

## SUPPLEMENTARY INFORMATION

### 1. Site Details

Site Name:	Long Lane Farm	Site Address:	Land at Long Lane Farm, Ickenham, Uxbridge, London, UB10 8QT
National Grid Reference:	E: 508040 N: 185129		
Site Ref Number:	CS_136106_35	Site Type: <sup>1</sup>	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:		
Upgrade of an existing base station.		
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:	25/06/2024
Name of contact:	N/A

<sup>1</sup> Macro or Micro

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

**Summary of outcome/Main issues raised:**

A pre-application consultation letter and drawings of the proposal were sent to the Local Planning Authority, by email, on 25/06/2024.

No response has been received to date.

**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 VMO2 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's 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 the planning department at the earliest opportunity from when they are instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss our 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 long term partnerships and will always work with you to deliver improved mobile connectivity.

**Community Consultation**

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:			

Pre-application consultation was carried out with the ward Councillors for Ickenham & South Harefield (Councillors Kaushik Banerjee, Eddie Lavery and Martin Goddard). A pre-application consultation letter and drawings of the proposal were sent to the Councillors on 25/06/2024.

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

No site specific comments were received.

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

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

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**Registered Address:**

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Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.  
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None nearby in line with Code of Practice.
Outline of consultation carried out with school/college (include evidence of consultation):  N/A
Summary of outcome/main issues raised (include copies of main correspondence):  N/A

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

Will the proposed development be on a civil safeguarding area or a defence safeguarding area?	<b>Yes</b>	
Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area been notified?	<b>Yes</b>	
Details of response:		
<p>An aerodrome notice and copy of the proposal drawings were sent to Heathrow Airport, RAF Northolt and the CAA, by email, on 06/09/2024. Copies of the notices and proof of delivery enclosed.</p> <p>If any responses are received they will be forwarded on to the Local Planning Authority.</p>		

**Developer's Notice**

Copy of Developer's Notice enclosed?	Yes
Date served:	Developer's Notices sent via Tracked Email on 06/09/2024. Copy of developer's notice and proof of delivery enclosed.

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### 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 VMO2's continued network improvement program, there is a specific requirement for an upgrade to the existing installation at this location to provide enhanced 4G coverage and capacity, as well as new 5G coverage, ensuring that this area of Ickenham has access to the latest technologies.

The site is an established radio base station comprising a 25 metre high monopole supporting 24 no. antennas and 3 no. transmission dishes, with equipment cabinets and ancillary development thereto, located within a fenced compound. The tower is shared by VMO2, Vodafone, and other licensed operators (LOOs). It is located on agricultural land, at Long Lane Farm, to the south east of the suburb of Ickenham. The principle of a base station in this location is accepted.

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.

Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities. The upgraded site will provide additional 4G coverage and capacity which is much needed for reliable connectivity as well as new 5G services and will ensure good quality critical infrastructure to support strong inclusive communities and contribute to economic opportunities.

Further information is provided in Section 4 'Technical Justification' below and the additional information sheets, '5G Services' and 'Radio Propagation'.

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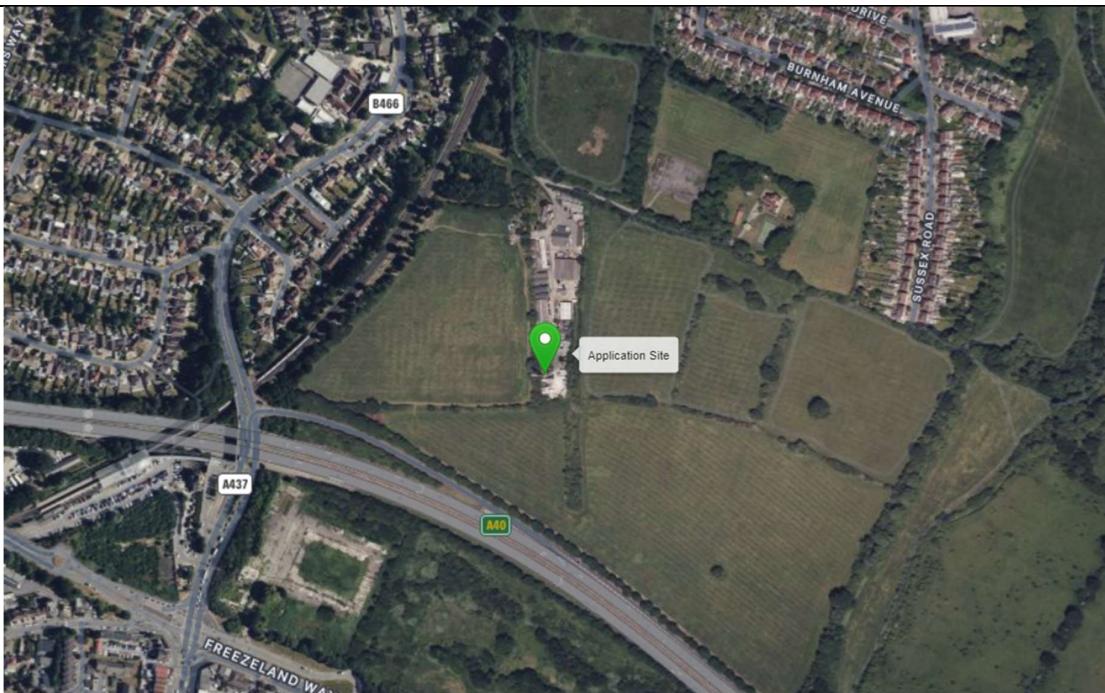
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**Image 1a: The Application Site (Source: Grid Reference Finder)**



**Image 1b: The Application Site**

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

The amendments to the existing, established ground-based installation will enable enhanced 2G/4G coverage and capacity to the surrounding area as well as new 5G service provision for Telefónica to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

3G (UMTS – Universal Mobile Telecommunications Service) is being phased out by the operators who are soon to switch off their 3G networks in order to enhance 4G/5G services. VMO2 has announced that it will start to switch off its 3G services in 2025 as part of its ongoing network transformation.

