage is as a result of the macro cells outside of the building but additional coverage is required within the building to provide coverage especially when the building is being used at capacity when there is an event on.

Each location has been selected based on the propagation levels and assessing where the levels are not adequate, the exact location of the antenna is then determined to ensure that no architectural features are being affected by the installation. Although some micro siting can be undertaken the general location of each antenna is fixed to ensure that the coverage is adequate.

The locations which have been selected are detailed in the drawing pack and are illustrated by the blue dots, the red dots are the approved EE antennas. The operator's general practice will always endeavour to propose the least impactful design possible to sufficiently achieve the desired coverage levels and follows similar locations to the approved EE scheme to limit the amount of equipment required and impact on the listed building. The dot antennas are small in scale and can be painted to match the area they are to be fixed to.

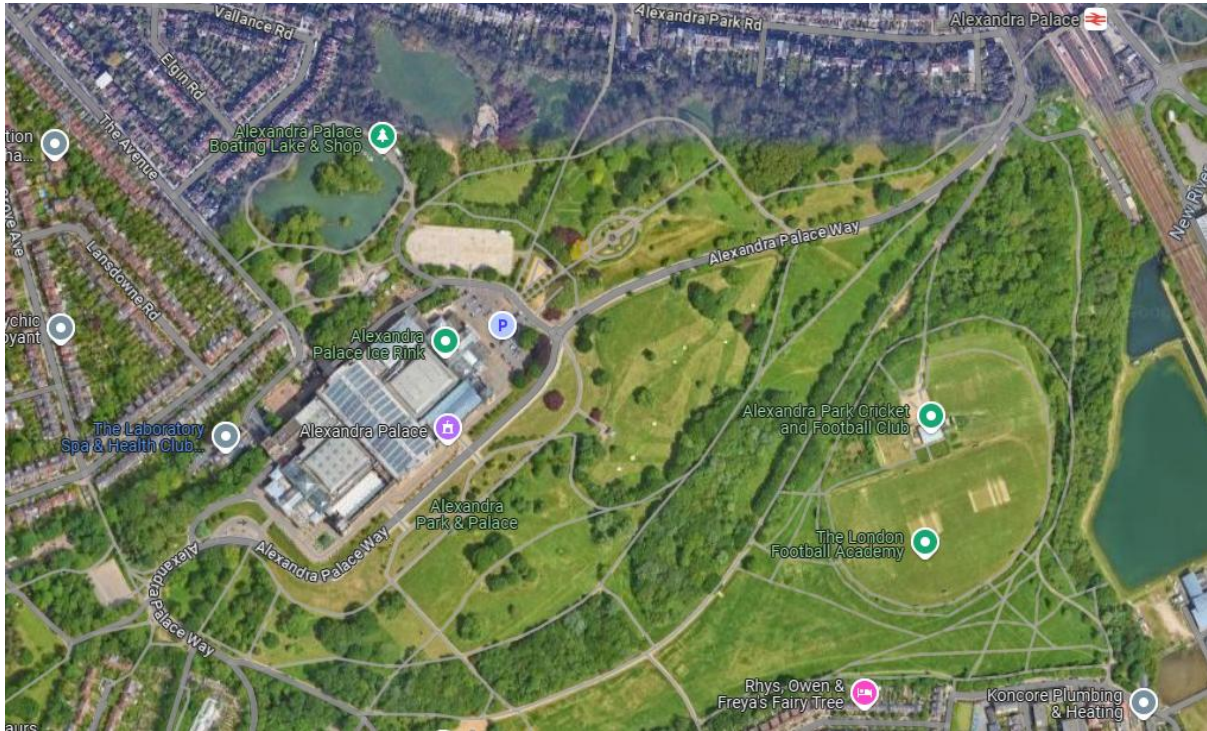
Due to this being a bespoke scheme, no alternative sites have been considered.

1.1. Application Site Details

Alexandra Palace is Grade II Listed and is located within Muswell Hill Conservation area. The building is situated in park land with residential properties beyond.



Above is the host building:



Above is the host building in context.

The building is Grade II listed; the following details of the listing below are taken from Historic England –

Official list entry

Heritage Category:

Listed Building

Grade:

II

List Entry Number:

1268256

Date first listed:

01-10 1996

List Entry Name: Alexandra Palace including former Alexandra Palace Station to North

Statutory Address:

Alexandra Palace including former Alexandra Palace Station to North, Muswell Hill, London Borough of Haringey N22

The building or site itself may lie within the boundary of more than one authority.

County:

Greater London Authority

District:

Haringey (London Borough)

Parish:

Non-Civil Parish

National Grid Reference:

TQ2959890039

Summary

Former International Exhibition Hall and 'People's Palace'. Rebuilt 1873-5 by John Johnson and Alfred Meeson following fire damage to the first building of 1868-73 by the same architects. Built by Kelk and Lucas. Restored 1980-88, following second fire in 1980, by the Alexandra Palace Development team led by Dr Peter Smith. Various C20 alterations before the second fire.

The former Alexandra Palace Station building of 1873 stands immediately to N of the Palace. No platforms or other associated structures survive.

Reasons for Designation

Alexandra Palace and the former Alexandra Palace Railway Station are designated at Grade II for the following principal reasons: * Historic interest: a rare survival of a large-scale Victorian exhibition and entertainment complex, and for the surviving BBC studios where the world's first high-definition television programme was transmitted in 1936; also the complete set of Victorian stage machinery in the theatre; * Architectural interest: for the surviving Victorian fabric and internal spaces, as described above * The former railway station has special interest as a well-detailed building in the Italianate style, and for close historical associations with Alexandra Palace; it has strong visual group value with Alexandra Palace

History

The spectacular success of the Great Exhibition of 1851 inspired similar events worldwide. The idea of a 'People's Palace' in north London was propagated by the architect Owen Jones (1809-76) who had designed much of the interior décor of Paxton's Crystal Palace. Although his plans for a vast iron and glass building never materialised (mainly on grounds of cost), in 1863, after five- or six-years' planning, a former dairy farm on high ground between Muswell Hill, Wood Green and Hornsey began to be developed by the Alexandra Park Co Ltd as a north London rival to the Crystal Palace. The building from the Great International Exhibition of 1862 was then being dismantled in South Kensington, and this was acquired by the company, although financial difficulties delayed its re-erection. Work did not actually begin until 1868 when parts of that structure, designed by Captain Fowke, were reused in the new building designed by Alfred Meeson and John Johnson. Only in 1873 did the Alexandra Palace open as 'The Peoples' Palace', a recreation centre and visitor

attraction for north Londoners. This was serviced by a new railway line from Highgate Station which terminated at a station alongside the north terrace. Two weeks later the palace was virtually destroyed by fire. A replacement building opened two years later, also designed by Meeson and Johnson. Covering seven acres it was centred on the Great Hall with its immense steam-powered Willis Organ, while four corner towers each supported 16,000-gallon water tanks supplied by steam pumps from the New River Company's reservoirs.

Palace and park faced successive financial difficulties, closure and changes in ownership. The theatre/music hall had been unsuccessful from the outset, partly due to poor sight lines and acoustics. No provision was made for moving scenery on or off stage. A mechanised timber stage was designed and installed by the Grieve family of stage carpenters and scenic artists and was ingeniously adapted to compensate for the idiosyncrasies of the theatre design. The theatre however only began to return a profit once film shows were introduced in the early 1900s, which also attracted more people to the palace complex. The Palace closed during the Great War; during this time, it was initially used to house refugees, including those coming from Belgium, and later for the internment of German prisoners of war. The theatre was refurbished under the management of W Macqueen-Pope and reopened in 1922, but it ceased to be used as a cinema the following year when it was leased to Archie Pitt - Gracie Fields' first husband - who used the stage for rehearsals.

