

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Jarrow Road	Site Address:	Footway of Jarrow Road, Ferry Lane, Tottenham, London N17 9PX
National Grid Reference:	E: 534659 N: 189436		
Site Ref Number:	CS_23718720	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?		No
If no explain why: No publicly accessible up to date mast register.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	18/03/2025
Name of contact:	Kwaku Bossman-Gyamera

¹ Macro or Micro

In the first instance, all correspondence should be directed to the agent.

Cornerstone Industry Site Specific Supplementary Information (England) V.9 – 22.03.2024

Registered Address:
Cornerstone Telecommunications, Infrastructure Limited,
Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.
Registered in England & Wales No. 08087551.
VAT No. GB142 8555 06

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Summary of outcome/Main issues raised:

A pre-application consultation letter, a consultation plan and a set of proposed plans were sent to the Chief Planning Officer for the Local Planning Officer via email, dated 26/02/2025.

A response was received on 18/03/2025, stating:

'The comments are outlined below accordingly.

Replacement and relocation of 17.5m pole supporting 6no. Antennas with 20m pole supporting 12no. Antennas, replacement and relocation of 6no. Equipment cabinets and development ancillary thereto.

A similar proposal was refused by the Local Planning Authority (LPA) under planning application reference HGY/2022/2401 dated 22 August 2022. Appellant subsequently appealed the council's decision which was then allowed on appeal (APP/Y5420/W/22/3310154). The proposed position of the mast and the cabinets in the middle of the public footway is unacceptable and as such you should consider relocating the mast and cabinets to the edge of the footway adjoining the green verge. (similar to the allowed scheme). Reposition of the mast and cabinets to the same location as the allowed appeal would be supported in this instance.

In allowing the appeal the inspector stated:

"The proposed installation would be taller than the closest dwellings on the Ferry Lane Estate. Whilst it would be taller than many of the trees within the adjacent open space, some nearby trees would be marginally taller. Consequently, views of the installation from properties to the east of Jarrow Road would be set against the backdrop of the mature trees, which would also provide some screening to the installation when viewed from the west and southwest. Whilst it would be more clearly visible from some angles, particularly during months when the trees are not in leaf, the relatively slim profile and neutral colour would assist in integrating the structure into the surroundings".

The inspector further stated that "A range of street furniture exists in the vicinity, including roadside lighting columns in a range of types, sizes and colours. Whilst the proposed installation would be taller than many nearby features, the established and varied presence of vertical structures in the streetscene provides an environment to which the proposed installation would not appear alien. Furthermore, the nearby presence of significantly taller buildings along Ferry Lane would mean its scale would not appear disproportionate".

Provided that the mast and the cabinets are positioned in the same location as the allowed scheme - the LPA would not object to the proposal. This would be in line with planning inspectorate decision. However, if the location remains as proposed, the LPA would be unable to support the proposal.'

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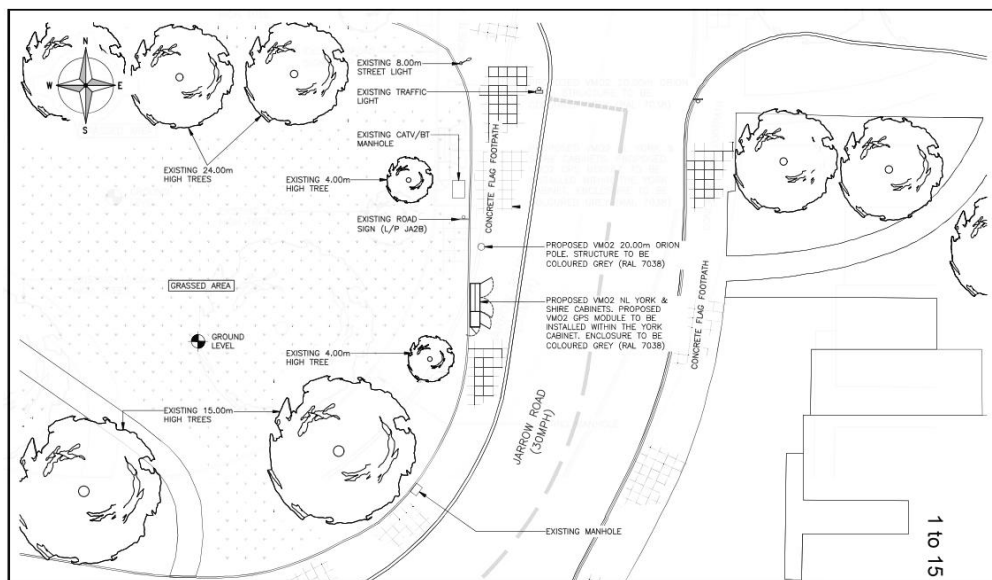
A response was issued via email on 19/03/2025, stating:

'Thank you for the below email, I have been passed this on as the Town Planning lead at Clarke Telecom Ltd

First of all, thank you for your comments and response, its very much appreciated. I just wanted to get a couple of bits clarified first

The proposal is for the installation of a 20m monopole supporting 6 no. antennas, 2 no. transmission dishes, 2 no. equipment cabinets and ancillary development thereto. This is not a replacement monopole as noted below, it is a new installation for the operator Virgin Media O2 (VMO2)

The equipment cabinets are situated at the rear of the grassed verge as per the screenshot below and re-attached for ease



The equipment cabinets and monopole cannot be located in the same location as the appeal due to highway safety issues. The monopole and equipment cabinets have been located as such to avoid blocking the street furniture and the visibility splay's of the area.

I hope this clears this up? Can confirm, given the information above, the proposal would still be acceptable in this position please?

After multiple chaser emails, a response was received from the original officer advising the **current location being submitted under this application is their preferred location**. Please see the document called "pre-application consultation letters and responses document" submitted as part of this application evidencing the case officers position.

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Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	
Summary issues raised: Cornerstone's commercial relationship with Virgin Media O2 (VMO2) UK Ltd has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means they no longer have visibility of VMO2 full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance. Cornerstone aim to engage and work with planning department at the earliest opportunity from when Cornerstone is instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss their wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans, then please advise. Cornerstone recognise the importance of developing connectivity.	

Community Consultation

Rating of Site under Traffic Light Model:	~~Red~~	Amber	~~Green~~
Outline of consultation carried out: Pre-application consultation letters and sets of proposed plans were sent to the local ward councillors for South Tottenham (Councillors Sheila Peacock, Mark Grosskopf and Makbule Gunes) via email, dated 26/02/2025. A pre-application consultation letter and a set of proposed plans were sent to the London Assembly Member for Enfield and Haringey (Ms Joanne McCartney) via email, dated 26/02/2025. A pre-application consultation letter and set of proposed plans were sent to the local MP for Tottenham (Mr David Lammy) via email, dated 26/02/2025.			

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Summary of outcome/main issues raised (include copies of relevant correspondence):

A comment was received from Ferry Lane Estate Group via email, dated 02/03/2025, stating:

'FLAG is the recognised residents association for the Ferry Lane estate, N17. We have been informed by our local Councillor that you have plans for a telecommunications installation at the front of our estate. We would like to see your proposals and learn more about what your plans are. Can you contact us please?'

A response was issued by an agent, on behalf of the applicant, via email, dated 19/03/2025, stating:

'First of all, please accept my apologies for the delay in response to yourself. However, please see attached the proposed drawings which identify the location of the monopole and equipment cabinets

Any questions, please let me know and I will answer promptly'

A further response was received from the chair of Ferry Lane Estate Group via email, dated 19/03/2025, questioning:

- 1) whether planning permission was required again given the change of location?
- 2) concerns over where vehicles will park during the construction of the mast?

A response was issued by an agent, on behalf of the applicant, via email, dated 19/03/2025, informing the Group:

1. The previous application was submitted for a different applicant and operator, instead this application is for and on behalf of Cornerstone to host VMO2 equipment.
2. Both approvals will not be built after confirmation from CK Hutchinson their pole is not required.
3. Appropriate traffic management measures will be put in place in the event the application is approved

A copy of the full correspondence can be found under "pre-application consultation letters and responses document" submitted as part of this application.

School/College

Location of site in relation to school/college (include name of school/college):

Ferry Lane Primary School, Jarrow Road, Tottenham, London N17 9PP

Outline of consultation carried out with school/college (include evidence of consultation):

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A pre-application consultation letter and a set of proposed plans were sent to the Headteacher and Chair of Governors of Ferry Lane Primary School via email, dated 26/02/2025.
Summary of outcome/main issues raised (include copies of main correspondence):
No comments were received.

Civil Aviation Authority/Secretary of State for Defence or the operator of the civil safeguarding area or defence safeguarding area notification (only required for an application for prior approval)

Will the proposed development be on a civil safeguarding area or a defence safeguarding area?		No
Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area or defence safeguarding area been notified?		No
Details of response:		
N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	A developer's notice and a set of plans were sent to the Haringey Council Highway's Department via email on 15/07/2026. Copies of the developer's notice and proof of delivery are attached as part of this application.	

3. Proposed Development

The proposed site:
Background: Cornerstone is the UK's leading mobile infrastructure services company. They acquire, manage and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. They oversee works on behalf of telecommunications providers and wherever possible aim to: • promote shared infrastructure • maximise opportunities to consolidate the number of base stations • significantly reduce the environmental impact of network development As part of Cornerstone's network improvement programme, VMO2 is in the process of progressing a number of suitable sites for radio base stations, which will provide improved 2G and 4G coverage and new 5G service provision. This is fully in line with the Government's aim to ensure that everyone is connected to the superhighway.

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Cornerstone and VMO2 are in the process of progressing a new suitable site in this area for a radio base station to improve existing levels of service provision. The site needs to provide new coverage and capacity to ensure that customers continue to experience access to the latest service provision of 4G coverage and capacity. The proposed new mast installation will also meet the extra demands on the network in this area as new technologies improve.

Capacity refers to the maximum amount of data a network can handle and the number of devices it can support simultaneously. When too many devices try to connect to the network, it can become overloaded, leading to issues like slow internet speeds and dropped calls. This is similar to a highway getting congested when there are too many cars. Even if there is coverage in the area, the network will not operate properly if there are issues with capacity. This means that while your device may show a strong signal, the network can still struggle to deliver fast and reliable service if it is unable to manage the high demand. A new installation in this location will allow to provide improved coverage to this area, as well as to improve capacity on the operator's network.