<https://news.virginmediao2.co.uk/virgin-media-o2-to-begin-switching-off-3g-in-2025-with-enhanced-customer-experience-as-network-evolves/>

Type of Structure (e.g. tower, mast, etc): Swann CS5S Lattice tower c/w Delta headframe

Description:

The removal of the existing 25m lattice tower with headframe and replacement with 27.5m lattice tower with headframe, the removal and replacement of 3 no. existing antennas with 3 no. upgraded antennas, the relocation of 21 no. existing antennas on the new tower and headframe, the installation of 2 no. additional transmission dishes, the relocation of 3 no. existing transmission dishes, the removal and replacement of 1 no. meter cabinet, and ancillary development thereto. Top height of antennas to be 28.50m AGL.

Overall Height:	28.5 metres
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Height of existing building (where applicable):	N/A
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Equipment Housing: As existing – internally within equipment cabin	
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Length:	N/A
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Width:	N/A
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Height:	N/A
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Materials (as applicable):

Tower/mast etc – type of material and external colour:	Steel – Galvanised (Grey)
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Equipment housing – type of material and external colour:	As existing
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Reasons for choice of design, making reference to pre-application responses:

The existing radio base station has been in situ in this location for a number of years and has become an established part of the area. Technological advances (including 5G service provision) and additional demands on the operator's mobile network system in the area have meant that upgraded antennas need to be installed to facilitate all the data that is required to be carried for mobile superfast broadband. This enables customers to continue to be able to use their handheld devices for the purposes in which they have become accustomed.

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and now rely on in the modern world we live in, a similar scenario to the reliance on gas and electricity. However, this new technology and the design of the antennas required for 5G means that the existing column is not able to support this new technology and therefore a new slightly bigger column is required.

The proposed tower height at 27.5m is essential in order to provide enhanced coverage to the target coverage area. New 5G 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 a slight increase in antenna height in 5G.

This is the slimmest design possible which will enable all technologies to be supported from this site and to allow all operators to continue to share the same tower. If the column width were to be any slimmer then it would not be capable of supporting the required headframe, the technologies would not fit on the same 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 surrounds than the proposed design.

The design of the column maintains its simple, functional, vertical structure which will not appear incongruous within the area. The column is proposed to be coloured grey to match the existing, and will better assimilate with an often grey sky; however, it can be coloured any other colour the LPA consider appropriate if necessary.

It is not considered that the slight increase in height will have an unacceptable visual impact on the streetscene. The proposed width of the headframe is the minimum required to support the 5G antennas, which are much heavier than those of earlier technologies. The positioning of the telecommunications site, to the southern end of Long Lane Farm, means that the site is only visible from limited public vantage points, which are predominantly long-range glimpsed views from the arterial routes along the A40 and B466.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site. Taking all matters into account it is considered that this proposal, to provide the latest 2G/4G service provision and new 5G coverage, providing high quality dense coverage and capacity, would not appear out of place within the landscape.

#### Health and Safety - including ICNIRP compliance

An ICNIRP certificate is provided as part of this application.

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<p>International Commission on Non-Ionizing Radiation Protection Declaration enclosed</p> <p>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.</p> <p>When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, VMO2 operate their networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p> <p>As part of VMO2's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>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.</p> <p>The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic</p>	Yes	

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services or instrumentation operated in the national interest.		
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#### 4. Technical Justification

**Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.**

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

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

There is a specific requirement to upgrade the existing Cornerstone radio base station at this location to allow the operator to enhance its 2G/4G coverage and capacity, and provide new 5G service provision, to this area of Ickenham.

#### 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)

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
Greenfield – D1	Land in Industrial Area at Long Lane Farm, Hillingdon, UB10	E: 508025 N: 185286	There is limited space in this location due to the existing operational uses within the area. An additional installation in this location would cause proliferation of sites, contrary to the NPPF. As the existing site could be upgraded in this instance by swapping out the tower, resulting in only a slight increase in overall height and width, it was considered that upgrading the existing site would be the best option from a visual impact perspective. As such, this option was discounted in favour of upgrading the existing site.

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Greenfield – D2	Land to south of Playing Fields, Long Lane Farm, Hillingdon, UB10	E: 508189 N: 185312	An additional installation in this location would be closer to residential properties and the playing fields, and the visual impact of this on the surrounding area, recreational users of the playing field and nearby residents would be greater than if the existing site was upgraded. For these reasons, this option was discounted in favour of upgrading the existing site.
Greenfield – D3	Land to east of railway, Hillingdon, UB10	E: 507907 N: 185299	This location has been discounted as it is on undeveloped land with the Green Belt. Although the existing site is also located within Green Belt, it is within an existing developed area where the principle of a telecommunications site is already established. An additional installation here would also be more visually apparent for people travelling on the nearby railway and from the rears of residential properties on Turnstone Close.
Rooftop – D4	Various Buildings within Industrial Area, Long Lane Farm, Hillingdon, UB10	Various	None of the buildings within the area are suitable for hosting telecommunications equipment. They are all low in height, constructed of lightweight material, with pitched/sloped roofs. They would not be capable of structurally hosting the weight of the apparatus required for all of the operators, nor would the height be adequate to provide adequate coverage to the surrounding area. As such, the buildings were discounted.

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

In accordance with the licence obligations and advice in the NPPF, the applicant's network roll out team followed a sequential approach when seeking to improve coverage/capacity and introduce 5G services to the area.

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.

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The proposal is for the upgrade of an existing site and therefore alternative sites, which would all involve the installation of an additional structure, were discounted on visual amenity grounds. The upgrade of the existing site is considered to be the preferential option as it will ensure that all operators remain sharing the same structure, in line with NPPF. Although the upgraded tower will be slightly taller and wider than the existing, this is necessary due to the amount of operators sharing the site and the multiple technologies that VMO2 will offer from this site (2G, 4G and 5G, with 3G available until the switch off in 2025). The proposed upgrade ensures that the visual impact of the development on the surrounding area is minimised, so far as is practicable.