The BBC's involvement with Alexandra Palace dates from June 1935 when it leased the eastern part of the building - 31,840 sq ft within the south-east wing and a further 24,525 sq ft comprising the theatre and associated rooms - following advice from the government-backed Television Advisory Committee that it was the most suitable site for the development of high-definition television, including the testing of two rival systems. To facilitate broadcasting, the cupola on the south-east tower was removed and a 225 ft lattice mast was erected, which gave an aerial height of 460 ft above sea level. Below, the tower was converted to offices and the colonnade arches were bricked up. On the ground floor two former coffee rooms became transmitter halls for the two companies, while the tearoom between them housed the shared transmitter. The first floor was converted to two studios separated by control rooms and rooms for film scanning, with dressing and make-up rooms across a corridor. Test transmissions took place in August 1936.

On 2 November 1936 the BBC introduced the first, regular, high-definition, 405-line television service in the world. Before that there had been episodic low-definition broadcasting in Britain and elsewhere, for instance in the USA and Germany. Later advances also took place there: tele-recording, colour broadcasting, the launch of the Open University, and video tape demonstrations.

Studio A was equipped with the relatively well-developed Marconi-EMI television system employing four Emitron cameras, Studio B with the more experimental and varied equipment installed by Baird Television Ltd. In January 1937 the decision was taken to adopt the Marconi-EMI system as the London Television Standard for the future of television. The Baird equipment was removed and by September Marconi-EMI equipment was in Studio B too. At the same time a Central Control Room was constructed in the former Baird Control Room to enable all programme sources - from the two studios,

outside broadcasts, and film channels - to be controlled separately. Almost immediately technical and production standards improved, and over the next two years the annual number of hours of television broadcast grew fourfold to over 900 hours in 1938. With this came an expansion in set ownership, which on the outbreak of war stood at 20,000 sets.

The BBC Television Service shut down two days before war was declared in September 1939, closing with a Mickey Mouse cartoon. Transmitters were adapted to radio counter-measures against German bombers, using settings derived from Enigma intercepts to jam or 'bend' German navigational radio beams known as the 'Knickebein', and later the X- and Y-Gerät Systems, thereby giving important protection to London and the Home Counties from Luftwaffe attacks, notably during the Blitz. This was one of a number of installations for this purpose.

Broadcasting resumed on the day of the Victory parade on 7 June 1946, and although take up was slow due to post-war conditions, there were technical advances such as the recording of outside events which, for instance, allowed film of the 1953 coronation to be rushed by plane to America. After the BBC acquired the former Gainsborough film studios in Lime Grove, Shepherd's Bush, Alexandra Palace closed as a production centre, apparently for good, in 1954. However, it reopened months later as the home of BBC TV News, which it remained until 1969, colour television being launched in 1967. Then, until 1981, Alexandra Palace was from where the Open University was broadcast.

In 1980 a second major fire seriously damaged the Palace (only Palm Court and the area occupied by the BBC escaped damage). After restoration of the central hall and west end the Palace reopened in 1988.

The former Alexandra Palace railway station was the terminus of a short branch line from Highgate station and stands immediately adjacent to the north-west of the Palace. It was built by the Muswell Hill Railway and opened in 1873 along with the Palace. In 1911 the line was taken over by the Great Northern Railway (GNR), becoming part of the London & North Eastern Railway (LNER) in 1923. In 1935 London Underground planned to take over the line from LNER together with the LNER's routes from Finsbury Park to Edgware and High Barnet, modernise it for use with electric trains and amalgamate it with the Northern Line. Works were completed from Highgate to High Barnet and Mill Hill East and that section was incorporated into the Northern Line, but further works on the Highgate and Alexandra Palace section were postponed and the line continued under the operation of the LNER. Wartime economies meant that services were reduced to rush hours only, so that after the war the dwindling passenger numbers, and a shortage of funds lead to the cancellation of the unfinished works. Passenger services to Alexandra Palace station and the other stations on the line ceased on 3 July 1954.

Alexandra Park is included in the English Heritage Register of Parks and Gardens of Special Historic Interest.

Details

MATERIALS: cast-iron and steel columns with walls of white Huntingdon and yellow stock brick embellished with patterned red brickwork in the Italianate style. Classical mouldings

and ornaments such as cornices, volutes, keystones, lions' heads etc. made of Portland cement.

PLAN: the Palace covers about seven and a half acres. Symmetrical plan about a great central hall which corresponds with the central transept of the original building and runs between the north and south frontispieces that survived from that building. Flanking the great hall were an Italian garden to the west and an exhibition hall to the east, beyond them were two conservatories. The entire south front was occupied by refreshment rooms including a large banqueting hall; the corresponding spaces on the north front held a concert room and a large theatre. Most of the internal walls defining this plan survive, but the roofs have been replaced, and open areas roofed over. The concert hall and refreshment rooms have gone. The theatre auditorium to the northeast and the BBC studios to the south, adapted from former refreshment rooms in 1935, survive.

EXTERIOR: north elevation: Least fire-damaged area. Central frontispiece with pedimented gable and large, recessed rose window (now blocked) above entrance porch which connected to the approach from the former railway station. East and west elevations: entrance fronts and vestibules behind largely rebuilt 1980-88 following original form and reusing structural ironwork in part. Palm Court entrance, now main public entrance, to west has pedimented gable and arcaded ground floor. South elevation: central pedimented and gabled frontispiece with large recessed rose window (reinstated after fire) above entrance porch. Patterned brickwork in gable. Arch flanked by tall three-light windows separated by half columns with segmental pediment above. Two storey, fifteen bay colonnade either side, divided into three sections and terminating in square towers. The upper colonnade is arched with stone columns, the lower has flat arches resting on brick piers. The tower at the southeast corner was adapted in 1935 to house offices and studios for the BBC with metal canted bays and the addition of a tall steel latticed girder mast on top.

INTERIOR: survival of the original interior is patchy. The principal areas of interest lie in the eastern part of the building: the theatre auditorium in the northeast and the television studios in the BBC wing in the south east corner. The theatre auditorium has fittings of interest dating from 1875. These include a balcony to the rear, a large raked stage, a proscenium with niches and, below the stage, a complete set of Victorian stage machinery designed by Messrs Grieve and Son. The machinery comprises a series of wooden bridges, traps, pulleys, and levers to enable large scene transformations in pantomime and melodrama, and the projection of props and actors onto the stage. It is the most pristine example in the country and therefore of particular special interest. Neoclassical decoration on either side of the auditorium dates from the 1920s when W Macqueen-Pope was manager. The former BBC studios 'A' and 'B' have historic rather than architectural interest. A significant feature in studio 'A' is the glazed control room or 'gallery'. Some original doors to the studios with brass porthole windows survive. To west of the studios the original staircase survives with ramped wooden handrail, turned balusters and chamfered newel posts. Some original cast-iron columns with capitals survive on the ground floor in this part of the building. Some areas of the Palace have been demolished and are therefore of no interest; these are the unroofed spaces at the southwest and north west corners, and the area occupied by the skating rink. The Great Hall has been renewed sympathetically following its almost total destruction in the 1980 fire. The columns and

glazed roof were not reinstated; instead a new pitched roof slung below tubular lattice girders was constructed, with a ceiling of tensioned acoustic fabric imitating a barrel vault. It is the overall spatial quality of this interior and that of the west hall which are of interest. The original Willis organ, restored in the 1980s, stands to the north of the Great Hall. The Palm Court to the west, originally a conservatory, escaped serious fire damage, has cast-iron columns and piers with foliated capitals. Roof has been reglazed.

FORMER RAILWAY STATION: now a community centre. The style is Italianate to complement that of the Palace. Small, single-storey building with gabled cross wing and pitched slate roof, built in white bricks with red brick banding and dressings. Round-headed keyed windows linked by string courses; segmental headed entrance. Rusticated angle piers. Cross wing has roundel in gable and moulded brick parapet. Moulded brick chimney stacks. The interior has no features of interest.