As part of VMO2 continues network improvement program, there is a specific requirement for a new installation at this location to provide improved 4G coverage, and new 5G coverage ensuring that this area of Tottenham Hale has access to the latest technologies.

Proposed Development

The proposal comprises the installation of a 20m high monopole supporting 6 no. antennas, 2 no. transmission dishes, 2 no. equipment cabinets and ancillary development thereto including Remote Radio Units (RRUs) and GPS module.

The proposed site is located on a footway of Jarrow Road to the southeast of Tottenham Hale Tube Station, and south of the road junction of Jarrow Road and Ferry Lane. The wider area is of a mixed-use nature with a combination of residential, commercial and industrial properties.

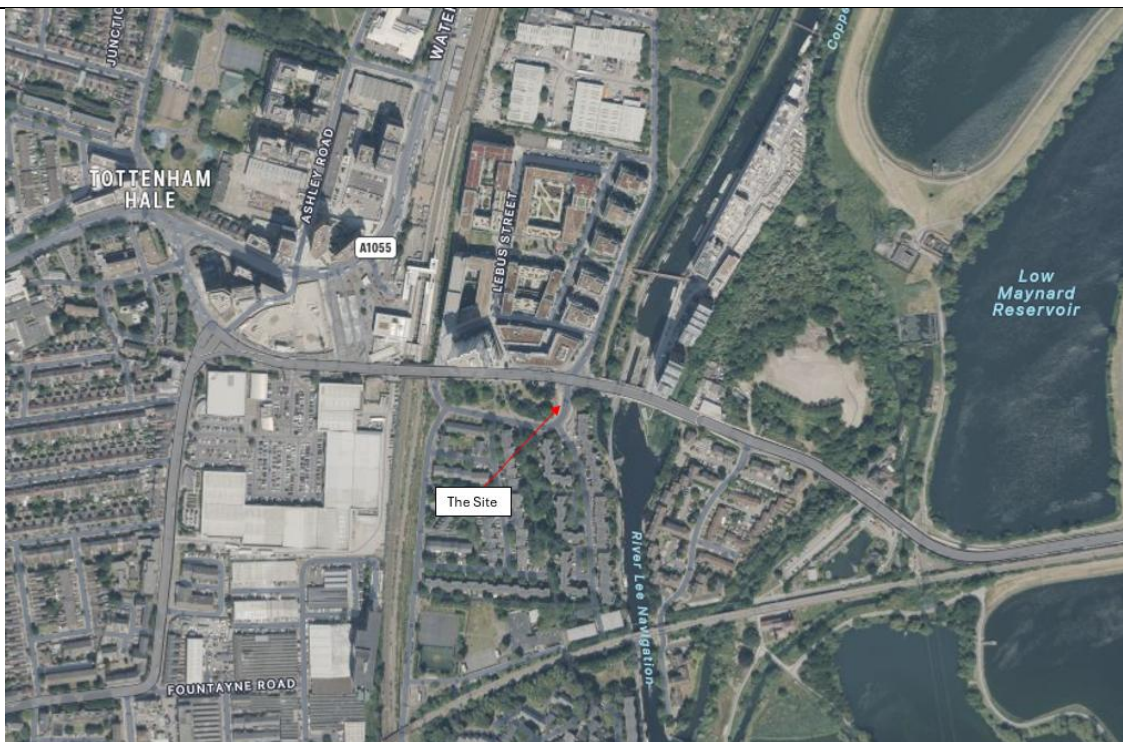
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Map 1. Site Location Map

The proposed radio base station is located on the footway of Jarrow Road, south of the junction of Ferry Lane and Jarrow Road.

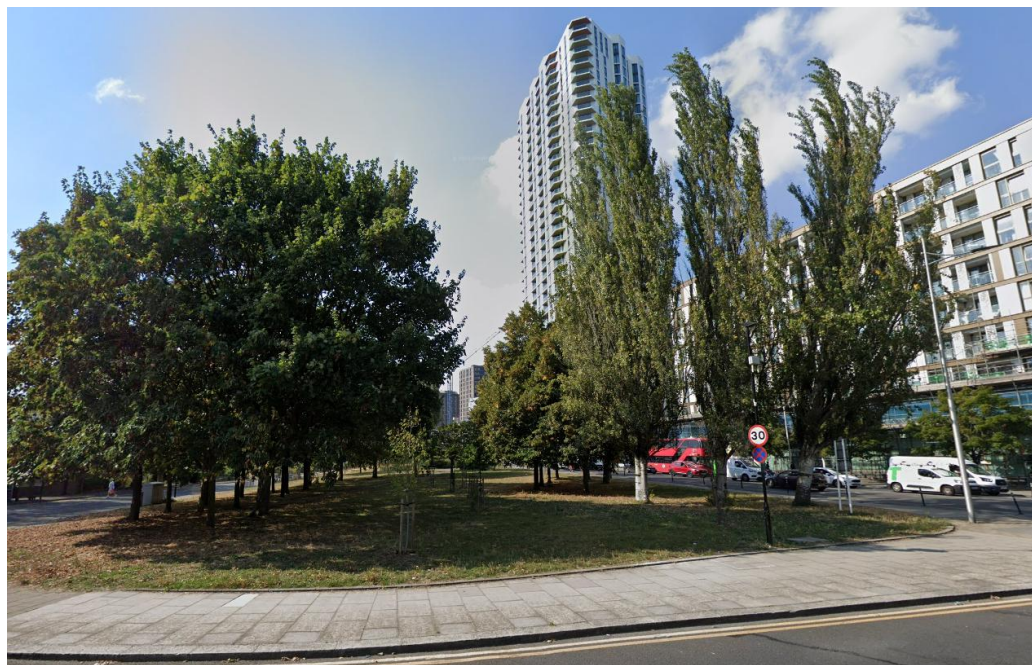


Photo 1: View of the site looking northwest (Source: Google Maps).

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To the west of the proposed site is a grassed area with semi-mature and mature trees, some reaching up to 24m in height. These trees will provide partial screening and a natural backdrop when viewed from various directions, helping to minimise the visual impact on local amenity.

To the south, Jarrow Road continues towards its junction with Reedham Close. Approximately 38m away in this direction are residential properties. However, due to their orientation being at a 90-degree angle to the proposal, they will not directly overlook the mast. Furthermore, the presence of semi-mature and mature trees in this area will further reduce the site's visual impact from this direction.



Photo 2: View of the site looking south.

To the southeast, on the opposite side of Jarrow Road and approximately 22m away, are residential properties. The mast's location has been carefully selected to ensure it is not directly in front of these properties. When viewed from these residences, the mast will be seen at an acute angle, against a backdrop of semi-mature and mature trees, and in the wider context of a high-rise residential tower further in this direction. As a result, the visual impact on local amenity will be minimised as far as practicable.

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Photo 3: View east of the proposed site.

To the north, Jarrow Road continues towards a four-way junction with Ferry Lane, beyond which are residential blocks of flats. From various vantage points, the proposed radio base station will be viewed in the context of semi-mature and mature trees, which range in height from 14m to 24m. Their height will provide partial screening and a backdrop, further reducing the visual impact on the surrounding area.



Photo 4: View of the site looking north.

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There are a number of other linear street furniture items in the surrounding vicinity such as lighting columns, traffic lights, bollards, road signage, as well as semi-mature and mature trees in a wider area which will help to assimilate the proposed radio base station to the surrounding area.

3G (and eventually 2G) has been switched off by all of the operators in order to repurpose these radio frequencies for faster more energy-efficient 4G and 5G services. 3G is primarily used for mobile data services. It has been switched off first because it has already largely been superseded by 4G. Hence the importance of providing the latest 4G and new 5G service provision in areas where there is no such coverage. As a result, it is imperative that the operator builds resilience into the network.

The proposed radio base station is located on the footway of Jarrow Road located in a busy part of Tottenham Hale. To the west of the proposed site is located Tottenham Hale Retail Park, and to the northwest is Tottenham Hale Tube Station. Due to the significant number of daily commuters, as well as the residents and businesses in the area, there is a high demand for high-quality 4G and 5G coverage and capacity. The proposed site will provide new 4G and 5G coverage and capacity, to meet this demand.

Furthermore, the proposed site is located within the Tottenham Hale Growth Area, in close proximity to areas recognised in the Council's Planning Policy Maps as a Locally Significant Industrial Site (265m away) and a Local Employment Regeneration Area (95m away). This further strengthens the need for improved digital connectivity, which will benefit the local economy, make the Tottenham Hale area more attractive to businesses, and help meet the Council's ambitions set out in the Local Development Plan.

Additionally, several new developments are ongoing in the surrounding area, which will result in an increased number of residents, putting higher pressure on the operator's network. As such, the new radio base station is crucial to improving connectivity and meeting the growing demand for mobile services. Approximately 300m northwest of the proposed location, the Heart of Hale development is underway, which will provide seven new buildings, introduce new businesses, and deliver over 1,000 new homes. Therefore, it is imperative that the operator's network is strong enough to meet both current and future demand.

Without the new installation in the area, there will be a gap in the existing coverage due to which the operator's network will struggle to meet the customer's demand in this cell area, as a result the operator's customers will not be able to use their handheld devices as intended. Lack of improved capacity in the area will result in buffering and dropped calls, leaving customers with unreliable service in this area.

Planning History

HGY/2022/2401 – Proposed 5G 20m telecoms installation – H3G street pole and additional equipment cabinets.

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A previous prior approval application for a similar design and the same height, submitted by the H3G operator (known as Three), was considered by the Council in August 2022 under LPA ref: HGY/2022/2401. The application sought approval for the appearance and siting of the development and to determine whether prior approval was required. The proposal was refused in October 2022 due to concerns regarding its siting, size, scale, and prominent location, which would result in a visually intrusive, incongruous, and obtrusive form of development.

Later, the applicant appealed the planning refusal, and the appeal was allowed in June 2023. The Planning Inspector stated that while the mast would be taller than the closest dwellings on the Ferry Lane Estate, the nearby trees would provide a backdrop, thereby minimising the visual impact. The Inspector also noted that although the mast would be taller than other street furniture in the vicinity, it would still blend in visually, preventing it from looking out of place. The appeal was subsequently allowed.