#### Land use planning designations:

The site is not located in Article 2(3) land but is located within the Green Belt.

The application site is located in the Green Belt. Part 16 of the General Permitted Development Order does not remove or restrict permitted development rights for telecommunication sites located within defined Green Belt/Metropolitan Open Land areas. The Statutory Instrument establishes the principle of development in such areas and accordingly there is no requirement for the appellant to assess whether the proposed use is and 'inappropriate' use in the Green Belt or present a case setting down 'very special circumstances' to justify the development in line with the requirements of the NPPF.

Accordingly, local plan policies relating to the Green Belt should not be applied to the decision-making process of this application. This is a well-established approach to prior approval applications for telecommunications development within the Green Belt as set down within numerous decided appeals such as APP/R5510/W/15/3133767 where, at paragraph 5, the Inspector states, '*as the appeal relates to a matter concerning prior approval, it is not necessary for me to consider the proposal in the context of the site's location within the Green Belt. Accordingly, I have not considered this policy matter further*'. The same conclusion is reached at paragraph 8 of APP/R5510/W/16/3156200 where the Inspector states, '*the principle of this proposal is not in question and as such the matter of circumstances permitting development in the Green Belt does not apply*'.

In the decision for appeal APP/C3430/A/12/2172974, against the refusal of South Staffordshire District Council for prior approval for a 12 metre high mast and associated development thereto, the Inspector stated:

*"The permission granted under the GPDO is equivalent to an outline planning permission and the Council's considerations of the matter are limited to the effects of the development arising from its siting or external appearance, not the principle of the development. Although the site is within the Green Belt, it seems to me, therefore, that there is no scope to consider whether the scheme represents inappropriate development in the Green Belt, or whether very special circumstances need to be demonstrated to justify the granting of approval for it. On that basis, the Council's first reason for refusal is outside the scope of the matters they were able to consider and should therefore be disregarded."*

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A recent appeal decision which reinforces the approach that should be taken in the Green Belt in respect of prior approval approvals. In the appeal in the London Borough of Havering, prior approval for a 25m high lattice mast was refused (APP/B5480/W/20/3251086, Land at Havering College of Further and Higher Education, Tring Gardens, Harold Hill, Romford RM3 9ES).

At Para. 8 the Inspector stated “*Although the appeal site is in the Green Belt, the Council has accepted that the proposal benefits from permitted development rights, subject only to matters of appearance and siting, and that consequently the principle of the development is not relevant. I agree with this approach. The development's visual impact on the Green Belt, due to its appearance and siting, is taken into account in the above assessment*”.

The development therefore benefits from deemed planning permission under the GPDO, subject to prior approval by the local planning authority. The provisions of the GPDO require the local planning authority to assess the development solely with regard to siting and appearance, taking into account any representations received.

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. The NPPF is pro – development with a 'presumption in favour of sustainable development' being seen as a golden thread, running through both plan making and decision taking’.

The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

It is not necessary to quote extensively from this document but the following points are highlighted.

### **National Planning Policy Framework (December 2023)**

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. It was most recently updated again in December 2023, in relation to a number of themes including; flexibility for planning authorities in local housing need, clarification of Green Belt boundary alterations and acceptable brownfield development within the Green Belt. It strengthens the importance of building ‘beautifully’ and respecting the character of an area. It removes the need for annual five-year land supply updates, and

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protects neighbourhood plans from speculative development for five years. Also, the update encourages community-led and self-build developments and further protects agricultural land in its availability for food production. The update does not change any parts relating specifically in relation to telecommunications.

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 118 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

The NPPF continues to support the expansion of electronic communications networks at paragraph 118. 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 supports the expansion of telecommunications:

*"Planning policies and decisions should support the expansion of electronic communications networks..." (para. 118).*

Paragraph 119 of the NPPF sets out the requirement to minimise the number of installations consistent with the efficient operation of the network and also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 122 of the NPPF retains guidance from a previous NPPF version which relates to local planning authorities 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.

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The NPPF continues to provide guidance on decision-making. At paragraph 38 it states that:

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

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<sup>42</sup>..."*

Footnote 44 of the NPPF states:

*"The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future."*

### **Code of Practice for Wireless Network Development in England (March 2022)**

The Code of Practice (COP) provides guidance to Code Operators (referred to as 'operators' throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The aim of the Code of Practice is to support the government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

The Code of Practice covers all forms of wireless infrastructure development, including mobile masts and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

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Theale, Berkshire, RG7 4SA

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

The COP sets out the legal and policy framework for the delivery of wireless infrastructure development.

Paragraph 8 of the revised Code acknowledges that connectivity is vital to enable people to stay connected and that fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code continues to acknowledge that as the demand for mobile data in the United Kingdom is increasing rapidly, and that it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.

The Government recognises the role of Planning in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity.

Paragraph 13 of the Code continues to echo the NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth. More specifically that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G) in order to support economic growth across the country.

The COP sets out 'How wireless networks function.'

Para.16. states "Cellular wireless networks use base stations to provide an area of radio coverage. Wireless technology uses the radio spectrum to broadcast radio waves between base stations and devices. Different radio frequencies have different characteristics which, along with the density of cell site locations, affect the extent of coverage and how much data can be carried over the network. Depending on the radio frequencies used, base stations can deliver coverage over a wide area or provide extra network capacity in areas where there is a high demand for network bandwidth".

Para. 17 sets out that "Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications".

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



Cornerstone, Hive 2,  
1530 Arlington Business Park,  
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The COP establishes 'Principles and commitments' by which operators should develop their networks and that Local Planning Authorities should demonstrate their support by.