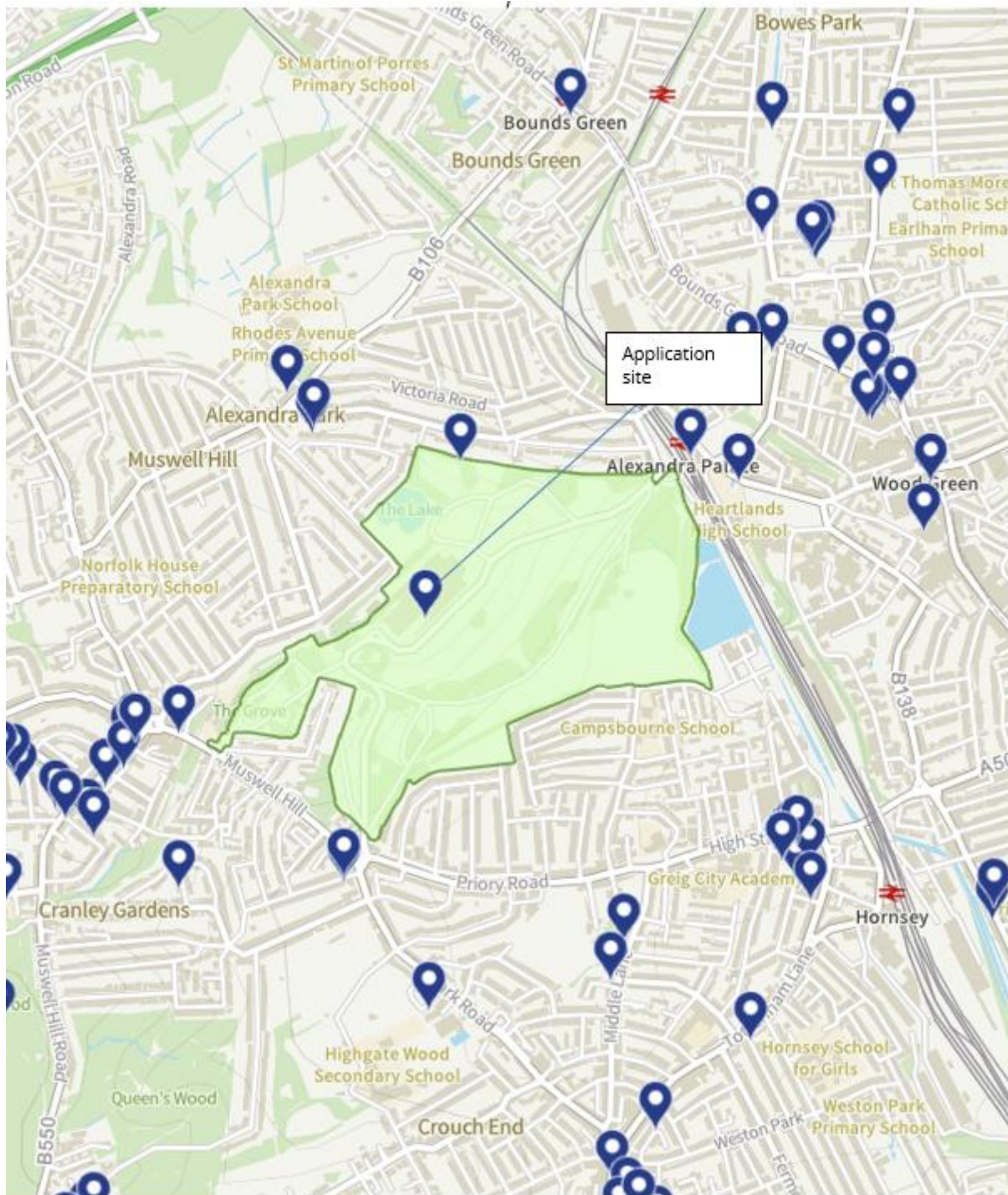
This list entry was subject to a Minor Enhancement on 4 September 2023 to amend the description and to reformat the text to current standards.

Legacy

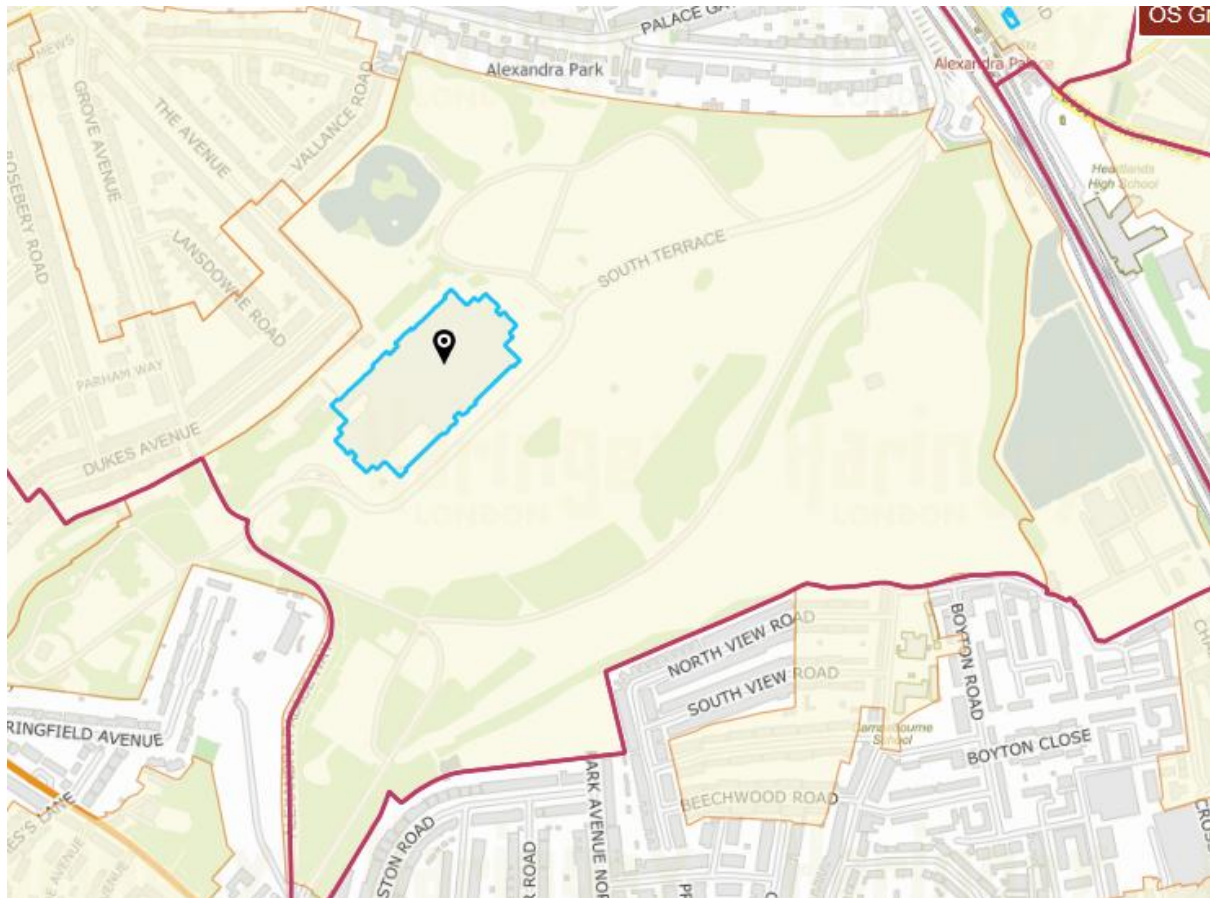
The contents of this record have been generated from a legacy data system.