The current application is in a very similar position, proposing a similar design and the same height. Therefore, the findings in the appeal for another operator's mast (LPA ref: HGY/2022/240) are transferable here, and as such, the current proposal should be considered acceptable. The acceptance of the location has already been confirmed by the local planning authority at pre-application stage, detailed above.

While the applicant acknowledges the possible concerns regarding two different radio base stations being located next to each other, it will not be possible for both to be constructed. Firstly, it is confirmed the project associated with the mast allowed via appeal has now come to an end, and it is not expected that the proposal will be built. However, even if that were not the case, there is a minimum distance requirement between radio base stations to ensure their effective operation. Therefore, even in the scenario where both applications are approved and both operators wish to proceed with construction, realistically, only one would be able to do so. As a result, the proximity of the current proposal to the other operator's approved mast should not be a concern that would lead to the refusal of the current application.

After further investigation, the applicant would also point out the appeal site location is unviable. The pole and cabinets positioning would restrict views of the traffic lights for road users and since the appeal was allowed, a CCTV camera has been installed at the top of the traffic lights. Installing a pole in this location would block the views of both the traffic lights and the visibility for the CCTV camera. As a result, detailed above, the preferred location being submitted under this application, is seen as the best and only location.

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

The installation of this ground-based installation will enable enhanced 4G and 5G coverage and capacity to the surrounding area for VMO2 to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

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The proposed location and height will allow for the optimum level of coverage and capacity to be provided to the target coverage area. The levels of high-quality, reliable 4G and 5G coverage that will be provided to this area is significant. As more people require mobile access for phone calls and mobile internet at once. Increasing the capacity of the network will ensure more people are able to use their phones at the same time whilst reducing the risk of calls dropping, internet buffering etc.

Capacity refers to the maximum amount of data a network can handle and the number of devices it can support simultaneously. When too many devices try to connect to the network, it can become overloaded, leading to issues like slow internet speeds and dropped calls. This is similar to a highway getting congested when there are too many cars.

Type of Structure (e.g. tower, mast, etc): Orion Pole	
Description:	
Installation of a 20m monopole supporting 6 no. antennas, 2 no. 0.3m transmission dishes along with 2 no. equipment cabinets and ancillary development thereto including 3 no. Remote Radio Units (RRU's).	
Overall Height:	20m
Height of existing building (where applicable):	N/A
Equipment Housing: York Cabinet	
Length:	0.600 metres
Width:	1.900 metres
Height:	1.750 metres
Equipment Housing: Shire Cabinet	
Length:	0.6 metres
Width:	1.05 metres
Height:	1.75 metres
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel – Grey – RAL 7038
Equipment housing – type of material and external colour:	Steel – Grey – RAL 7038

Reasons for choice of design, making reference to pre-application responses:
In terms of setting, given that the subject site is located on the public highway, a street furniture style development has been deemed to be most suitable type of base station as this is the most accepted design for urban, suburban and rural roadside locations throughout the UK. The applicant has carefully considered the design of the new proposed column. The applicant is proposing the most sensitive design currently available to provide the necessary coverage and capacity to the surrounding area. Due to all the technologies that will be

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available at this location 4G and 5G, 6 antennas need to be installed at the top of the slim-line monopole. These are split into a dual stack formation where 3 antennas will be located at the top and the other 3 will be located underneath. Thus, if the column were to be any lower, the antennas would not be able to clear the buildings and urban clutter and as such would not be able to operate effectively.

As radio base stations must provide coverage on the operator's network, their siting options are limited by technical constraints. Therefore, even if there are sites within the search area that could potentially have a smaller visual impact on public amenity, they might not be suitable from an operational perspective. This was recognised by the Inspector in a recent appeal (Ref: APP/C5690/W/23/3334595). In paragraph 13, the Inspector stated: "...Whilst there may be sites which are better sited in respect of character and appearance as well as amenity considerations, there is little point in assessing those sites if they do not meet operational requirements to support high quality communications...".

The proposed height at 20m is essential in order to provide coverage to the target coverage area. 5G new radio technologies operate in higher frequency bands than older technologies. Since it operates at higher frequencies where attenuation of the radio signal is naturally higher, and the effects of clutter are greater it will normally require a higher structure to achieve the same coverage footprint. To increase capacity and data speeds to the user, the antenna will normally need to be mounted higher than conventional antennae. These factors drive a requirement for an increase in antenna height in 5G.

The new antennas are all unshrouded for technical reasons. However, they have been designed to be as tight as possible and virtually the same width as the main column, to minimise their visual appearance. The higher the radio frequency the more signal attenuation there is. The higher frequency 5G antennas are unable to operate effectively through the Glass Reinforced Plastic that the shroud is made up of and as such if these antennas were to be shielded then they would not be able to provide the necessary coverage to the target coverage area. An additional installation would be needed elsewhere within the cell area, leading to the proliferation of masts.

This is the slimmest design possible which will enable all the multi technologies to be supported from this site. If the column and antennas width were to be any slimmer than the technology would not fit in the one column and another radio base station would be required, which would lead to the proliferation of masts contrary to national Government guidance set out in the NPPF and The Code of Practice. Similarly, if the column were to be a uniform width throughout then the overall width would have to increase which would appear more visually prominent in the street scene, than the proposed design.

The proposed design is more visually sensitive and much easier to assimilate into a street scene than lattice towers or more traditional monopoles with bulky headframes. These non-stealth designs are preferred by operators as they are structurally capable of hosting more equipment and give greater scope for antenna orientation and are thus more efficient structures. However, such designs would appear alien in this location. Therefore, the operator

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has compromised on obtaining maximum coverage in order to better assimilate into the street scene.

The design of the column resembles as closely as possible the lighting columns, traffic lights and road signage, as well as semi-mature and mature trees. These vertical structures will continue to help the proposed installation to assimilate with the surrounding area. It is accepted that the height of the proposed installation is taller than other pieces of surrounding street furniture, and some buildings, but this in itself is not a valid reason to conclude that it is not appropriate at a specific location. Telecommunications apparatus by its very nature must be taller than surrounding built and natural form to ensure its efficient operation.

It was noted by the inspector in appeal decisions for CK Hutchinson (APP/Y5420/W/22/3310154) there is a variety of street furniture at differing heights which allows the monopole to blend in with the area here:

*Para 8 "A range of street furniture exists in the vicinity, including roadside lighting columns in a range of types, sizes and colours. Whilst the proposed installation would be taller than many nearby features, the established and varied presence of vertical structures in the streetscene provides an environment to which **the proposed installation would not appear alien**. Furthermore, the **nearby presence of significantly taller buildings along Ferry Lane would mean its scale would not appear disproportionate**"*

The design of the column maintains its simple, functional, vertical structure which will not appear incongruous within the street scene. The presence of other linear urban structures such as lighting columns, traffic lights, road signage and bollards, will assist with assimilation in the street scene. The column is proposed to be coloured grey to match the surrounding elements of street furniture, as well as to blend with the often-grey British sky. Although the column can be coloured any other colour the LPA consider appropriate.

The equipment cabinets designed to appear like the existing cabinets already in situ. They are small for telecommunications apparatus and proposed to be coloured grey to match the other cabinets already in situ. The equipment cabinets can be installed under the operators permitted development rights once the monopole is built but have been included on the plans and in the description in order to remain fully transparent.

The RRUs are small each one about the size of a shoe box. They are designed to make the antennas more efficient and reduce the amount of ground-based equipment cabinets thus minimising the visual impact on the surrounding area. Given their height some 16m above ground level underneath the antennas they will not be overly prominent in the street scene.

The transmission dishes are essential to link the installation back to the MNO's wider network and relay the data. The dish antennas used by mobile phone networks are relatively small. They are used to link individual radio base stations to each other, through a series of links, into the wider mobile phone and fixed line networks. In order to communicate with each other, dish antennas must have a clear line of sight, sometimes known as point-to-point

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communications. They must be in clear view of each other without any physical obstructions such as trees or buildings which would reduce or disrupt the low-powered signal. For this reason, dish antennas are always mounted high on rooftops or tall structures. In this instance, in order to obtain a clear line of sight their centre line height needs to be 15m above ground level.

It is therefore considered that the proposal before you strike a good balance between environmental impact and operational considerations. The proposed height and design represent the best compromise between the visual impact of the proposal on the surrounding area and meeting the operator's technical requirements for the site. Taking all matters into account it is considered that this proposal, to provide the latest enhanced 4G and 5G service provision providing high quality dense coverage and capacity, would not appear out of place within the street scene, as confirmed by the inspector for a similar installation circa 6m away from this site.

Health and Safety - including ICNIRP compliance

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below).

International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.

When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.

In order to minimise interference within its own network and with other radio networks, Telefonica operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.

As part of Telefonica's 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.

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The telecommunication infrastructure the subject of this application accords with all relevant legislations 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

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

A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

There is a specific requirement to install a radio base station at this location to enable and enhance 4G coverage and capacity to this area of Tottenham Hale and to provide new 5G service provision.

Currently, there is a large 'hole' in service provision, which means that the majority of the operator's customers cannot use their handheld devices for the purposes in which they were purchased. This installation will fill this partial gap for VMO2.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures and downloads. Without base stations, mobiles and devices will not work. Base stations are made up of three main elements. The cabin which contains the equipment used to generate the radio signal. A supporting structure such as a mast which holds the antennas in the air and the antennas themselves.

Base stations are connected to each other and telephone exchanges by cables or wireless technology, such as microwave dishes, to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. The size and shape of each cell is determined by the features of the surrounding area, such as buildings, trees and hills, which can block signals. When people travel between cells, the signal is transferred between base stations without a break in service. However, each base station can cover a certain area only and can only handle a limited number of calls at once. As mobile phones and devices become more popular more base stations are needed to ensure continuous coverage.

Individual base stations can only handle a certain number of calls or data downloads. If the number of calls or data requests exceeds the base stations capability, then local network users will experience a reduction in data download speeds and reduced call quality. We call

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areas without good coverage 'blackspots' and all mobile phone networks suffer from them. You can experience them wherever you are, even in cities with lots of base stations.