Para. 18 states "Operators should develop their networks and install wireless infrastructure according to the following principles and commitments:

- **Site sharing and use of existing infrastructure:** make use of existing structures, sites and masts wherever possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and sites should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion.
- **Consultation with local planning authorities, local communities and other stakeholders:** participate in dialogue with local planning authorities, along with other relevant stakeholders such as the highways authorities, Area of Outstanding Natural Beauty bodies, Historic England, and Natural England, including pre-application discussions, where appropriate. Maintain clear procedures, and high quality communication and consultation with local communities and other interested parties. Operators should agree community engagement with local planning authorities and share information as appropriate (see Pre-application consultation with local communities below).
- **Standardised and high-quality approach to planning applications, and the notification procedure:** provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements. Ensure planning submissions are of high-quality and provide the necessary evidence to support the application (as per the NPPF).
- **Prompt responses to enquiries:** respond to complaints and enquiries within a timely manner (see Review and Enquiries section below).
- **Siting and Design:** wireless infrastructure should be deployed in accordance with the guidance set out within this Code of Practice. Where appropriate, equipment should comply with the principles set out in the NPPF and consider any local planning policies, including any local and national design codes. When located in protected landscapes and other designated land, the sensitive nature of these areas must be considered.
- **Removal of redundant equipment and site restoration:** ensure that when infrastructure is upgraded, any equipment that is made redundant by the upgrade, such as brackets, is removed to benefit the local environment. Where a whole site is no longer in use, the site should be restored to its original state.
- **Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure levels guidance:** as required by spectrum licences, comply with international guidelines for limiting exposure to electromagnetic fields (EMF) - including, as set out in the NPPF, providing a statement that self-certifies that ICNIRP guidelines will be met with all applications (see Annex C).

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Paragraph 19 states that Local Planning Authorities should demonstrate their support by:

- **Incentivising connectivity:** support the expansion of telecommunications networks and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.
- **Facilitating sites:** engage with operators when new sites have been proposed and discuss site requirements.
- **Engagement with operators:** respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.
- **Information and communication:** ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives)".

The added emphasis on support from Local Planning Authorities in the deployment in digital infrastructure is even more evident in the revised COP. The COP recognises the importance of collaboration and partnership to help drive network coverage across the country. It goes on to state that '*In all instances, it is important for all parties involved in the process to take a positive approach to consultation and engagement*'.

### Siting and Design Principles

The government's objective is to deliver high quality, reliable wireless infrastructure whilst ensuring the impact of new network development is kept to a minimum. The siting and design of wireless network infrastructure is central to achieving this. The COP acknowledges that '*good siting and design principles should apply to all wireless network development and take into account any site specific considerations and context. Both can create better places in which to live and work and help make development acceptable to communities*'.

The Code provides guidance on siting and appearance principles. It sets out several design principles in respect of telecommunications development and acknowledges that the options for design used by an operator will be affected by site conditions including requirements to link the site to the network, landscape features and coverage and capacity requirements. The guidance includes at Para. 22 '*the choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible*'.

Para. 23 confirms that there should be a '**presumption in favour of facilitating sustainable network development**' and, as such, operators and local planning authorities, as well as all other bodies involved in the deployment process, should work together to ensure connectivity needs are met and find viable solutions to deployment issues (emphasis added).

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Paragraphs 24 - 27 sets out general siting and site selection principles which Operators should consider. The COP acknowledges at Para. 24 that 'Operators use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 3G, 4G and now 5G. Once an operator has identified a requirement for a new cell site, a suitable site needs to be found. Elements that make a site favourable include: having existing or ready access to a power supply, access to fibre optic cables, vehicular access, and, other buildings and development which may provide a level of existing screening. Operators will typically look to upgrade existing infrastructure prior to considering a new deployment, in particular for initial 5G deployment'.

Para 25 notes that 'When selecting sites for mobile infrastructure, operators should examine local plans and designations for the area, as well as carrying out an in-person site search to identify potential options which meet their requirements. Operators should follow these general siting and site selection principles:

- Installation on existing buildings and structures;
- Erecting new ground based masts;
- Camouflaging or disguising equipment where appropriate;
- Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage); and
- Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator)'.

Para. 26 highlights that the installation of all wireless infrastructure requires a balanced approach between the technical needs and constraints of the proposed site and the potential impact of the development. The three key technical and operational considerations for installation sites are:

- **Coverage:** wireless infrastructure needs to provide an appropriate level of coverage over the intended geographical area. This involves ensuring that antennas are elevated sufficiently (often via masts) to provide clear lines of sight for signals.
- **Capacity:** where existing network infrastructure can no longer meet the demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand. This is more likely to be required in densely populated areas or areas of high footfall.
- **Backhaul:** the radio access network requires a connection to the core network. Backhaul is sometimes provided by a microwave link, which requires a clear line of sight between the two ends of the link.

Para 27 requires that Local Planning Authorities consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. Para. 27 further considers that in general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF),

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unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations

In respect of 'Design', the COP at Para 28 acknowledges that the siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact including

- Protecting visual amenity
- Mitigating visual impacts

Para. 29 acknowledges that these factors along with location and the coverage and capacity requirements can influence the type of infrastructure structure that is deployed and requires that 'planning authorities should be aware of these constraints when considering proposals. In particular:

- In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.

The COP establishes radio equipment housing (cabinets) principles. The COP at Para. 30 states that "cabinets protect radio transmitters and receivers, provide the power source for mobile equipment, and are connected to antennas via cables. Equipment cabinets are likely to be needed at most sites. The cabinets must be of sufficient size to facilitate hosting various operating equipment whilst also allowing air circulation to reduce the potential for overheating". The COP establishes the planning and visual considerations for siting radio housing. These include:

- Colouring
- Siting on highways and footways:
- Highway safety:
- Listed buildings/ scheduled monuments and Conservation Areas:
- Access
- Trees

### **Local Policy**

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 Local Plan for the area comprises:

- The London Plan (Adopted 2021)
- The Hillingdon Local Plan Part 1 & 2

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## The London Plan 2021

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

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

*'Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:'*

*'... C provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation D seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city'*

*'I support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.'*

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

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

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

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

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

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

GG5 'Growing a good economy' states:

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

*'... D ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth  
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 proposed base station installation is critical infrastructure which will provide world class digital connectivity which will support the digital economy. Reliable mobile digital connectivity supports London's growth, and contributes to the low carbon economy by

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enabling flexible working amongst other things. In terms of supporting London's role in innovation toward growing a good economy.