Legacy System number:462017

Map of Listed Buildings in the surrounding area from Historic England



The Host building is located within a conservation area as detailed on the map below:
The blue outline is the host building, and the conservation area is marked by the yellow colour.



Whilst the application site is situated within a conservation area the scheme will not impact views into and out of the conservation area as the equipment will be positioned internally. Consequently, the application is capable of protecting the character and setting of this designation as there is little demonstrable impact caused as a result. This is of notable significance as the application is not considered to have a detrimental impact on the surrounding conservation area and the public benefits of the proposal will outweigh any perceived negligible visual harm to the host building and conservation area.

1.2. Pre-Application Consultation

A preapplication meeting was held between Freshwave the designers, The LPA planning officer Mark Chan, and the Conservation officer Elisabetta Tonazzi on 24th September 2025. Due to the existence of 29 small cells that are owned by BT the council wanted to understand why VMO2 require additional antennas and asked that the drawings overlay the heritage significance map to understand the antenna locations which are more sensitive. These maps have been overlaid onto our scheme drawings 205 - 209 and will be discussed in the design consideration section of this statement.

Design

1.3. The Proposal

The proposal concerns Alexandra Palace, The Avenue, Muswell Hill London N22 7AY. The works will comprise of the installation of 18 No. small cells (Dot antenna) positioned internally within the building and ancillary development thereto.

As the works are for alterations to a listed building the scheme falls within Planning (Listed Buildings and Conservation Areas) Act 1990

The following section will assess the design considerations of this proposal in further detail though it is considered that the works are sympathetic to the listed building.

1.4. Design Considerations

The proposal does not impact on the exterior of the listed building as all antennas are located internally within the building.

The 18 internal antennas have been positioned to ensure that there is adequate coverage within the building, existing coverage is as a result of the macro cells outside of the building and some internal antennas within the general area which provide in building coverage but additional coverage is required within the building to provide coverage especially when the building is being used at capacity when there is an event on.

Each location has been selected based on the propagation levels and assessing where the levels are not adequate, the exact location of the antenna is then determined to ensure that no architectural features are being affected by the installation. All the antennas have been plotted onto the heritage maps as detailed on drawings 205,206,207,208,209 rev A.

The locations which have been selected are detailed on drawings pages 200,201,202,203,204. The operator's general practice will always endeavour to propose the least impactful design possible to sufficiently achieve the desired coverage levels. The cables will be hidden as far as possible by being laid inside cable containment where available. The cables are to be clipped to the ceiling locations where there is no containment and will as far as possible not be visible, in addition where possible the EE cabling will be utilised to further reduce the amount of works required.

The dot antennas are small in scale and circular measuring 210 mm as detailed below.

Dot 4475



High-capacity triple-band multi-RAT Dot

• Compact design → 1.8 L / 1.5 kg • Most energy efficient → ~ 55 W • Supports fiber and hybrid fiber cable with the RFX unit • CAT-6A 100m support • High capacity for 2G+3G+4G+5G → 100 MHz IBW on TDD band → Full band IBW on FDD bands • Compatible with IRU 16xx for multi-operator and high capacity • Compatible with IRU 8848 for lowest triple-band TCO • Multi-operator use cases	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Max Throughput:</td> <td>~ 3 Gbps</td> </tr> <tr> <td>RAT:</td> <td>NR, LTE, WCDMA, GSM</td> </tr> <tr> <td>IBW/TCBW:</td> <td>100 + 60 + 75 MHz</td> </tr> <tr> <td>Output power:</td> <td>4x24 dBm (4x250 mW) TDD 4x21 dBm (4x125 mW) FDD</td> </tr> <tr> <td>MIMO:</td> <td>4T4R TDD, 2x 2T2R FDD</td> </tr> <tr> <td>Antennas:</td> <td>8 built-in omni-directional</td> </tr> <tr> <td>Total Antenna BW:</td> <td>670 MHz</td> </tr> <tr> <td>Type of cooling:</td> <td>Passive</td> </tr> <tr> <td>Mounting:</td> <td>ceiling / wall mounting</td> </tr> <tr> <td>Dimensions:</td> <td>210 mm diameter</td> </tr> <tr> <td>Operational temp:</td> <td>+5°C to +40°C (41°F to 104°F)</td> </tr> </table>	Max Throughput:	~ 3 Gbps	RAT:	NR, LTE, WCDMA, GSM	IBW/TCBW:	100 + 60 + 75 MHz	Output power:	4x24 dBm (4x250 mW) TDD 4x21 dBm (4x125 mW) FDD	MIMO:	4T4R TDD, 2x 2T2R FDD	Antennas:	8 built-in omni-directional	Total Antenna BW:	670 MHz	Type of cooling:	Passive	Mounting:	ceiling / wall mounting	Dimensions:	210 mm diameter	Operational temp:	+5°C to +40°C (41°F to 104°F)
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Product colour: Gray; NCS S 1002-B

Product dimensions:
67mm (height)
210mm (width)
210mm (depth)

Volume 2L
Weight: 1.60kg

Though it is recognised that a telecommunications site will to a degree be recognisable in any given environment, the visibility of equipment does not automatically lead to detrimental harm as each site must be assessed on its own merits and balanced against the public benefits to be provided in accordance with national planning policy. In this respect significant weight should be given to improving coverage to ensure safety in venues such as this where currently the existing macro cells in the area can not provide the required coverage and an internal bespoke scheme is required to ensure that there is adequate coverage which can meet demands when there is a capacity crowd at the venue. Digital connectivity is an essential utility provider in today's society and a high-quality service must be provided by the operators in accordance with license obligations.

Siting and Appearance

The antennas have been carefully positioned to ensure that they do not impact on architectural features within the building and are in similar locations to the approved EE antennas.

Assessment of antennas and heritage plan:

Basement – no antennas proposed.

Lower Ground Floor – The antennas are located in the newest part of the building within the 1980 Post Fire area. There will therefore not be any impact on the original building.

Level 3 (ground) – The antennas are located in 3 locations, the transmitting Hall, Pheonix bar and Kitchen which are the original part of the building dating back to 1875 and the west yard which is 1980 post fire.

In these more sensitive areas the antennas have been carefully positioned to be located on areas that are not as sensitive and to ensure that they do not have a detrimental impact on the architectural features of the building.

Level 4 (Level1) Various locations are identified which are located in all the different Heritage areas of the building, due to the fact that the antennas need to be located in all the locations of the building to provide coverage and to ensure there are no “not spots” where there is no coverage. The antennas are positioned carefully and alongside the approved EE scheme, where possible the antennas will not be attached to the original building as detailed in drawings 300-315.

Level 5 (Roof level) – The antennas are located within the Auditorium Void which is within the 20th century heritage area. The antennas have been carefully positioned so that they do not affect the original fabric of the building.

2. Planning Policy Considerations

Development Plan Policy Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

2.1. Local Planning Policy

The following local planning policies are relative and have been considered in the submission of this application. It is argued that the proposal is in accordance with the below policies which promote high-quality connectivity and supports new telecommunications infrastructure when it can be demonstrated that the design and siting of the base station is respectful to its surroundings.

Haringey Local Plan Strategic Policies 2013-2026 (Adopted March 2013)

Policy SP0 Presumption in Favour of Sustainable Development

In line with this policy, developments such as this proposal are supported as they encourage the positive growth of the area in social and economic terms. The public benefits to be provided will result in an improved mobile coverage in the area by creating a bespoke coverage for the host building reducing the amount of traffic to the existing sites in the area, which will increase the connectivity and accessibility for local residents, businesses and visitors to the area. Where it can be demonstrated that local and national planning policies have been followed, such planning applications should therefore be approved without delay.