To keep up with growing demand the operators need to upgrade existing base stations or build new base stations to improve the capacity. Capacity is the maximum data or calls that can be processed by a base station.

5. Site Selection Process

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

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

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

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

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
D1 – Rooftop	Rooftop of Coppermill Heights, Mill Mead Road, Tottenham Hale, London Borough of Haringey, London, Greater London N17 9FH	E: 534664 N: 189489	There is a fire risk due to the external cladding on this building, meaning an installation would not be suitable due to health and safety issues. This site has therefore been discounted for this reason.
D2 – Streetworks	Footway of Ferry Lane, Tottenham Hale,	E: 534837 N: 189403	It is not possible to install a radio base station at this location due to

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	London Borough of Haringey, London, Greater London N17 9BP		unresolvable underground services. Furthermore, an installation at this location would be directly in front of residential properties, with no screening or backdrop available, and would therefore result in a greater visual impact than the nominal site. This site has therefore been discounted for these reasons.
D3 – Rooftop	Rooftop of properties at the junction of Jarrow Road and Reedham Close, Tottenham Hale, London Borough of Haringey, London, Greater London N17 9FH	E: 534688 N: 189411	The rooftops of these properties are too low to deliver the required level of coverage to the target area. In order for the antennas to reach the target area, they would need to be elevated on a stub tower, which would have a greater visual impact on the surrounding area than the nominal site. Therefore, this site has been discounted for this reason.
D4 – Rooftop	Rooftop of residential property at Ferry Lane, Tottenham Hale, London Borough of Haringey, London, Greater London N17 9BP	E: 534806 N: 189402	The rooftops of these properties are too low to deliver the required level of coverage to the target area. Additionally, due to the pitched construction of the roof, there is no suitable design available to support the operator's apparatus and provide the necessary coverage. The pitched design means the equipment would slide off the battens and tiles. The roof is also unlikely to be structurally stable enough to support the equipment due to the significant weight of the antennas. Therefore, this site has been discounted for these reasons.
D5 – Streetworks	Footway of Bream Close, Heron Wharf, London Borough of Haringey, London, Greater London N17 9DW	E: 534837 N: 189345	The footway at this location is too narrow to accommodate the operator's equipment. Placing a radio base station here would raise highway health and safety concerns. Furthermore, the levels of screening and backdrop at this location are lower than at the nominal site, which would result in a greater visual impact. Therefore, this site has been discounted for these reasons.

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D6 – Streetworks	Footway of Erskine Crescent, Ferry Lane Estate, London Borough of Haringey, London, Greater London N17 9PR	E: 534588 N: 189366	The footway at this location is too narrow to accommodate the operator's equipment. Placing a radio base station here would raise highway health and safety concerns. Furthermore, an installation at this location would be closer to residential properties than the nominal site, resulting in a greater visual impact on the surrounding area. Therefore, this site has been discounted for these reasons.
D7 – Rooftop	Rooftop of Hale Works Apartments, Ferry Lane, Hale Village, London Borough of Haringey, London, Greater London N17 9FG	E: 534564 N: 189474	The building is too tall to deliver the required coverage and capacity to the target area. Installing a radio base station at this location would cause the signal to overshoot the target area and interfere with neighbouring cells. Therefore, this site has been discounted for these reasons.
D8 – Rooftop	Rooftop of Navigation Point, Hale Wharf, Tottenham Hale, London Borough of Haringey, London, Greater London N17 9BZ	E: 534780 N: 189460	The building is too tall to deliver the required coverage and capacity to the target area. Installing a radio base station at this location would cause the signal to overshoot the target area and interfere with neighbouring cells. Additionally, due to the pitched construction of the roof, there is no suitable design available to support the operator's apparatus and provide the necessary coverage. The pitched design means the equipment would slide off the battens and tiles. Therefore, this site has been discounted for these reasons.
D9 – Rooftop	Rooftop of Windlass Apartments, Hale Wharf, Tottenham Hale, London Borough of Haringey, London, Greater London N17 9QH	E: 534809 N: 189521	The building is too tall to deliver the required coverage and capacity to the target area. Installing a radio base station at this location would cause the signal to overshoot the target area and interfere with neighbouring cells. Additionally, due to the pitched construction of the roof, there is no suitable design

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			available to support the operator's apparatus and provide the necessary coverage. The pitched design means the equipment would slide off the battens and tiles. Therefore, this site has been discounted for these reasons.
D10 – Streetworks	Footpath of Ferry Lane, Tottenham Hale, London Borough of Haringey, London, Greater London N17 9BP	E: 534735 N: 189443	An installation at this location would place the radio base station on a bridge over the River Lee. A ground-based radio base station cannot be installed on a bridge due to operational and structural constraints. Bridges are not typically designed to accommodate additional infrastructure, and installing a base station at this location could impact the stability of the bridge. Furthermore, the bridge's design may not provide the structural integrity required to securely support the installation or ensure safe maintenance, raising operational and safety concerns. Therefore, this site has been discounted for these reasons.
D11 – Streetworks	Footpath of Reedham Close, Ferry Lane Estate, London Borough of Haringey, London, Greater London N17 9PY	E: 534687 N: 189365	The footway at this location is too narrow to accommodate the operator's equipment. Placing a radio base station here would raise highway health and safety concerns. Furthermore, an installation at this location would be closer to residential properties than the nominal site, resulting in a greater visual impact on the surrounding area. Therefore, this site has been discounted for these reasons.
D12 – Rooftop	Rooftop of Hale Service Centre, Ferry Lane, Tottenham Hale, London Borough of Haringey, London, Greater London N17 9BP	E: 534828 N: 189456	The rooftop is too low to deliver the required level of coverage to the target area. Additionally, due to the pitched construction of the roof, there is no suitable design available to support the operator's apparatus and provide the necessary coverage. The pitched design means the equipment

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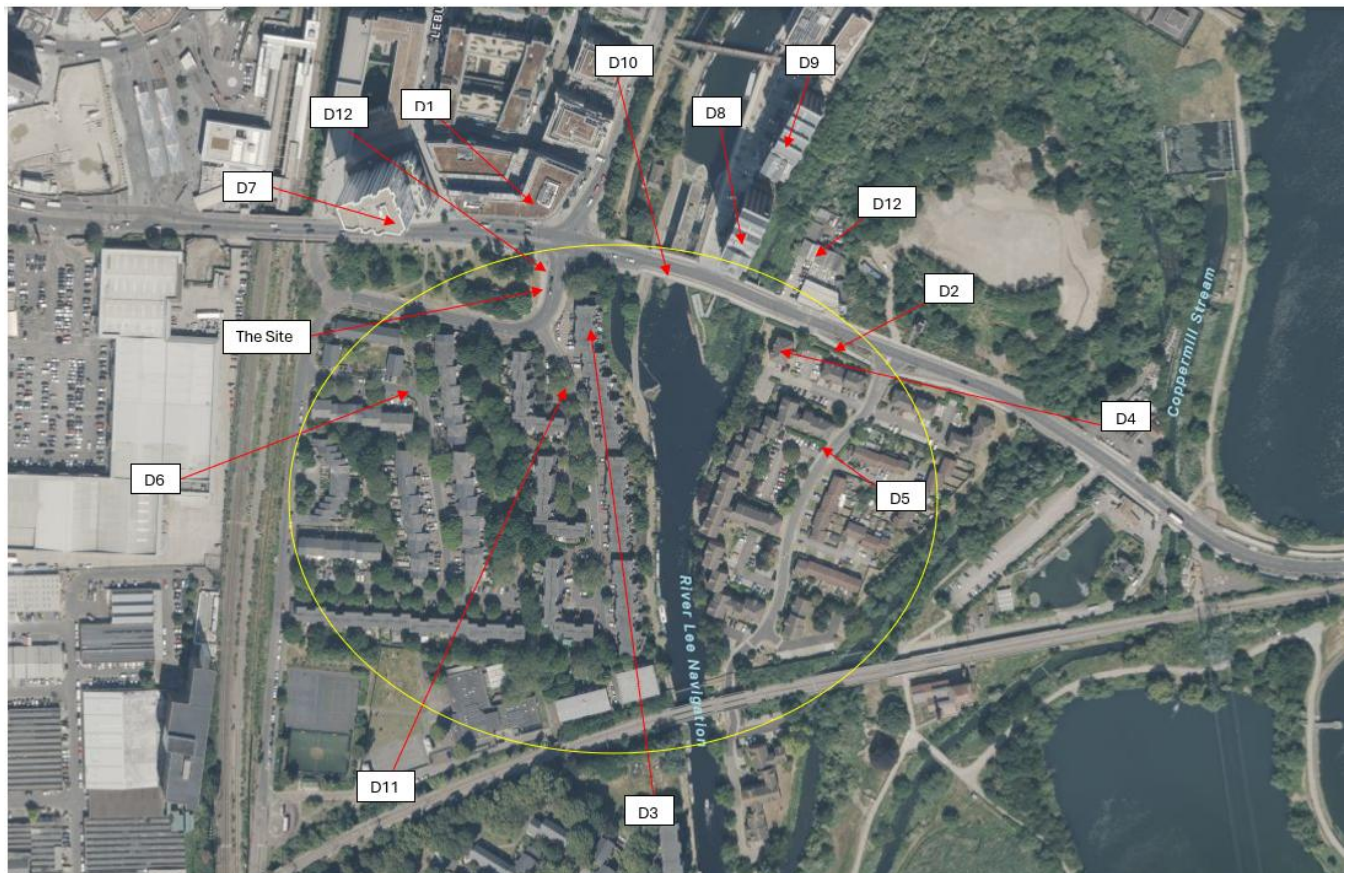
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			would slide off the battens and tiles. The roof is also unlikely to be structurally stable enough to support the equipment due to the significant weight of the antennas. Therefore, this site has been discounted for these reasons.
D12 - Streetworks	Appeal location for 3UK, Footway of Jarrow Road, Tottenham Hale, London Borough of Haringey, N17 9FH	E: 534662 N: 189441	Whilst this site location has been allowed at appeal, it is considered to not be suitable for a radio base station. The pole and cabinets positioning would restrict views of the traffic lights for road users and since the appeal was allowed, a CCTV camera has been installed at the top of the traffic lights. Installing a pole in this location would block the views of both the traffic lights and the visibility for the CCTV camera. Therefore, it is considered a site here is not safe from a highways perspective.