Para. 2.0.4 notes that infrastructure is key to this delivery, with 'proper planning of utilities and communications capacity and the social infrastructure that supports the day-to-day lives of Londoners'. Para.2.0.6 add that the Central Activities Zone (CAZ) and town centre network 'are complex parts of London, with a wide mix of uses and unique local character' which 'have a crucial role to play in supporting London's growth'.

Para. 2.0.7 states that 'Growth and change have not always benefited Londoners equally' .... 'To address this, it is important that there is a strong focus on sustainable and inclusive regeneration in these areas, with boroughs, the Mayor and other partners working closely with the local community to bring about the right sort of change and investment'.

Para. 2.1.69 states '**Central London is a key driver for both London's economy and the UK economy as a whole, comprising both the CAZ** and Northern Isle of Dogs (see Policy SD4 The Central Activities Zone (CAZ) and Policy SD5 Offices, other strategic functions and residential development in the CAZ) and the closely related areas of Canada Water and City Fringe/Tech City. It contains a large number of OAs, many of which are maturing or underway and benefiting from successful development schemes that will be completed over the next few years'(emphasis added).

Policy SD4 relates to 'The Central Activities Zone' (CAZ) and states:

'... Infrastructure to sustain and enhance the CAZ and its agglomeration of strategic functions including its public transport and digital connectivity and its potential to accommodate new development should be secured.'

Para. 2.4.1 states 'The CAZ is the vibrant heart and globally-iconic core of London. It is **one of the world's most attractive and competitive business locations**. It accommodates one third of London's jobs and generates almost 10 per cent of the UK's output. It contains the seat of national Government and is internationally renowned for its culture, night-time economy, tourism, shopping and heritage. It is also home to more than 230,000 residents'(emphasis added).

Para. 2.4.2 states 'The density, scale and mix of business functions and activities in the CAZ are unique and are underpinned by the connectivity provided by public transport, walking and cycling networks. This agglomeration results in exceptional levels of productivity, which is not replicated elsewhere in the UK, and provides national benefits. It **requires different or tailored approaches** to the application of national policy to address its distinct circumstances'(emphasis added)..

Para. 2.4.4 sets out the **strategic functions** of the CAZ which include, but are not necessarily limited to:

- "a. functions associated with the State, Government and Monarchy
- b. diplomatic organisations (such as embassies and high commissions)

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- c. agglomerations of nationally and internationally significant offices and company headquarters connected with finance, business, professional bodies, associations and institutions
- d. uses connected with science, technology, media, communications and cultural sectors of regional, national and international importance
- e. centres of excellence for higher and further education and research
- f. centres of medical excellence and associated specialist facilities
- g. legal establishments of regional, national and international importance
- h. arts, culture, leisure, entertainment and activities and areas of regional, national and international importance
- i. retailing, including specialist outlets, of regional, national and international importance
- j. tourism facilities including hotels and conference centres
- k. specialist creative clusters including for example clothing, fashion, jewellery, printing, antiques, musical instruments, art and culture
- l. transport facilities, especially for public transport of regional, national and international importance
- m. places of worship and places of assembly of regional, national and international importance
- n. use and enjoyment of the River Thames
- o. heritage, built environment, the Royal Parks and other green and open spaces (public and private)". (emphasis added)

Para. 2.4.17 acknowledges that '**Digital connectivity** and associated infrastructure is a key consideration in the CAZ where densities of commercial development in particular are high. Where necessary, development proposals should seek to aggregate demand in areas not currently served by high-speed connectivity and liaise jointly with providers to ensure that infrastructure requirements can be planned and delivered appropriately (see Policy SI 6 Digital connectivity infrastructure)'.