Policy SP11 Design

With reference to Policy SP11, the proposed scheme is of a high quality design which will have a positive effect on the digital communication of the local area. Consideration has been given to the existing context to ensure the works are appropriate to the local character and is sympathetic to the host building.

Policy SP12 Conservation

The applicant recognises the importance of local heritage assets such as conservation areas and listed buildings and has made efforts to avoid any undue harm caused to these sensitive designations. As discussed previously the minor development works have been positioned and designed to be the least impactful on the current setting in recognition for these important historical features within the host building. In this regard the applicant considers the proposal to be in line with this policy as the application will seek to preserve the character and setting of these assets, whilst also maintaining the aesthetic views and accessibility to these places.

The proposal will provide bespoke coverage for the building itself and will relieve the amount of traffic to the existing macro cells which will negate the need for additional masts in the locality which could have a greater impact on the listed building and conservation area. In this respect the proposed works subject to this application demonstrates little impact on the

host building and surrounding area and therefore accords with the principle of this planning policy.

Development Management DPD (Adopted July 2017)

Policy DM1 Delivering High Quality Design

Similar to the principles stipulated in Policy SP11 of the Borough's Local Plan, the application site has been designed with high quality materials and minimal equipment to protect the visual amenity of the local area. All antennas are located internally within the building and have been positioned to ensure that they do not conflict with the architectural features of the building.

Policy DM9 Management of the Historic Environment

In line with this policy and with reference to Policy SP12 of the Local Plan, the proposed development has been designed to be sympathetic to the listed host building. These points have been discussed earlier in the previous section of this statement which has examined whether any undue harm is caused to these sensitive designations. As supported in this policy the proposal has been designed to ensure the works do not have a detrimental impact on the host listed building.

Policy DM54 Facilitating Telecommunications Development

The antennas are all located internally within the building, they have been carefully positioned so as not to obstruct architectural features, will be painted to match and will utilise the EE's equipment where possible. As this is a bespoke solution no other sites have been considered. It is considered that the public benefits of deploying this site outweighs any perceived negligible harm to the host building.

It is therefore considered that the proposal complies with Local Plan policy.

2.2. National Planning Policy

The National Planning Policy Framework was revised in December 2024. In relation to this policy the following sections are relevant in determining this application:

Section 2 – Achieving Sustainable Development

Paragraph 7 – *“The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”*

The NPPF also encourages the achievement of sustainable development which can provide public benefits to building stronger and more competitive economic areas, as well as enhancing social communities through increased communication and connectivity. These benefits feed into the overarching economic and social objectives of the NPPF.

Section 4 – Decision-Making

Paragraph 38 – *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield*

registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible."

Section 6 – Building a strong, competitive economy

Paragraph 81 – *"Significant weight should be placed on the need to support economic growth and productivity... This is particularly important where Britain can be a global leader in driving innovation."*

Section 10 – Supporting high quality communications

Paragraph 119 – *"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections."*

In relation to these paragraphs, the Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK and sets out a delivery programme to make the UK a leader in *"artificial intelligence and big data"*. The improvement of telecommunications capacity and provision of 5G is imperative to allow for areas to be connected and is essential for economic growth which is expected to be delivered and upgraded over time.

Paragraph 120 – *"The number of radio and electronic communications masts, and the sites for such installation, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate."*

In relation to this paragraph, it has demonstrated in section 1.4 that a sequential approach to site selection has been adopted to ensure that existing telecommunications installations have been explored in the first instance to prevent unnecessary proliferation of masts. In this particular case there were no existing structures which could be upgraded and this proposal is to provide bespoke coverage which will relieve the pressure on existing sites and negate the need for an additional macro cell in the area.

Paragraph 121 – *"Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:*

- a) They have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*
- b) They have considered the possibility of the construction of new buildings or other structure interfering with broadcast and electronic communications services."*

Paragraph 122– *“Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:*

- a) The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and*
- b) For an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or*
- c) 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.”*

In relation to this paragraph, the proposal is all internal and is for small cells and therefore does not affect an aerodrome or safeguarding area. The local ward councillors and the LPA were consulted. An ICNIRP certificate is provided with this application to confirm that the proposal will not exceed International Commission guidelines.

Paragraph 123 - *“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.”*

Section 12 – Achieving well-designed places

Paragraph 131 – *“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*

Section 16 – Conserving and enhancing the historic environment

Paragraph 207 – *“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.”*

Paragraph 214 – *“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss...”*

Paragraph 215 – *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*

It is considered that the proposal is in accordance with these paragraphs as the application has been designed sensitively to be respectful of the identified heritage asset. Considerable efforts have been made to ensure the least amount of potential impact is imposed when balanced against technical constraints and the advancement of digital connectivity carries significant weight when considering the public benefits to be provided. Mobile operators are obligated to provide high quality connectivity across the country as a licensed utility provider in which sensitive heritage assets and land designations are often unavoidable circumstances to ensure high quality coverage can be provided to all areas of the country.

In relation to this paragraph the proposal is well designed and will not be visible in the surrounding area.

2.3 Planning Practice Guidance

Design: Process and Tools

In parallel with Section 12 of the NPPF, developments must be well-designed where it can assimilate into its local surroundings and support the broader characteristics of the local authority. The proposed application submitted herein demonstrates compliance with this guidance as the 10 design characteristics have been taken into account in the design considerations of this proposal whilst also balancing the technical requirements of the site to ensure the technical objectives can be achieved.

Historic Environment

In addition to Section 16 of the NPPF, Planning Practice Guidance echoes the importance of conserving historic environments and the need for a flexible and thoughtful approach to get the best outcome. The PPG outlines that an understanding of an asset's 'significance' is integral to determining the potential impact and acceptability of proposed developments and 'significance' is defined as follows:

"'Significance' in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting."

When applying this approach to the proposed scheme herein, the applicant has analysed the significance of the relevant asset(s) in question which has informed the overall design of the proposal accordingly. When balancing the potential impact of the proposal it is considered that these effects would not detrimentally harm the significance of the asset in terms of its character and setting due to the minor scale of works involved and the important context of the site being an existing and established base station that was deemed acceptable in its inception. In instances where such perceived harm may be apparent it is essential that the value of public benefits is given significant weight in the balanced consideration of the scheme. Within the context of improvements to the telecommunications infrastructure, the public benefits are far-reaching insofar as local residents, businesses and travellers across a large target coverage area are rewarded as a result of the proposed works.

2.3. Code of Best Practice for Wireless Network Development in England 2022

The Code of Best Practice is a guidance document created by the Department for Digital, Culture, Media and Sport, which aims to support the government's objective of delivering high quality wireless infrastructure whilst balancing the needs of environmental considerations. This document has been developed in collaboration with mobile network representatives, other government departments, public bodies, local planning authorities and protected landscapes. 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 guidance aligns the agreed principles between operators and local planning authorities in respect to the siting and design of network infrastructure to outline the roles and responsibilities of both parties throughout the application process. Within this document it is recognised that digital connectivity is vital to enable people to stay connected and businesses to grow, and there is particular emphasis on the 5G rollout and future mobile generations, which will be vital for a range of uses and future smart city applications. Much of the principles in this guidance reflect those already highlighted in the NPPF however, there are notable excerpts to highlight for the council's considerations in the determination of this application.

With reference to Paragraph 19, the local planning authority is *"encouraged to 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)."*

When considering the siting and design of any given proposal, Paragraph 22 states, *"The choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible."*

Moreover, Paragraph 29 states, *"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 and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.*
- *In rural areas, base stations often need to cover wider geographic areas. Operators may need to use tall masts or lattice towers to provide the required coverage. The location of masts can sometimes be dictated by access to transmission links back to the operator's main network and*

proximity to a power supply. Coverage in some areas can be limited because of the geography, topography and terrain."