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Map 1: Search Area and Discounted Options.

Whilst alternative sites have been investigated as part of the site selection process, it is of note that an application for exactly the same height and similar design pole has been allowed at appeal on this road. The appeal site was located circa 6m away from this application site and will be viewed in a similar setting. The planning authority have already confirmed the location being submitted under this application is their preferred location to host a radio base station.

If no alternative site options have been investigated, please explain why: N/A
Land use planning designations: Tottenham Hale Growth Area
Additional relevant information (include planning policy and material considerations): National Planning Guidance Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. It is not necessary to quote extensively from this document, but the following points are highlighted. National Planning Policy Framework (December 2024) The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The NPPF was updated in July 2021, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. The NPPF has been recently revised again in September 2023 with an update on policy on planning for onshore wind development in England and does not affect any parts relating to telecommunications. The NPPF was revised again in December 2024; however, this did not affect any parts relating to telecommunications, with the only changes being to the paragraph numbering. The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high-quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 119 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version

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of NPPF. However, it also includes the importance of *reliable* communications infrastructure for both economic growth *and social well-being*.

The NPPF continues to support the expansion of electronic communications networks at paragraph 119. It notes that policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF makes reference to 5G:

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

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

Paragraph 120 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 123 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

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

The NPPF continues to provide guidance on decision-making. At paragraph 39 it states that:

'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including...permission in principle, and work proactively with applicants to secure

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developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 85 states:

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

Footnote 43 of the NPPF states:

'...The UK's Modern Industrial Strategy identifies priority sectors for growth and support as: advanced manufacturing; clean energy industries; defence industries; digital and technology businesses; financial services; life sciences; and professional and business services.'

Code of Practice for Mobile Network Development in England (March 2022)

The CoP strengthens national support for delivering high-quality mobile connectivity. It confirms that reliable digital infrastructure is essential for economic growth, social inclusion and access to public services, and that the planning system must actively facilitate new mobile sites and upgrades.

The CoP aligns with the NPPF, requiring planning decisions to support the expansion of electronic communications networks, including 5G. Local Planning Authorities are expected to work positively with operators, engage early, make timely decisions, and ensure Local Plans enable digital infrastructure.

The Code emphasises good siting and design, but also recognises the technical constraints of mobile networks coverage, capacity and backhaul which often require elevated antennas and, for 5G, a denser network of base stations. It notes that some previous camouflage solutions may not be suitable for modern equipment.

A balanced approach is sought between the technical needs and constraints of the proposed site and the potential impact of the development (para 26 of the Code of Practice). There are three technical and operational considerations for the installation of sites:

- Coverage – wireless infrastructure needs to provide an appropriate level of coverage over the intended geographical area. This involves ensuring that antennas are elevated sufficiently (often via masts) to provide clear lines of sight for signals.

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- Capacity – where existing network infrastructure can no longer meet demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand.
- Backhaul – the radio access network requires a connection to the core network. Backhaul is sometimes provided by a microwave link, which requires a clear line of sight between the two ends of the link.

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

The Code of Practice notes there are factors which 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

Overall, the Code makes clear that digital infrastructure is critical national infrastructure and must be delivered efficiently, collaboratively and in a way that balances connectivity needs with environmental considerations.

Local Policy

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

The statutory development plan as defined by the Planning and Compulsory Purchase Act 2004 comprises the extant the Haringey's Local Plan and the Haringey Development Management.

Haringey's Local Plan – Strategic Policies 2013 – 2026 (Adopted March 2013)

The Local Plan Strategic Policies sets out vision and key policies for the future development of the borough up to 2026. It takes forward the priorities of Haringey's sustainable Community Strategy and other plans and strategies to identify a vision for Haringey as a place to live, work and visit, and contains key policies and an implementation framework to deliver the vision.

Haringey is strategically located in the London-Stansted-Cambridge-Peterborough growth area. With strong links to the City, West End and Stansted Airport the borough is very well

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placed for both business and commuting. By 2016 it is estimated that approximately 350,000 new London jobs will have been created within one hour commuting time of Haringey.

The Vision set within the Local Plan for the Borough states that Haringey will be:

"A place for diverse communities that people are proud to belong to".

The documents also identifies 6 strategic outcomes, that will be achieved by delivering the Plan's vision, these are as follows:

- People at the Heart of Change.
- An Environmentally Sustainable Future.
- Economic Vitality and Prosperity Shared by All.
- Safer for All.
- Healthier People with a Better Quality of Life.
- People and Customer Focused.

Policy SP11: Design

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

- Be of the highest standard of design that respects its local context and character and historic significance, to contribute to the creation and enhancement of Haringey's sense of place and identity.
- Ensure impacts on health, climate change, natural resources and biodiversity are minimised by adopting and improving sustainable design and construction techniques.

There are no policies within the Local Plan directly referring to the telecommunications infrastructure.

Haringey Development Management DPD (Adopted July 2017)

The Strategic Policies Local Plan sets out Haringey's spatial strategy for managing development and growth in the Borough up to 2026. The strategy provides a positive framework for ensuring that housing, employment, infrastructure and other needs are met in a way that contributes to the delivery of sustainable development, both in the Borough and Greater London.

The Development Management Development Plan Document (DPD) gives effect to Haringey's spatial strategy and the key objectives of the Strategic Policies Local Plan by supporting proposals that contribute to the delivery of sustainable development in accordance with the strategy and providing a clear framework for resisting development that would be at odds with the Local Plan.

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The Development Management DPD sets out criteria-based policies against which planning applications will be assessed, including policies which give effect to the designations shown on the adopted Policies Map. The Development Management policies will be considered alongside the full suite of Haringey's Local Plan policies, discussed in further detail below.

Policy DM54: Facilitating Telecommunications Development

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:

- Be designed in such a way as to be capable of facilitating delivery of high speed broadband technology.
- 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.
- Deliver "ultrafast" connections in Regeneration Areas.
- Be designed to meet the requirements of Policy DM3.

Policy DM3: Public Realm

Telecommunications equipment

Proposals for the installation for telecommunication equipment will be permitted where:

- It is demonstrated the equipment is limited to the minimum operational requirement, which should be included any future-proofing requirements to accommodate anticipated improvements in infrastructure.
- Opportunities for sharing facilities, such as masts, cabinet boxes and satellite dishes, and erecting antennae on existing buildings or other structures has been fully explored and taken advantage of.
- There is no significant adverse impact on the visual amenity of neighbouring occupiers.
- There is no adverse effect on the external appearance of the building, street scene, or spaces in which they are located.
- The size of any equipment visible from the street is minimised (including satellite dishes, other domestic equipment and any supporting structures).
- They are located discretely and do not detract from the special character and appearance of heritage assets or conservation area.
- They are appropriately designed, coloured and landscaped. For dishes, this may include installing a mesh or transparent structure.
- A minimum residual footway width on main pedestrian roads is preserved, in line with the Manual of Street.

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

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Tottenham Area Action Plan (Adopted July 2017)

The Area Action Plan (AAP) has been prepared in order to ensure that the scale of development and change proposed for Tottenham through 2026 and beyond is positively managed and guided by a planning framework. It also ensures that investment decisions meet the aspirations of the local community and the Council for the area as a whole, as well as specific places and locations within it.

The vision included in AAP for Tottenham states:

'Tottenham will be the next great area of London. It will build on its geographical, natural and cultural strengths and capitalise on the dynamics of neighbourhood improvement, the significant infrastructure investments being delivered in the area and the availability of large development sites. The combination of transformative actions and continuous incremental improvement will unlock Tottenham's potential as an increasingly attractive place to live, work, study and visit, a neighbourhood fully benefiting from London's growth and its position in a world city'.

The vision for Tottenham is supported by seven strategic objectives. The most relevant to this application are as follows:

- A prosperous hub for business and local employment.
- A fully connected place with even better transport links.
- A strong and healthy community.

Further Tottenham AAP provides a vision for Tottenham Hale Neighbourhood Area, stating:

'London's next great new neighbourhood, Tottenham Hale will be a destination where people can easily access the open spaces and waterways of the Lee Valley Park whilst enjoying a range of retail, leisure and business opportunities. The Hale will feel like a new town centre with an attractive network of streets and public spaces. Through transport improvements, master planning and targeted promotion, key sites will be made ready for major new investment'.

One of the neighbourhood area's objectives is for Tottenham Hale to become:

'A working centre, with a variety of economic and employment opportunities. The existing employment stock in the area will be enhanced in response to established trends (e.g. emerging creative businesses to complement an innovative warehouse living community in the South Tottenham Employment Area), or to support emerging drives, such as a potential Tech Hub centred on the Ashley Road area. The District Centre will provide a mix of retail, leisure and office jobs'.

The London Plan 2021

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

The Foreword of the Plan states:

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

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

Para 1.0.10 is within the Planning for Good Growth section of Chapter 1 and states:

'Planning for a 'smarter' city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners.'

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

'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.'

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

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

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

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

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

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

GG5 'Growing a good economy' states:

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:

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'... (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 New London Plan creates the strongest policies ever for Digital Connectivity.

Policy SI 6 states:

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

- 1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users.
- 2) meet expected demand for mobile connectivity generated by the development.
- 3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation.
- 4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.

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

London Plan Guidance (LPG) – Digital Connectivity Infrastructure (DCI) (October 2024)

In October 2024, guidance was produced by the Mayor of London for Local Planning Authorities and telecommunications operators to provide further understanding of the requirements of SI6 6. Planning authorities should use LPG as a technical and practical guide for preparing a Local Plan to support the delivery of DCI.

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The guidance refers to digital exclusion, where people cannot access the benefits of digital communication:

"Digital exclusion refers to instances where individuals cannot access the benefits of digital communication or the internet because they lack the right digital connectivity via the physical infrastructure; a suitable device; skills; and/or the means to pay for connectivity. This LPG seeks to support improvements in fixed and mobile infrastructure provision and mobile connectivity across London through the planning process. It therefore seeks to help improve digital inclusion and access to services".