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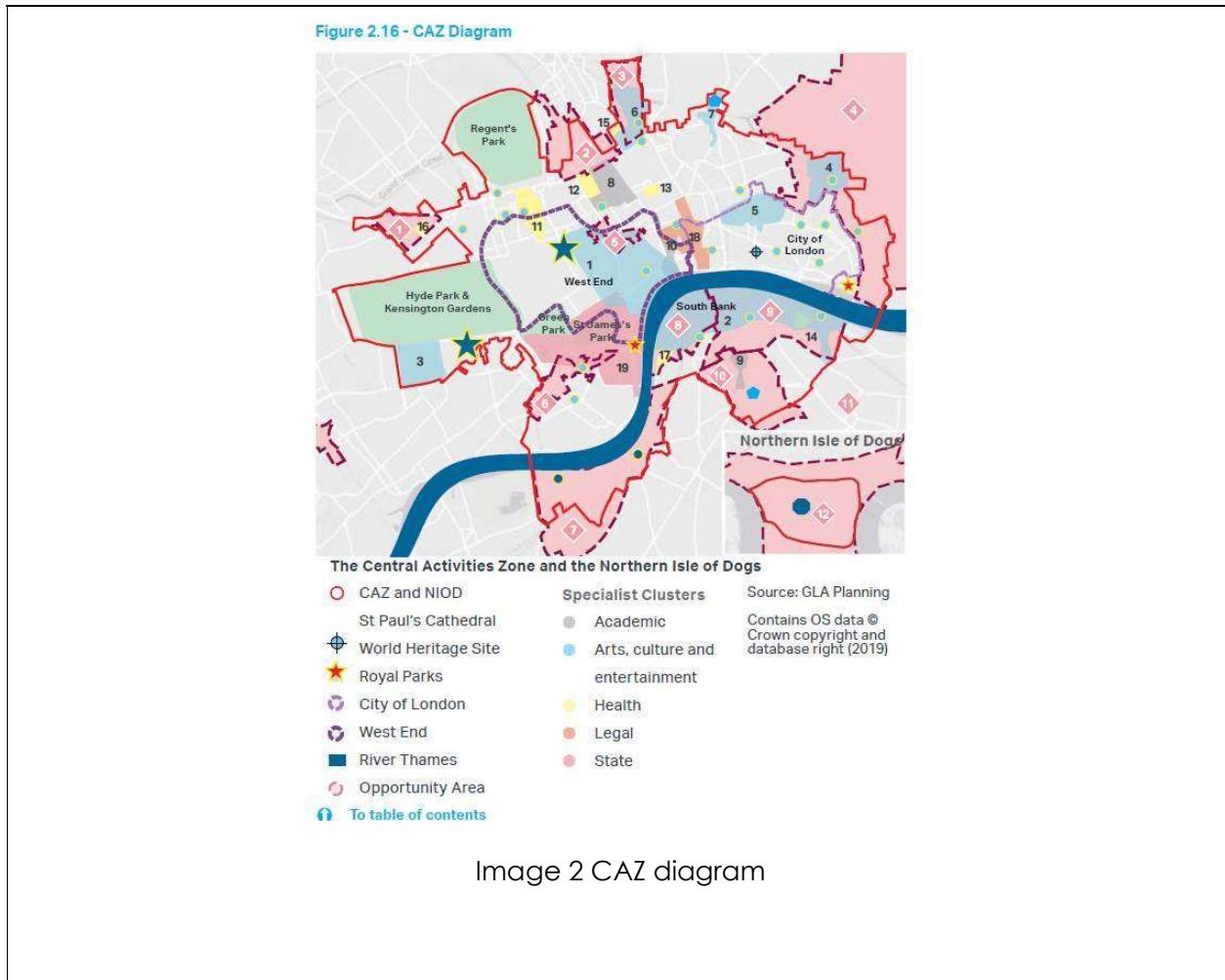
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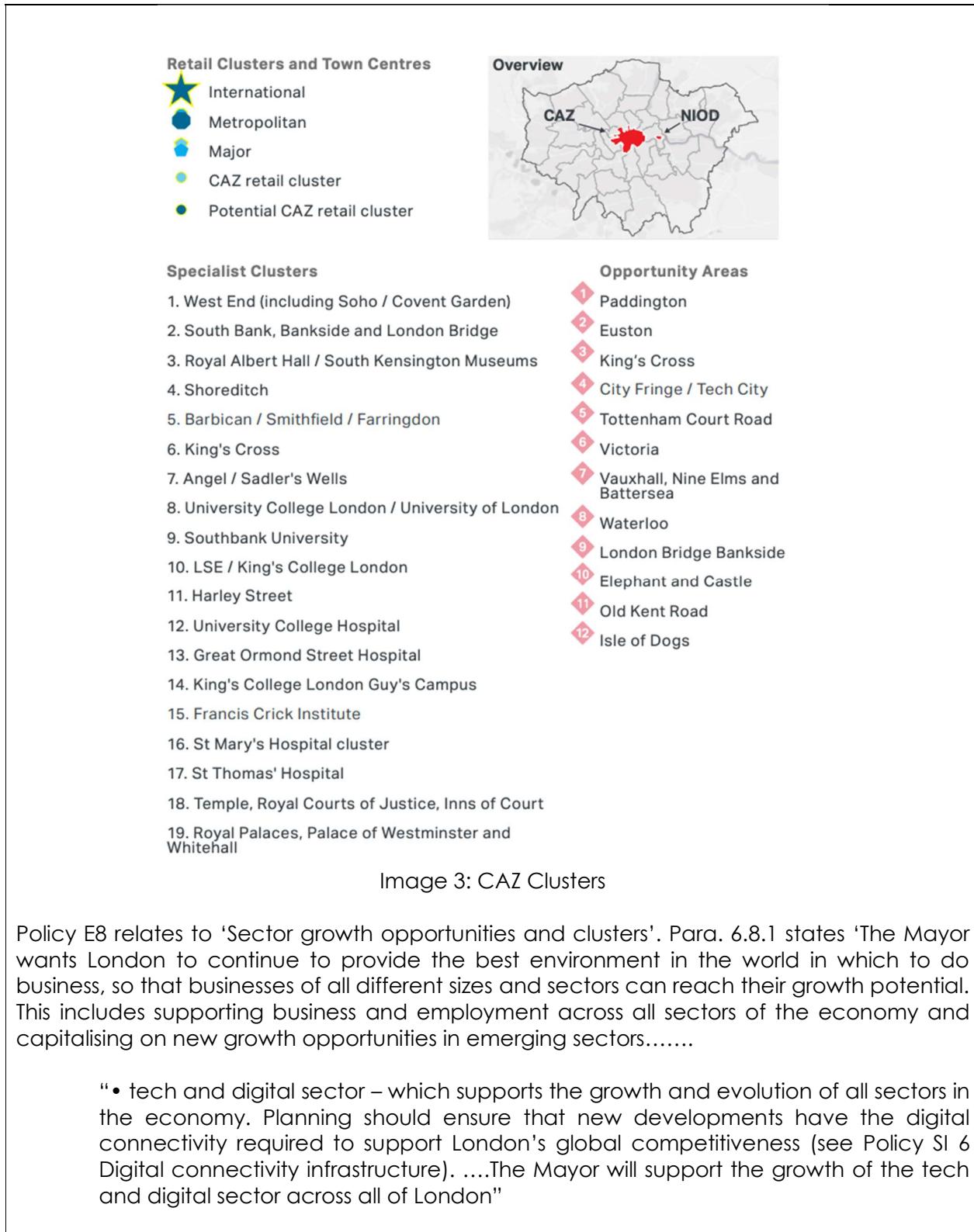
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**'tech and digital sector** – which supports the growth and evolution of all sectors in the economy. Planning should ensure that new developments have the digital connectivity required to support London's global competitiveness (see Policy SI 6 Digital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

Digital connectivity and the benefits it brings to London's global competitiveness now and in the future receives more prominence and importance in the London Plan 2021. Paras 9.6.1 – 9.6.9 encourage the delivery of high-quality / world-class digital infrastructure.