The guidance also provides further explanations for technical and operational considerations as below:

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

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

2.4 The London Plan 2021

The Plan recognises the strategic importance of providing necessary infrastructure, including modern communications networks that London requires to secure its long-term economic growth. The proposed works will improve digital connectivity to the benefit of Londoners and businesses. The site will ensure a high level of connectivity is sufficient to meet the rising demands of reliable data and services of the public as well as safeguarding the reduction of coverage within the surrounding area. This application is therefore an integral element in securing the Mayor's vision for the delivery of modern communications networks across London.

With particular reference to Policy SI 6 (Digital Connectivity Infrastructure), the applicant is committed to fulfilling network obligations to cater current and future demands to ensure high quality coverage is provided which continues to be faster and stronger. In line with this policy the applicant has also demonstrated efforts to utilise existing base stations, rooftops or other structures prior to identifying new locations to fulfil network objectives. Ongoing network upgrades are an essential aspect of London's global competitiveness which is recognised in the latest Plan.

This is reiterated in the *London Plan Guidance – Digital Connectivity Infrastructure (October 2024)*, which offers help to planning officers when determining telecommunications applications and also provides guidance on the preparation of new Local Plans. Within this document there is an understanding that development proposals are necessary to meet the expected demand for digital connectivity, which subsequently requires an appropriate use of rooftops and the public realm to accommodate well-designed and suitably located infrastructure. This is demonstrable in this application as the applicant has adopted a sequential approach to site selection and has conducted suitable pre-application consultation in accordance with this guidance. The applicant has also carefully considered the potential effects of the proposed design on a variety of factors including, visual amenity, transport safety, heritage preservation and overall site functionality and futureproofing to ensure the best scheme is pursued.

The guidance also explains the importance of addressing capacity shortcomings which is noteworthy for the context of base station upgrades such as this site. *“As demand for digital infrastructure in a location increases (for example, when a new development is occupied) the capacity provided by a mast site can be used up. This effectively ‘shrinks’ the coverage area around the mast. In some cases, it can cause gaps in coverage between the serving mast and adjacent masts, requiring corrective action to plug the gap.”* A range of corrective actions can be implemented including the maximisation of existing base stations and the introduction of new monopole sites (commonly referred to as streetworks) that can add much needed capacity to the network.

With these technical parameters in mind the applicant has pursued an acceptable design that is suitable and respectful of the surrounding area in accordance with this guidance.

2.5 London Growth Plan

Improvements to telecommunications infrastructure is a necessary component that helps to support growth and this is all the more important for our capital city. The London Growth Plan sets out a 10 year strategy for growth across different sectors and within this plan there are notable excerpts which emphasise the essential need for high quality digital connectivity to facilitate different areas of growth.

Page 17 – *“Londoners benefit from better digital connectivity at home, for work and on the move. We can do this by encouraging investment in fibre and mobile infrastructure.”*

Page 51 – **“Digital is everywhere** – *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.”*

Page 81 – *“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.”*

Page 83 – *“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 wifi access easier, by working in partnership with industry.”*

Page 84 – **“Publish a London Infrastructure Framework.** *The 2025 London Infrastructure Framework will identify future needs and priorities in transport, energy, water and flood defences, digital connectivity and data centres.”*

2.6 London Infrastructure Framework

The London Infrastructure Framework is a collaboration between the Mayor of London and London Councils which establishes a shared long-term vision for London’s critical economic infrastructure priorities through to 2050. A key component of this framework is the provision of high quality digital connectivity which “underpins London’s attractiveness as a global centre for

business". This demonstrates the importance of valuing development proposals that seek to improve and enhance existing telecommunications infrastructure throughout London. The digital connectivity sector is vital for driving inclusive growth and productivity, supporting housing and regeneration and supporting smarter city operations that build resilience for associated critical services. It is also necessary to emphasise the interdependency of this sector and the other utility sectors that will be prioritised in the Framework which are: Transport; Energy; Water, Wastewater & Flood Risk; and Waste. Consequently, the improvement of one sector will have advantageous effects on the other Framework priorities as a whole.

"Looking to 2050, London must have ubiquitous full fibre coverage, accelerate universal and high capacity industry standard cellular services, secure resilient power and connectivity for data-intensive growth areas and data centres, and close the digital divide so every household and firm benefits."

Trends – "02. Mobile data demand is rising sharply, with fourteen fold growth expected by 2035, requiring significant 5G upgrades, new delivery models and improved indoor and high footfall coverage."

Challenges – "02. London faces a widening mobile performance gap, with poor indoor coverage and inadequate mobile capacity around transport hubs, commercial centres and high streets. Low approval rates for infrastructure, slow small cell adoption and site loss from redevelopment reduce network reliability."

The application submitted herein seeks to address the challenges identified in the Framework which will result in much needed improvements to existing coverage provisions within this area of London. As explained throughout this statement, the high volumes of data traffic around the application site is typical of other areas around London and each single base station must be robust enough to handle high capacities without affecting signal latency. The deployment of the latest radio technologies will thus ensure the network infrastructure can handle current and future network demands which should carry substantial weight in the assessment of this application. Such developments also align with the Framework's digital priority scheme which should not be undervalued.

*"Digital priority schemes focus on strengthening London's foundational digital infrastructure by addressing broadband gaps, **Improving Mobile Connectivity**, supporting the delivery of **High Capacity Connectivity** for growth areas, and **Enhancing Digital Systems for Public Services**; together, these schemes improve network resilience, reduce digital exclusion and ensure London has the secure, modern and inclusive digital backbone needed to enable future economic growth, innovation and service transformation."*

"Digital Connectivity and Growth Scheme – Delivers fibre and mobile infrastructure to support growth sectors and high-density development, future-proofing housing, commercial activity, public services, and data centres. Incorporates investment to address London's low 5G performance and capacity constraints by enabling new mobile sites, small cells, and 5G upgrades. The combined programme strengthens connectivity, resilience, security, and supports inclusive economic growth."

2.7 Other Notable Reports and Reviews

The following reports highlight the importance of 5G technology. The recent pandemic has also shown an increased reliance on connected services due to the need for home-working and home-schooling, which is likely to continue in the post-pandemic era to an extent. It is therefore essential for mobile network operators to provide a reliable and resilient service to facilitate these needs, as evidenced in their significant contributions in the global response to the pandemic. Staying connected has become a defining feature of the modern economy and a significant trend of the 21st Century. Therefore, 5G will prove fundamental to fulfilling the potential of digital connectivity and will help drive the economy after the COVID-19 outbreak. For example, within the healthcare sector, hospitals and medical experts will have the ability to connect in real-time with their patients to diagnose and treat disease at the first point of contact to improve patient care. In terms of commercial benefits, manufacturers will look to leverage robotics, artificial intelligence (AI) and superfast connectivity to enable the remote management of production lines and to support the faster reconfiguration of factories.

Online Nation 2024 Report

This Ofcom report looks at the current online landscape of the UK and outlines statistical evidence that shows how internet use has grown over time. These figures are an indication of the current network demands being experienced and explains why existing mobile network infrastructure needs to be improved to provide high quality coverage that is also fast and strong to its customers. Such network improvements can subsequently allow more users the freedom to undertake a variety of online tasks that are part of our everyday lives such as working from home, online banking, video calling, virtual classrooms, seeking medical assistance, etc. A few key statistics are noted below:

- *In May 2024, UK adults spent an average of 4 hours 20 minutes a day online, across smartphones, tablets and computers.*
- *Search engines are still widely used; 90% of UK online adults visited at least one of the top ten highest-reaching search engines in May 2024.*
- *Over half of UK online adults visited NHS online in May 2024.*
- *Fifty-seven per cent of UK internet users aged 16+ said they had used a cloud storage service in the past week.*

Connected Nations UK Report 2025 (Published November 2025)

"Consumers and businesses rely on good connectivity – whether at home, at work or on the move. We want to ensure that UK consumers have access to high quality networks, to enable a wide range of digital services which drive economic growth. The Connected Nations report, prepared and published under the Communications Act 2003,¹ helps us monitor the availability of these networks and provides data to help stakeholders understand the networks which are available in their area."