Chapter 3 – Better design for DCI delivery

Mobile digital infrastructure

"Development proposals, where applicable, should seek to meet the expected demand for mobile connectivity; avoid worsening mobile connectivity; and mitigate any adverse impacts through adherence to key design guidance suggested in this section".

The guidance understands and highlights the importance of capacity, when capacity is reached (maximum amount of data a mast can handle), this affects the amount of coverage can deliver from an individual base station:

"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. Corrective action can range from adjusting the antennae of adjacent sites (thus filling these gaps) to building new sites. To meet the estimated demand from new developments, mobile operators will rely on a combination of site types and spectrum to provide coverage and capacity to meet user needs".

The guidance explains the siting requirements of ground-based masts, whether they are existing or new:

"Ground-based masts – Existing ground-based masts should be used for network deployment wherever viable. This is to reduce the need for new development and when installing equipment, to minimise the visual impact of new development on the surrounding area as far as possible.

Where new ground-based masts are required, potential environmental and visual impacts should be reduced by siting the masts next to similar vertical infrastructure such as street lighting columns, an existing group of trees, vegetation, or other natural features".

London Growth Plan (March 2025)

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The London Growth Plan has been created to shape London's reinvention over the next decade. It will shape the future of London post Brexit and COVID-19. The plan is centred around one ambition, Growth.

The plan sets out different ambitions, the most relevant to this application are detailed below.

Building housing and infrastructure

06. Extend internet and digital connectivity.

The Growth Plan recognises that digital is everywhere. It is part of everyday life and used across all sectors. The plan expects artificial intelligence to become a part of everyday life and see's digital technologies as a driver of growth across all the priority sectors.

Infrastructure is a key competent of growth, including digital infrastructure. The plan recognises there are areas that are falling behind and notes digital connectivity infrastructure can help achieve the plans goals.

Part of the 10 year plan, increases in 5G coverage and capacity is seen as an area that can be improved:

"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".

The London Infrastructure Framework (LIF) (March 2026)

The LIF is closely linked to the London Growth Plan, the LIF has been publishes to ensure the growth that was discussed within the Growth Plan can be achieved through the successful implementation of the correct infrastructure. The foreword from the Mayor himself recognises world-class digital connectivity will secure London's resilience, competitiveness and growth.

London's next wave of growth will come via *"a digital economy powered by connectivity and data"*. However, this is currently being held back due to the limits and regulations. Therefore, the LIF aims to speed up this process and get London back on track.

The LIF recognises digital infrastructure as one of the economic infrastructure categories and identified as a critical interdependency for the other economic infrastructure sectors, underpinning supporting and enabling. In particular:

- 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.

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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.

Digital connectivity & data centres

Digital priority schemes focus on strengthening London's foundational digital infrastructure by addressing broadband gaps, **Improving Mobile Connectivity** (emphasis added), **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.

This publication, combined with the London Growth Plan outlines London's ambition and importance of mobile digital connectivity infrastructure. It is clear London and Islington, being a London Borough, has a clear route to growth, through digital connectivity.

 **LIF Portfolio – Digital connectivity & data centres**

Scheme Name	Description	Bundled Projects	Location	Included on Priority List?
Broadband In-fill	In-fill of existing broadband provision to ensure universal coverage to address not-spot areas, which may lose digital connectivity due to the copper network switch-off. Not-spot may be commercially unviable and require a grant or subsidy to deliver new broadband services.	Boldyn Networks Full Fibre Build in London BT Group Full Fibre Rollout Acceleration Community Fibre Network Expansion Hyperoptic Full-Fibre Expansion Programme Mayor of London Fibre Upgrade Programme Project Gigabit (Lot 37 – London) Transport for London Connected London Fibre Backbone West London Alliance strategic investment pot	London-wide	Yes
Data Centre Expansion	There has been significant private investment in data centres, with London/West London Europe's largest cluster. A continued requirement to identify suitable sites with sufficient energy, water available, fibre and space within Greater London.		London-wide	
Digital Connectivity for Growth	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.	Dark Fibre Backbone Mobile Infrastructure (e.g. small cells and masts) Transport for London Connected London Fibre Backbone Virgin Media O2 Mobile Network Transformation VodafoneThree UK 5G Standalone Network Build West Tech Corridor	London-wide	Yes
Digital Connectivity for Rail Travel	A programme focused on enhancing digital connectivity by installing ultra-fast fibre optic cables along major rail routes and implementing satellite connectivity to eliminate mobile black spots and improve service in tunnels. The installation of 4G and 5G infrastructure at 12 major train stations will enhance both the availability and speed of internet connections for passengers using Wi-Fi.	Low Earth Orbit Satellite Project Reach	London-wide	
Digital Support for Public Services	The use of the fibre enables the public service to move to a digital platform. Ongoing project examples include the potential replacement of the council's CCTV system to move to a digital service, but could include real-time traffic cameras, environmental sensors and IoT-connected street furniture.	Borough-wide CCTV Upgrade Programme Borough-wide Full Fibre & 5G Connectivity Programme	London-wide	Yes

Figure 11: Table of delivery areas for digital connectivity (source: <https://tinyurl.com/mry9v7x7> taken from Appendix A)

UK Wireless Infrastructure Strategy (April 2023)

In April 2023, the UK Government published the 'UK Wireless Infrastructure Strategy', a plan for delivering world-class digital infrastructure which the government identifies as an essential enabler for its 5 priorities of building a better, more secure, more prosperous future for the UK, including growing the economy, and creating better-paid jobs and opportunity right across

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the country. In her foreword, the Rt Hon Michelle Donelan MP, Secretary of State for Department for Science, Innovation and Technology, provides context for the strategy:

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

As part of the Government's commitment to delivering high-quality mobile connectivity across the UK, including 95% 4G population coverage and **standalone 5G in all populated areas by 2030**. The Strategy emphasises that improved wireless infrastructure is essential for economic growth, digital inclusion, and the delivery of modern public services. It introduces new investment programmes, including 5G Innovation Regions, and a Rural 10-Point Plan, all of which depend on the deployment of new mobile infrastructure such as masts. The Strategy also outlines a supportive regulatory and spectrum environment to accelerate rollout. The proposed mast directly supports these national objectives by improving local coverage, enabling advanced wireless services, and contributing to the UK's long-term digital infrastructure goals.

Planning Assessment

The main issues arising from this prior approval notification are whether the proposed mast and antennas due to their scale and siting would be a visually obtrusive feature which would be detrimental to the character and appearance of the area. Whether any perceived harm would outweigh the significant social and economic benefits associated with the increased service provision attributed to the proposal and other valid material considerations as outlined NPPF, which fully supports the roll out of 5G and the next generation connectivity to accelerate business opportunities and growth to ensure the economy is resilient and competitive, the relevant policies from the Haringey Local Plan, the London Plan the Haringey Development Management DPD, the Tottenham Area Action Plan, London Growth Plan and London Infrastructure Framework (LIF).

The principle of development has been established by the Government when the new permitted development rights came into force in November 2016, which enabled sites such as this one to be built under the operators permitted development rights, with prior approval for siting and appearance being the only matters that the local planning authority can take into consideration.

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

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

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

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

Siting

The siting of the proposed radio base station has been carefully considered. Furthermore, there are a plethora of existing vertical elements of street furniture in the immediate vicinity, including lighting columns, traffic lights, road signage and bollards, as well as semi-mature and mature trees. Consequently, the visual impact of the proposed radio base station will be minimised within the street scene as the proposed monopole will assimilate well with the existing vertical structures already in situ in the immediate locale. The site will be located on the footway of Jarrow Road, where it will benefit from partial screening and backdrop provided by semi-mature and mature trees located immediately adjacent to the site. Furthermore, the chosen location ensures that the radio base station will not be positioned directly in front of residential properties, thereby minimising its visual impact. Additionally, there is plethora of other vertical elements of street furniture which will help the proposed radio base station to assimilate in the surrounding area. This is in full accordance with the aspirations of the Haringey Development Management DPD, the NPPF, and the Code of Practice.

The NPPF was updated in December 2023, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. Furthermore, the revised Code of Practice (March 2022) at Para 29 states that placing a mast within or adjacent to an existing group of trees, vegetation and other natural features can reduce visual impact. Care should be taken to minimise the unnecessary loss of existing trees, though antennas will need to be sufficiently elevated to clear the treeline, and the trees may need to be maintained to prevent growth above a certain level. Both the NPPF and Code of Practice recognise the importance of improved connectivity whilst utilising existing trees to

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provide a screen and backdrop for the proposed monopole. Therefore, this proposal is in accordance with the updated NPPF and revised Code of Practice.

The inspector for the approved appeal on Jarrow Road (PINS ref: APP/Y5420/W/22/3310154) noted there are trees that rise to a similar height as the monopole, in turn forming a backdrop for some angles which reduces its visual prominence:

Para 7 "...Whilst it would be taller than many of the trees within the adjacent open space, some nearby trees would be marginally taller. Consequently, views of the installation from properties to the east of Jarrow Road would be set against the backdrop of the mature trees, which would also provide some screening to the installation when viewed from the west and southwest..."

The trees to the north and south provide intermittent screening for those travelling along Jarrow Road and Ferry Lane, along with breaking any long range views from the east at the properties of Ferry Lane. Therefore, it is considered this location is equally acceptable and in accordance with Policy DM54 of the Haringey DPD.

It is of note, the height of the monopole has already been accepted here by the inspector. If the monopole were to be reduced in height, then the antennas would not be able to clear the surrounding buildings, trees and urban clutter as such would not be able to operate effectively. A lower height would lead to a poor user experience for a large part of the target coverage area. As such, this would fail the operators design brief, and an additional installation would have to be found leading to the proliferation of masts contrary to national planning guidance contained in the NPPF.

The proposed equipment cabinets do not require planning permission, as they can be installed under the operators permitted development rights once the radio base station is built. In order to remain fully transparent, they have been included on the plans and in the description. The operator's equipment cabinets are similar to those of other statutory undertakers which are commonplace in urban areas. Their limited height and scale will ensure that these cabinets will not be detrimental to the visual amenity of the area.

In line with the requirements of NPPF, there are no existing suitable telecommunications installations for the operator to share, that would provide the necessary coverage to the target coverage area. Similarly, there are no buildings which are suitable and available that the operator could utilise to operate their equipment. Thus, an additional installation is required in order to provide improved coverage and capacity to this area of Tottenham Hale. Therefore, a new ground-based installation is required.