Policy SI 6 relates to 'Digital Connectivity 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).

Paragraph 9.6.6 states 'Access for network operators to rooftops of new developments should be supported where an improvement to the mobile connectivity of the area can be identified. Where possible, other opportunities to secure mobile connectivity improvements should also be sought through new developments, including for example the creative use of the public realm'.

Paragraph 9.6.8 states 'The Mayor will work with network operators, developers, councils and Government to develop guidance and share good practice to increase awareness and capability amongst boroughs and developers of the effective provision of digital connectivity and to support the delivery of policy requirements. The Mayor will also help to identify spatial gaps in connectivity and overcome barriers to delivery to address this form of digital exclusion, in particular through his Connected London work. Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their Development Plans'.

The policies relating to Design (Chapter 3) and heritage conservation (policy HC1) seek to promote proposals that are of 'good design' and are sympathetic to the heritage assets and their surroundings. The base station is well positioned and of a scale, appearance and shape that responds to the local context and historic assets while also acknowledging the area's social and economic needs. The proposed base station is considered to protect and conserve the heritage asset so far as practicable, and any perceived harm to the heritage asset is considered to be outweighed by the significant public benefits of providing 5G coverage for the operator to this busy area of Hackney. A Heritage Impact Assessment is enclosed

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

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## Hillingdon Local Plan

The Local Plan is the foundation for how planning will be controlled in Hillingdon.

### Local Plan Part 1 - Strategic policies

The Local Plan Part 1 sets out the overall level and broad locations of growth up to 2026. It comprises a spatial vision and strategy, strategic objectives, core policies and a monitoring and implementation framework with clear objectives for achieving delivery. These policies are supported by more detailed policies and allocations set out in the Local Plan Part 2.

### The Vision - where we want to be

The Vision for Hillingdon 2026 states:

*"Hillingdon continues to prosper, through the implementation of the following seven point vision:*

*Hillingdon is taking full advantage of its distinctive strengths with regard to its places, communities and heritage: The special character of the borough's natural and built assets have been protected and enhanced, fewer heritage assets and wildlife habitats are at risk, there are more locally-distinct buildings, and new higher standards of development, integrating renewable energy technology. More residents are accessing the borough's waterways and quality public open spaces, particularly in Harefield and south of the A40.*

*The social and economic inequality gaps in Hillingdon are being closed: The social and economic contrast between different parts of the borough have been improved. Hillingdon residents are benefiting from safer and more inclusive communities with issues such as health inequalities being addressed and regular community engagement being provided on local planning matters. Successful strategies have identified and addressed the particular reasons for inequalities in areas of identified need.*

*Improved environment and infrastructure is supporting healthier living and helping the borough to mitigate and adapt to climate change: Areas lacking the social, physical and green infrastructure required to support healthy lifestyles have been identified and measures are well under way to address these. Improved building design and less reliance on cars has helped the borough to reduce its carbon footprint and action has been taken to improve air quality. Generation of energy from renewable sources is common practice and older housing stock is also benefiting from climate change initiatives. Town and neighbourhood centres are the focus for community activities and have a diverse range of uses including health clinics, cultural activities, local and business services, as well as retail and office uses.*

*Economic growth has been concentrated in Uxbridge, Heathrow and the Hayes/West Drayton Corridor, without ignoring local centres: Sustainable growth around Heathrow and the Hayes/West Drayton Corridor (Heathrow Opportunity Area) is being managed through*

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the Heathrow Opportunity Area Framework. Hillingdon has maximised the potential of its heritage assets and places which could act as a focus for individual regeneration initiatives and continues to retain viable mineral resources within the Opportunity Area. Regeneration in Hayes and West Drayton town centres is under way through new high quality mixed-use development and Crossrail stations. The best use will have been made of the Grand Union Canal. Uxbridge has expanded its role as the main urban centre in the borough through the development of RAF Uxbridge, an improved public transport interchange, and fast Underground links into central London. Development in Uxbridge and the Heathrow Opportunity Area have led by example in setting standards for new quality development that meets the challenges of climate change. Local centres in the north of the borough continue to flourish as a result of improved community infrastructure.

Improved accessibility to local jobs, housing and facilities is improving the quality of life of residents: More residents are enjoying the benefits of an improved quality of life. There is a wider choice of housing, and workplaces are located where they are accessible by a range of transport options and neighbourhoods that lack adequate facilities and services have been addressed. Low emissions strategies are helping to improve air quality with associated health benefits.

Hillingdon has a reliable network of north/south public transport routes and improved public transport interchanges: Previously poor north south public transport access in the borough has been addressed. New services link Heathrow and the Hayes/West Drayton Corridor through Uxbridge to Northwood, Ruislip, Eastcote and Harefield. Improved public transport interchanges have been created at Heathrow, Hayes, West Drayton, Uxbridge and West Ruislip and more people are using public transport, reducing the dependence on cars which has eased congestion throughout the borough. As a whole the borough is benefiting from Crossrail.

Hillingdon has continued to prosper from the presence of Heathrow: The economic benefits of Heathrow Airport are being harnessed by local people through access to jobs and links to training to create greater prosperity, whilst securing improved local air quality, reductions in noise and other benefits to the environment for the local communities".

The Strategic Objectives to deliver The Vision include:

SO6: Promote social inclusion through equality of opportunity and equality of access to social, educational, health, employment, recreational, green space and cultural facilities for all in the borough, particularly for residents living in areas of identified need.

SO16: Manage appropriate growth, viability and regeneration of town and neighbourhood centres.