"To ensure that people and businesses can derive maximum benefit from an increasingly digital society, connectivity must also be secure and reliable."

"Mobile data use continues to rise, increasing by 18% over the past year to a total of 1,257 petabytes (PB)² for the month of July 2025, a growth rate broadly consistent with the previous year."

5G traffic saw the largest growth, rising to 348 PB this year from 227 PB last year, an increase of 53%. 5G SA now accounts for nearly a third of total 5G traffic, reflecting a transition from earlier 5G non-

standalone deployments. 4G remains the dominant mobile technology, accounting for 72% (902 PB) of total monthly data traffic.

The transition away from older mobile network technologies continues. We estimate that there are still around two million direct customer devices reliant on 2G/3G networks. Two MNOs have completed their 3G switch-off and all operators have committed to retiring their 2G networks by 2033 at the latest."

"Progress in 5G geographic coverage also continues, albeit at a more modest pace. As of 2025, overall 5G coverage across the UK geography stands at 65% at the High Confidence level and 54% at the Very High Confidence level - up from 60% and 48%, respectively, in the previous year." This statistic indicates that there is considerable room for improvement to ensure that high quality 5G coverage can be accessible throughout the country.

"Monthly mobile data traffic has continued to grow at a rate of approximately 18% year-on-year, broadly consistent with last year, with total monthly traffic rising from 1069 PB to 1257 PB. Notably, much of the overall growth can be attributed to increased 5G usage, with 5G traffic now accounting for approximately 28% of total reported monthly mobile data, up from 21% in the previous year.

5G traffic has shown the highest growth, increasing by approximately 53% to reach 348 PB in 2025. In contrast, 4G traffic grew by 9% over the same period, highlighting the shift towards 5G usage. Within this, 5G SA now accounts for approximately 31% of total 5G traffic. This growth has been driven by a device pool that now includes at least 66% 5G-capable handsets (with 63% of those 5G handsets now supporting 5G SA), a modest increase from at least 50% in 2024." This data demonstrates the demand and reliance on 5G technology in today's society which reflects the importance of ensuring telecommunications infrastructure is kept up to date with technological advances.

This application site is located within a vital area where network provisions must be enhanced to allow people to work at home, to allow schools to teach online and to enable better accessibility in all parts of the country, which will in turn relieve pressures for home-working and e-learning. As outlined in the report statistics, there is increased demand on 4G and 5G coverage which has seen consistent annual growth. Such demands will require network infrastructure improvements to adequately serve its customers as well as futureproofing the network for years to come.

Ofcom Mobile Matters Report (July 2025)

Using crowdsourced data, this Ofcom report analyses people's experience of mobile networks across the UK to help identify areas of improvement. Ofcom recognises the essential services that mobile coverage enables and how society has become reliant and expectant for continuous high quality mobile coverage throughout the country.

The report has compared the data to results to previous years and it was discovered that across several performance metrics there was year-on-year decline, including data connection success rates. Whilst these performance metrics had no significant impact on the end user, it is still meaningful in illustrating the potential vulnerabilities of existing infrastructure and proves that there is a necessity to improve robustness and resilience.

The public benefits of the 5G rollout was also evident in the data results as download and upload speeds were far better compared to older generation technologies. In video streaming tests along

98.2% of 30-second video streams completed without interruption over 5G. This is compared with 96.6% over 4G and 88.3% over 3G.

Specifically in relation 5G Standalone networks, the data results also demonstrated the benefits of such services as it provided significantly higher download speeds when compared to 5G non-standalone areas (70% of 5G standalone download speeds measuring at 100Mbit/s or higher versus 46% for 5G non-standalone). When downloading file sizes of 2MB, 5MB and 10MB the download speeds via 5G standalone were also found to be 45% faster. These statistics underline the high extent of public benefits that can be achieved through infrastructure improvements such as this application.

Following on from this, the statistical comparisons between urban and rural areas highlight a sharp disparity that sees rural areas requiring vast improvements in order to match the same coverage levels as urban areas. For instance, the proportion of connections via 5G networks in urban areas reaches 29.5% compared to the 18.8% of rural areas.

The report further highlights the capacity challenges of base stations as it states, *“Although ‘mobile network coverage’ refers to the geographic area where mobile services are available, being within a coverage area does not guarantee a successful connection. Issues such as weak signal strength, network congestion due to high traffic, and service outages can limit or prevent access.”* Consequently, the operators must build sufficient resilience into their network to help avoid these vulnerabilities that can affect the user experience.

UK Digital Strategy 2022

“Digital infrastructure plays a vital role in our daily lives and is the foundation of a thriving digital economy. 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. This is why enhancing digital connectivity is Mission Four of the Government’s Levelling Up White Paper. Our goal is to ensure that everyone, wherever they live or work in the UK, can access the connectivity and services they need for the ever-digitising world.”

“A competitive and innovative digital economy will ensure the UK continues to be considered one of the most innovative countries worldwide and a competitive environment where technology businesses of all sizes can thrive.”

UK Infrastructure: A 10 Year Strategy (June 2025)

This infrastructure strategy sets out a new approach by the UK Government in their long term investment for improved infrastructure across the country, which will have positive benefits in both economic and social capacities. This is in recognition of the important role that infrastructure plays in enabling growth and raising living standards.

“3.37 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.

3.38 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.

3.43 The UK is currently undergoing a transformation of its digital infrastructure. 5G is being rolled out across the country and old copper broadband networks are being replaced with new gigabit capable connections.

3.46 The government is committed to removing barriers to the deployment of fixed infrastructure so that the commercial market can deliver as far and as fast as possible. This includes:

- Implementing the remaining provisions of the Product Security and Telecommunications Infrastructure Act 2022 as soon as possible.*
- Bringing forward a more flexible permitting system for street works across England, if the ongoing trials are successful.*
- Easing the process for gigabit deployment for leaseholders in multi-dwelling units, such as blocks of flats, and consulting on proposals as soon as possible.*

3.49 Businesses and critical national infrastructure also use digital infrastructure connectivity to provide products and services. To enable businesses and infrastructure providers to know when they need to upgrade, the government will work with industry to set out a forward-looking connectivity timeline. This will allow better planning of upgrades as part of regular research and development and/or lifecycle replacement, improving economic efficiency, saving public and private money and reducing the risk to life and critical services from upgrades.

3.50 High quality mobile coverage is now a necessity. Yet in many places coverage remains patchy and unreliable. The government has therefore asked Ofcom to provide accurate, public reporting on mobile coverage and performance. Ofcom have committed to launching their improved online coverage checker in June 2025.

3.52 The government's ambition is for all populated areas to have standalone 5G by 2030, delivered through commercial investment. It will enable a range of new industrial applications across the economy, including in manufacturing, broadcasting, public services, transport and logistics. An Analysys Mason study found that 5G adoption in key sectors could realise up to £37 billion additional Gross Value Added in the period from 2022 to 2035."

The UK Government Resilience Action Plan (July 2025)

This action plan recognises the vital role that digital infrastructure plays as part of the UK's critical national infrastructure. The effects of Covid-19 highlighted the immense public benefits of digital connectivity and our reliance on digital infrastructure to communicate with each other on both a social and economic level. This reliance however, also showed the vulnerabilities of existing systems and technologies that can be more susceptible to significant national risks that affect our everyday lives such as public service disruption and cyber-attacks. It is therefore of paramount importance that utilitarian infrastructure networks such as telecommunications are reinforced and improved to become more resilient and robust.