Capacity refers to the maximum amount of data a network can handle and the number of devices it can support simultaneously. When too many devices try to connect to the network, it can become overloaded, leading to issues like slow internet speeds and dropped calls. This is similar to a highway getting congested when there are too many cars. Even if there is coverage in the area, the network will not operate properly if there are issues with capacity.

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This means that while your device may show a strong signal, the network can still struggle to deliver fast and reliable service if it is unable to manage the high demand.

4G signals by their very nature (as they carry high data rates) do not penetrate over long distances, (5G even less so), just a few hundred metres, depending on the topography of the land, building clutter and vegetation including trees in the area which can reduce their effectiveness. Therefore, 4G and 5G radio base stations need to be close to their customer demand. Therefore, they require a new site to provide improved 2G, 4G and 5G coverage and capacity service provision to this cell area. As this site needs to fill a gap in the operator's network, whose network configuration is well established in the area, the operator's search area is naturally smaller, than would otherwise be the case if the operator wasn't already providing service provision from this location. This severely limits the options for siting a new installation in the area.

As Section 5 above demonstrates there are no more suitable sites that are located within less sensitive locations than the current proposed site, and, as this is a site to fill a gap in the operator's network, therefore, the operator is even more restricted in locating a more suitable site in which to provide new coverage to the target coverage area in this part of Tottenham Hale. A streetworks installation is the most viable option in this area due to the low-lying rooftops, varying topography and residential nature of the area to the west of the site which would not suit either a rooftop or greenfield installation.

Without this site, customers would experience buffering and dropped calls, and they would not be able to utilise their handheld devices in the way for which they were purchased.

In line with NPPF, the proposed installation is an item of essential infrastructure and therefore will not cause any loss of privacy nor will any occupants of nearby properties be overlooked. The column and antennas do not emit any noise, odour, vibration, artificial light or disturbance from air. The only noise emitted is from a cooling fan within the equipment cabinets, which only operate during hot weather conditions. However, within a few metres the noise is inaudible, particularly when taking into account the ambient noise levels of the area which include passing traffic. The proposed installation will not cause any traffic generation as it is not a visitor destination. Maintenance of the equipment cabinets is usually once a year, where the engineer can walk to site with handheld tools.

Appearance

A similar design has already been accepted here. The below provides a comparison between the Cornerstone monopole against the 3UK monopole. As can be seen they are equally slimline in design, with the antennas both unshrouded at the top and both to be painted in a grey colour. Given the principle of development has already been established here by the inspector and the design of the monopole is similar, it must follow this application and design is equally acceptable.

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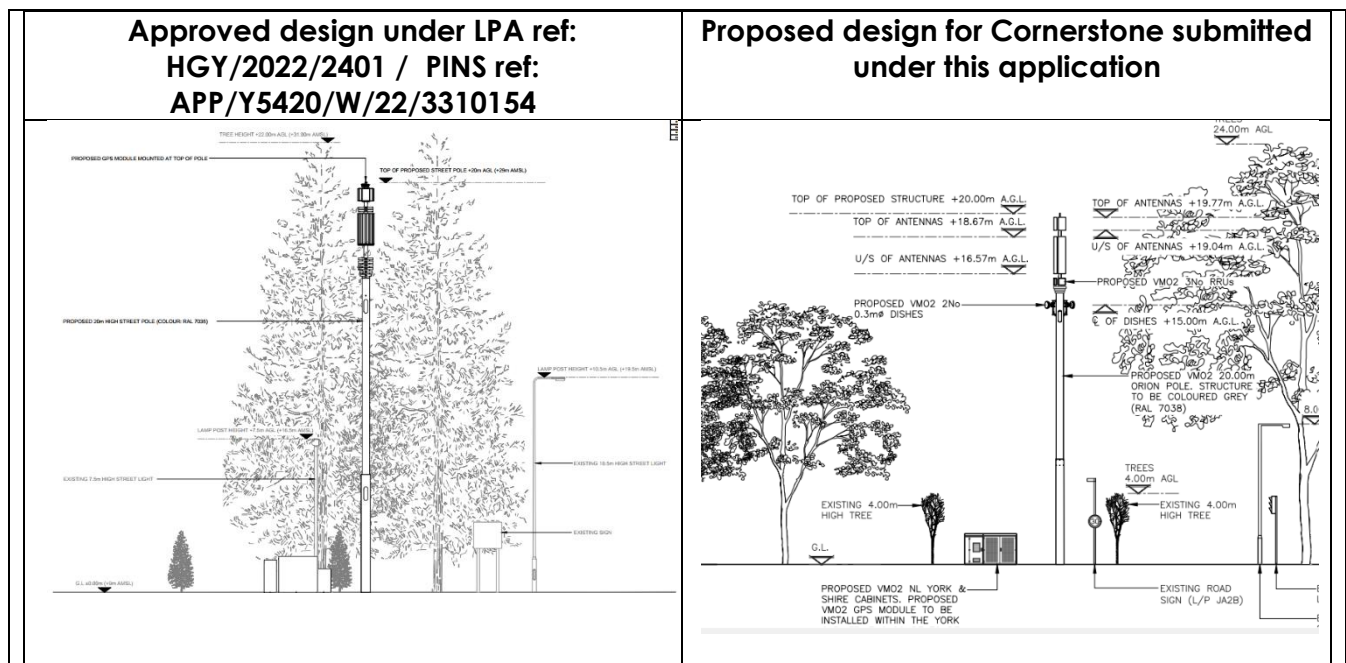
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The design of the monopole has been carefully considered. To this end, it is a simple, functional slim-line monopole, with the main column being split into two sections. This column width is essential in order to safely support the antennas at the top of the column and the feeders for all technologies which are hidden within the main column. The column is proposed to be painted grey, in order to match other elements of street furniture, as well as to blend with the often-grey British sky. However, the monopole can be painted any colour should the Local Planning Authority consider that an alternative colour would be more appropriate.

In order to reduce the visual impact on the surrounding area the antennas have been positioned at the top of the monopole. The antennas are positioned as tight as possible and will only be marginally wider than the main column width, rather than being a bulky headframe, as such will not appear dissimilar to a shrouded design. This is in full accordance with NPPF, the Haringey Development Management DPD and the London Plan.

It is essential that the 5G antennas are unshrouded. As the radio frequencies get higher, required for data carrying, the antennas are less able to propagate through immediate blockages including Glass Reinforced Plastic, which is what the shroud is made from. This affects the 5G antennas more so than any other technology. The result being they cannot operate effectively close to Glass Reinforced Plastic or any other blocking material. Therefore, there is a technical reason why the 5G antennas need to be unshrouded. The latest 4G technology are also affected more so than older technologies by propagation and are therefore less efficient if they are shrouded. As such, the antennas also are proposed to be unshrouded to ensure that the latest technologies are provided to the surrounding area, helping Tottenham Hale, and London to become the smart city-region.

The presence of the linear structures including lighting columns, traffic lights, road signage and bollards, as well as semi-mature and mature trees will ensure that the proposed column

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will not appear incongruous within the street scene. Thus, there will be no detrimental loss of visual amenity to the area or environmental intrusion in line with the Haringey Local Plan, the Haringey Development Management DPD, the Tottenham Area Action Plan, and the London Plan.

The installation of this 20m slim-line column is designed to be as similar as possible to the other linear structures found in the immediate area will be no more at odds with the street scene and character of the area than the other vertical structures within the immediate locale.

It is accepted that the height of the proposed installation is taller than other pieces of surrounding linear items of street furniture. Being taller than more traditional urban items of street furniture in itself is not a valid reason to conclude that it is not appropriate at a specific location. Indeed, Inspectors at appeal have noted that by their very nature to be effective masts are required to be taller than surrounding structures and that telecommunications masts are now common urban items of street furniture.

This is a prior approval application where the principle of this type of development is already established by the Government under the Town and Country Planning (GPD) Order 2015 (as amended) which states that this type of development is permitted subject to the prior approval of the siting and appearance of the installation. This is therefore akin to an outline planning permission. There is nothing in the legislation which limits the number of installations that can be erected in a certain locality, nor that they cannot be located on transport corridors. Given the nature of the area which contains numerous vertical structures and semi-mature and mature trees in a wider area, the proposed radio base station would not appear prominent nor out of place.

If the column were to be any slimmer, then the multi technologies would not be able to fit in the same installation and an additional radio base station would be required which would be contrary to national planning guidance. It would also not be structurally capable of supporting all the technologies including the latest 4G coverage as well as 5G service provision for VMO2. If the column were to be the same width throughout, then it would have to be as wide as the antennas at the top of the column. This would appear more visually prominent in the street scene than the current proposals.

The design of the radio base station is one of the most sensitive designs available to the operators, designed to resemble typical existing urban linear street furniture. This is in line with the requirements of NPPF which supports equipment which is sympathetically designed and camouflaged where appropriate [paragraph 120], and the Code of Practice.

Lack of Coverage – Material Consideration

Since the CK Hutchinson / Three UK site was approved, there has been recent publications at both national and regional level pushing for the improvement of digital connectivity, including digital infrastructure.

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Attached as part of this application is a letter dated 29 November 2024. The letter is from Sir Chris Bryant MP to Council Leaders and Council Chief Executives across the UK in support of digital infrastructure deployment.

The 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 driving towards nationwide 5G coverage by 2030. The letter requests help from Councils across the UK to achieve these goals by prioritising digital infrastructure and focussing on a number of areas that remain a challenge to telecoms investment.

There is a specific ask in the MP's letter that Councils **'support the deployment of communications infrastructure wherever possible'** (emphasis added).

The Government published the UK Government Resilience Action Plan in July 2025. At paragraph 57 - Improving the resilience of Critical National Infrastructure, it states:

*"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"* (emphasis added)

And para 109d –

"further invest in resilient telecommunications capabilities for crisis management response. 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".

These Government publications weigh heavily in favour of the application in regard to the social and economic benefits of telecommunications installations, more specifically 5G can bring.

Further to these, there has been the publications of the London Growth Plan (2025) and the London Infrastructure Framework (2026). Both are focused on boosting London's economy and productivity via different methods, however digital connectivity and infrastructure is seen as key enabler, focus area and important requirement to help achieve their aims. Without the relevant infrastructure in place the Greater London region (including Haringey, London Borough) will not achieve the aims that have been set out. It is vital the right infrastructure is

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in place such as this installation, which has already been accepted in principle both by the Order and at inspector level.

There are clear benefits that will arise from the proposal, all of which that align with the London Growth Plan and the LIF, both of which recognise digital connectivity as the forefront of growth. The Growth Plan recognises that digital is everywhere. It is part of everyday life and used across all sectors. The plan expects artificial intelligence to become a part of everyday life and see's digital technologies as a driver of growth across all the priority sectors.

Infrastructure is a key competent of growth, including digital infrastructure. The plan recognises there are areas that are falling behind and notes digital connectivity infrastructure can help achieve the plans goals.

Part of the 10 year plan, increases in 5G coverage and capacity is seen as an area that can be improved:

"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".

The proposed radio base station is located on the footway of Jarrow Road located in a busy part of Tottenham Hale. To the west of the proposed site is located Tottenham Hale Retail Park, and to the northwest is Tottenham Hale Tube Station. Due to the significant number of daily commuters, as well as the residents and businesses in the area, there is a high demand for high-quality 4G and 5G coverage and capacity. The proposed site will provide new 4G and 5G coverage and capacity, to meet this demand.

Furthermore, the proposed site is located within the Tottenham Hale Growth Area, in close proximity to areas recognised in the Council's Planning Policy Maps as a Locally Significant Industrial Site (265m away) and a Local Employment Regeneration Area (95m away). This further strengthens the need for improved digital connectivity, which will benefit the local economy, make the Tottenham Hale area more attractive to businesses, and help meet the Council's ambitions set out in the Local Development Plan.

Additionally, several new developments are ongoing in the surrounding area, which will result in an increased number of residents, putting higher pressure on the operator's network. As such, the new radio base station is crucial to improving connectivity and meeting the growing demand for mobile services. Approximately 300m northwest of the proposed location, the Heart of Hale development is underway, which will provide seven new buildings, introduce new businesses, and deliver over 1,000 new homes. Therefore, it is imperative that the operator's network is strong enough to meet both current and future demand.

Without the new installation in the area, there will be a gap in the existing coverage due to which the operator's network will struggle to meet the customer's demand in this cell area, as a result the operator's customers will not be able to use their handheld devices as

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intended. Lack of improved capacity in the area will result in buffering and dropped calls, leaving customers with unreliable service in this area.

In accordance with the NPPF, the proposed installation is significant to enable continuous coverage of the telecommunication network, ensuring that this area of Tottenham Hale continues to get the mobile coverage it needs for VMO2 customers as well as new 5G coverage. It will also maintain and improve coverage for the Mobile Virtual Network Operator's (MVNOs) which use the VMO2 network which includes Giffgaff, Sky Mobile and Tesco Mobile. So, the proposal will not only provide a service for one operator but those who buy network space off them, which is at least 3 with VMO2. This will provide a choice for those customers who consider the level of coverage in their area when selecting which operator, they agree future contracts with.

The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place. By providing the latest 4G technology and new 5G service provision the proposals will also help meet the aspiration of the Haringey Local Plan, the Haringey Development Management DPD, the Tottenham Area Action Plan, and the London Plan. It will help in fulfilling the ambition of London Plan in being a pioneering smart city with world-class digital connectivity.

In line with the Haringey Local Plan, the Haringey Development Management DPD, the Tottenham Area Action Plan, and the London Plan, which fully supports the development of 5G, the proposals will provide world-class connections and access to opportunity for all in this cell area, as well as providing world-class digital infrastructure which provides the platform for Tottenham Hale to embrace emerging technologies and societal changes. 5G infrastructure is fundamental to enable digital technologies to function. The proposals will ensure that any VMO2 customer in this cell area will be able to access resilient, seamless connectivity at a speed they need anywhere at any time. Without the more basic technology solutions such as 5G, smart city-region solutions and value-added outcomes will struggle to be brought to fruition.

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

Without this new radio base station, the operator's customers would experience increasing numbers of dropped calls and buffering unable to access the internet on their handheld devices. They would also not be able to access the 5G network, a demand which is increasing rapidly as customers update their handheld devices to ones that are 5G compatible. If the improved 5G network is not available, then the customers' would not be able to utilise these handheld devices for the purposes in which they were purchased. This would be contrary to the aspirations of Central Government which aspires to everyone having access to the superfast highway network wherever they are.

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The way 5G works, it is closely connected with the Smart City agenda and will enable centralised control of lots of different street infrastructure owned or managed by councils, such as streetlights, water meters and bus stops. As such it needs the 21st century infrastructure to enable this objective to become a reality. A new installation in this location enabling enhanced 4G and 5G service provision to the Tottenham Hale area will ensure that this aspiration is fully met.

Access to the internet in whatever medium now impacts every facet of our lives but only benefits those who can access and use it. The benefits of internet connectivity are key for both residents and businesses alike and a new radio base station in this location providing the enhanced 2G, 4G and 5G technologies will support the Haringey Local Plan, the Haringey Development Management DPD, the Tottenham Area Action Plan, and the London Plan.

VMO2 are directly referenced within the LIF as an enabler to growth through improving digital connectivity. London has a low 5G performance according to the LIF with capacity constraints. New mobile sites are required to improve this performance and achieve the LIF ambitions. The proposal is the only macro solution that can solve this issue. The submitted coverage plots evidence the uplift that will arise from the proposal. It is important to remember the plots can't predict capacity issues. The proposal will fix the ongoing coverage and capacity issues being faced due to the introduction of 4G and 5G technologies

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

Economic and Social Benefits

The NPPF strongly supports sustainable development, as does the Haringey Local Plan and London Plan. Mobile communication plays a significant role in sustainable development, being able to access the internet via a mobile device allows people to access a wide range of central and local government services.

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

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A recent report by MobileUK looks into the challenges faced by the industry in bringing about a step change in the sector's capacity for raising capital for significant infrastructure upgrades. The report found, for every pound invested by the operator it returns £5 GDP to the local economy (Mobile UK study). i.e. returning 5 x the value to the local area. The multiplier effect. The proposal should be well balanced between the visual harm compared to the significant social and economic benefits mobile connectivity brings. The operator has a massive infrastructure investment to your area, which should not be understated in its impact on the local economy, Cornerstone is a key enabler to the local economy.

For every £1 invested in digitally upskilling someone equates to £10 back to the local economy. But if they then cannot access the latest technology, it could well push them to leave the area taking their new found skills with them. Without this installation, those living and working in the area will not reap the benefits of 5G.

Every time a planning officer refuses an application for telecoms it means the application cannot invest their money in their infrastructure to deliver better connectivity to your businesses and the multiplier effects are simply not received. i.e. no knock on benefits².

The proposal will meet the ambitions of both the London Growth plan and the LIF. The LIF identifies digital networks as essential infrastructure needed to unlock new homes, support jobs, and enable sustainable growth across the capital. A new radio base station expands capacity and reliability, especially in dense urban areas.

Practical Applications of 5G Connectivity as Example of Material Socio-Economic Benefit:-

Education

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

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

Health

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

² <https://www.mobileuk.org/rebalancing-act>

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

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

Paragraph 38 of the revised NPPF states that:

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

Summary

The proposed site has been carefully selected on the footway of Jarrow Road, to the south of the junction with Ferry Lane. An appeal has been allowed in a similar location along this section of Jarrow Road. An agent, on behalf of the applicant, has confirmed with the planning authority the preferred location is the one being submitted under this application. The appeal site location detailed above at discount 13 would restrict the view of the traffic light and CCTV camera installed on the top of the traffic lights. This would not be acceptable, therefore the cabinets and pole are located away from the sight lines of these items of street furniture and will not impact highway safety.

An installation at this location will benefit from partial screening, with a backdrop of semi-mature and mature trees, minimising its visual impact on the surrounding area. Furthermore, the chosen siting ensures that the mast is not directly in front of any residential properties. The nearest properties, located on the opposite side of Jarrow Road, will view the mast at an acute angle against the backdrop of semi-mature and mature trees, further reducing its visual impact. Additionally, there are numerous other vertical structures in the vicinity of the proposed installation, including lighting columns, traffic lights, bollards, and road signage, as well as semi-mature and mature trees, some of which rise to 24m in height. As this is a prior approval application, the Government confirms that this is permitted development, akin to outline planning permission, with just the finer details of siting and appearance to be considered by the local planning authority. The vertical structures help the proposed installation assimilate with the street scene and not appear alien in the immediate area.

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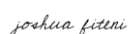
The proposed height at 20m is essential in order for the antennas to clear the surrounding urban clutter, trees and ensure the antennas are able to reach the target coverage area, to maintain and provide improved capacity for 4G and 5G service provision to Tottenham Hale. This will fully meet the national Governments aim of '*ensuring that everyone is connected to the information superhighway*' and the national policies set out in the NPPF. If the height of the column were to be reduced then the antennas would not be able to operate effectively, leading to a degraded service for the operator's customers especially for the higher frequency technologies including the latest 4G technology and new 5G service.

The new installation is required to improve capacity of the operator's network in this area. Capacity refers to the maximum amount of data a network can handle and the number of devices it can support simultaneously. When too many devices try to connect to the network, it can become overloaded, leading to issues like slow internet speeds and dropped calls. This is similar to a highway getting congested when there are too many cars. Even if there is coverage in the area, the network will not operate properly if there are issues with capacity. This means that while your device may show a strong signal, the network can still struggle to deliver fast and reliable service if it is unable to manage the high demand.

Site selection was progressed in accordance with the applicant's licence obligations, advice in the NPPF and the Code of Practice and represents the least environmentally intrusive, technically suitable, available option.

The social and economic benefits of providing reliable and high quality mobile broadband connections including 5G support growth in productivity, efficiency and labour force participation across the whole economy. This is fully supported by the NPPF, the Haringey Local Plan, the Haringey Development Management DPD, the Tottenham Area Action Plan, London Growth Plan and the LIF. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area.

Confirmation that submitted drawings have been checked for accuracy

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Signed:		Date:	26/06/2026
Position:	Town Planning Manager	(on behalf of Cornerstone)	

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