"Empowering and supporting this network of organisations to operate at their best is fundamental to our approach, and this action plan focuses on where we can maximise their efforts, including through the use of science and technology."

"The resilience of the UK's CNI [Critical National Infrastructure] 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."

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

"The UK government has undertaken a strategic overhaul of its approach to resilient telecommunications, which are paramount to respond to a National Power Outage and other national security risks. This has included a recent investment in ensuring our resilient voice capability, situated across the UK to enable a means of information flow across the local and national level, is fit for purpose and is now exploring opportunities to augment our capabilities with the addition of resilient data provision."

**Sir Chris Bryant MP Minister of State Department for Science, Innovation & Technology
Letter to Council Leaders (Dated 29th November 2024)**

This letter confirms the importance of fast and reliable connectivity and the Government's commitment to supporting the delivery of next-generation connectivity across the UK by supporting the implementation of the latest technologies and driving towards nationwide 5G coverage by 2030. In order to achieve these objectives there is a call for councils to prioritise and recognise the value of digital infrastructure improvements when engaging with telecommunications proposals.

A Councillor's Guide to Digital Connectivity – published by the Local Government Association, September 2019

"With better access to high speed and reliable broadband and mobile connections, local communities can access public services more conveniently and purchase goods online at a lower cost. People can work from home, cutting out their commute and improving their quality of life. Businesses can grow, become more productive, sell their products in a global market and access a raft of services not available to those offline. Tourists can find out more information about local attractions and share photographs of their experiences with friends and on social media. In contrast, areas stuck in the digital slow lane are less attractive places to live, work and visit, and risk being left behind as other areas reap the benefits of our digital revolution."

5G will enable exciting new services and applications including:

- *faster mobile broadband and a more consistent experience in congested areas with a very high number of devices*
- *industrial applications, enabling businesses to improve their productivity, for example through predictive maintenance and real-time analytics*
- *Internet of Things (IoT) services, many of which will help councils and businesses deliver services more efficiently including:*
 - *transport and logistics: connected parcels and fleet tracking*
 - *health and social care*
 - *environmental monitoring: sensors monitoring air quality and water pollution in real-time*
 - *smart agriculture and smart animal farming, smart retailing*

- *connected and autonomous cars: allowing cars to communicate with each other, o other road users and even the road infrastructure."*

In summary, it is our opinion that the proposal meets all local and national policy requirements.

3 Technical Justification

In the assessment of this application, material weight should be given to the public benefits that will be provided to local residents and visitors in this area. The site will form part of an improved coverage network which will also introduce 5G technology to allow for faster download speeds and better signal.

The consequences of the global pandemic have also highlighted the inadequate nature of infrastructure in suburban and rural areas in particular as a result of increased home-working and e-learning for school. Existing base stations have struggled to handle increased data traffic demands which demonstrates the importance of improving digital connectivity in all parts of the country. In addition to improving signal strength, speed and capacity for current demands the proposed works will also aid in futureproofing the quality of the network through its greater robustness. As a licensed code operator, the applicant has a legal obligation to ensure a high-quality service is accessible to the public throughout the UK as it contributes positively towards the socioeconomic development at local and national levels. This is particularly apparent in densely populated areas that experience high levels of footfall on a daily basis.

The demand and focus on delivering the 5th generation of mobile phone technology is the primary objective of licensed operators in the UK as part of the national rollout. In today's climate the existing 4G network has allowed users to video stream at much faster data speeds allowing the integration of smart phones into wider uses than previous generations. The inevitable consequence of technological advancements means that customers expect tasks to become even quicker and simpler.

To quote the 5G and Future Technology document, *"It is estimated that 5G will directly contribute to an additional £7 Billion a year to the UK economy in just six years from roll-out. Although 5G will undoubtedly bring new opportunities and huge benefits to society, we cannot escape from the requirement that new structures, antennas and ancillary equipment will be needed. But to do so the network needs to be surveyed, designed and planning approval obtained. It has been acknowledged by Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks."*

The introduction of 5G technology will improve the country's digital connectivity and appeal to visitors and businesses alike through the creation of smarter technology which will benefit the British economy.

"Examples of this new world that will emerge from ubiquitous 5G coverage involves such things as connected and autonomous vehicles, traffic management, smart manufacturing with heterogenous autonomous machines, direct machine to machine communication, advanced medical devices, automated agriculture, far greater security provision, more stable and reliable connectivity and advances in further application development with uses not yet identified. All of the above provides an insight into the future development of connectivity in our modern world and also provides a further insight into the expected minimum eight-fold increase in data usage by each mobile operator over the next 5-6 years."

The national government recognises the importance of the 5G rollout which is a stance taken by government minister Margot James, the NPPF and The National Infrastructure Commission.

"5G has the potential to dramatically transform the way we go about our daily lives, and we want the citizens of the UK to be amongst the first to experience all the opportunities and benefits this new technology will bring...." – Margot James, the government minister for digital).

"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections." – NPPF (July 2018)

"Getting 5G deployment right will be critical in a future where connectivity is becoming integral to almost all parts of the economy, and the UK will put its future growth and competitiveness at risk if it falls behind." – 'Connected Future' National Infrastructure Commission 2016

Although Central Government understands that this may present concerns with the various design solutions proposed, it is important that all Local Planning Authorities understand the technical needs of 5G and better understands the wider advantages of such new technology. The government have also expressed support for new telecoms installations and the deployment of new technology. It is seen as essential for the country to develop and exploit the advantages of such new technology to the direct benefit of the public and the economy.

3.3 Coverage

The licence granted to VMO2 demands that strict coverage qualities are met nationwide. It is essential that the benefits of mobile phones are available across the population. Mobile networks are constantly reviewed to ensure that there is adequate coverage and capacity to meet customer demands. In the current environment there is an expectation for signal coverage to be available at home, in the workplace, while shopping, enjoying leisure activities or in transit. This proposal will provide bespoke coverage to a host building but it will result relieving the pressure on the existing network, which has capacity issues at times of high usage.

3.4 Quality

In order to ensure there is sufficient coverage within buildings such as homes, shops, offices etc. the radio signal has to be of adequate strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, which are sometimes less than 1 km apart. The improvement of 3G and 4G signal and introduction of 5G in this area will encourage economic advancement in accordance with national policy which seeks to develop and grow connected environments.

3.5 Capacity

This proposal will improve the capacity of the surrounding network and will ensure that there is enough capacity for the venue when there is an event on.

3.6 Health and Safety

The proposal for this site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines and therefore Health and Safety concerns should not be a planning consideration. An ICNIRP certificate is submitted with this application.

In addition to this, The Institution of Engineering and Technology's Guide for Local Planning Authorities regarding 5G Masts and Small Cells, provides a brief overview of 5G technology and the health issues that are often misunderstood. It concludes by saying, *"Small 5G base stations in our towns and cities will allow improved network coverage. They will reduce radio wave exposure to individual smartphone users and improve local 5G capacity for all manner of useful bandwidth-hungry applications. And a good 5G fibre base local broadband infrastructure will be important to local communities over the coming decades in view of the ever-increasing amounts of data being consumed by the general public."*

4 Conclusion

A requirement for improved coverage for this venue has been identified as the existing network is not sufficient to provide in building coverage. The installation of the small cell antennas will provide essential services for the venue and ensure that there is good digital connectivity when the venue is at capacity. This will ensure that in an emergency the network can be utilised.

The proposed works have been designed sensitively in consideration for the character and appearance of the surrounding area and the host listed building in which the least impactful scheme has been proposed and utilises existing equipment where possible to minimise the visual impact of the proposal whilst also ensuring the coverage objectives can still be achieved. A reduction in the number of small cells would therefore substantially impact the quality of signal, coverage provided and the overall functionality of the site.

The applicant considers the proposal to be an acceptable development which should be viewed favourably by the local planning authority.