Policy NPPF1 relates to "National Planning Policy Framework - Presumption in Favour of Sustainable Development When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with

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applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether: Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or Specific policies in that Framework indicate that development should be restricted

Policy BE1 relates to 'Built Environment' and states "*The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:*

1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;
2. Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;
3. Be designed to include "Lifetime Homes" principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives;
4. In the case of 10 dwellings or over, achieve a satisfactory assessment rating in terms of the latest Building for Life standards (as amended or replaced from time to time);
5. Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance;
6. Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;
7. Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;
8. Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals;

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9. Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas;
10. Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document (LDD). All developments should be designed to make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill;
11. In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape. Support will be given for proposals that are consistent with local strategies, guidelines, supplementary planning documents and Hillingdon Local Plan: Part 2- Development Management Policies".

Policy EM1 relates to 'Climate Change Adaptation and Mitigation'

*The Council will ensure that climate change mitigation is addressed at every stage of the development process by:*

1. Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport.
2. Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency.
3. Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market.
4. Working with developers of major schemes to identify the opportunities to help provide efficiency initiatives that can benefit the existing building stock.
5. Promoting the use of decentralised energy within large scale development whilst improving local air quality levels.
6. Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions.
7. Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation as part of their proposals.

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8. Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.
9. Promoting new development to contribute to the upgrading of existing housing stock where appropriate. The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:
10. Locating and designing development to minimise the probability and impacts of flooding.
11. Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.
12. Giving preference to development of previously developed land to avoid the loss of further green areas.
13. Promoting the use of living walls and roofs, alongside sustainable forms of drainage to manage surface water run-off and increase the amount of carbon sinks
14. Promoting the inclusion of passive design measures to reduce the impacts of urban heat effects.

Policy C11 relates to 'Community Infrastructure Provision' states "The Council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations by: 1. Resisting of the loss of community facilities, and where the loss of these facilities is justified it will seek to ensure that resulting development compensates these uses to ensure no net loss;

2. Supporting the retention and enhancement of existing community facilities; 3. Supporting extensions to existing schools and the development of new schools and youth facilities; 4. Encouraging the development of multi-purpose facilities that can provide a range of services and facilities to the community at one accessible location;
5. Promoting innovation in service provision and recognising that there are a range of modes appropriate for providing for all sections of the community;
6. Requiring development to contribute towards the provision of community facilities to meet the needs of new communities and mitigate impacts on existing communities;
7. Locating libraries, health facilities, police facilities, leisure facilities and community centres in town centres or other accessible locations to maximise community access, sustainable transport and build a sense of local community identity;
8. Ensuring new facilities demonstrate how they will tackle climate change, in line with Policy EM1;
9. Providing facilities and services that are accessible and inclusive to all potential users regardless of age, ability, gender or socio-economic status; and
10. Implementing a borough-wide Community Infrastructure Levy (CIL) to fund community infrastructure provision".

### **Local Plan Part 2 - Development Management Policies, Site Allocations and Designations and the Policies Map**

The Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations and the Policies Map. Once adopted, it will deliver the detail of the strategic policies set out in the Local Plan Part 1.

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Policy DMHB 11 states that all development will be required to be designed to the highest quality standards and incorporate principles of good design including: harmonising with the local context by taking into account the surrounding scale of development, considering the height, mass and bulk of adjacent structures; local topography, views both from and to the site; impact on neighbouring open spaces and their environment; and ensuring the use of high quality building materials and finishes.

Policy DMHB 12 states that development should be well integrated with the surrounding area. It should:

- i) improve legibility and promote routes and wayfinding between the development and local amenities;
- ii) ensure public realm design takes account of the established townscape character and quality of the surrounding area;
- iii) include landscaping treatment that is suitable for the location, serves a purpose, contributes to local green infrastructure, the appearance of the area and ease of movement through the space;
- iv) provide safe and direct pedestrian and cycle movement through the space;
- v) incorporate appropriate and robust hard landscaping, using good quality materials, undertaken to a high standard;
- vi) where appropriate, include the installation of public art; and
- vii) deliver proposals which incorporate the principles of inclusive design. Proposals for gated developments will be resisted.

Policy DMHB21 relates to 'Telecommunications' and states:

"Telecommunication development will only be permitted where:

- i) *it is sited and designed to minimise their visual impact;*
- ii) *it does not have a detrimental effect on the visual amenity, character or appearance of the building or the local area;*
- iii) *it has been demonstrated that there is no possibility for use of alternative sites, mast sharing and the use of existing buildings;*
- v) *there is no adverse impact on areas of ecological interest, areas of landscape importance, archaeological sites, Conservation Areas or buildings of architectural or historic interest; and*
- vi) *it includes a Declaration of Conformity with the International Commission on Non Ionizing Radiation."*

The clear public benefits of high-quality communications infrastructure and the contribution they make to sustainable development are well recognised, as set out in NPPF. Accordingly, the proposal for the upgrade of the existing telecommunications base station site is in accordance with Policy SI 6 of the London Plan and DMHB21 of LP2.

The growth of digital connectivity over the last few decades has transformed all aspects of life within the UK. It has provided the opportunity to work differently, to socialise and interact

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differently, to bring the world closer and to offer new commercial opportunities. The internet and mobile connectivity rely upon the deployment of new fibre networks. Utilising these fibre networks allows each mobile base station to link back into the wider core network, however, the requirements in the future are for ubiquitous coverage and this will mean the more complex, more remote locations throughout the country will need further new installations. In addition, 5G offers download speeds far in excess of what can be achieved today, even by fixed line broadband. Such increased speeds and low latency provides the potential for far greater opportunities.

### **Hillingdon Council Strategy 2022-2026**

The Hillingdon Council Strategy 2022-2026 presents a four year strategy for the Council with clear commitments to put local residents first. It was agreed on 17<sup>th</sup> November 2022.

One of the main themes of the Strategy is to improve, strengthen and utilise digital connectivity in the borough. In order to achieve a thriving economy, the Strategy states that the Council will “*strengthen the digital infrastructure in the borough*”, and in order to ensure that local residents live healthy, active and independent lives, the Council will “*improve digital access for all*”.

Hillingdon also aspire to have a “*digital enabled, modern, well-run council*”, where technology will be embraced to be efficient and make it easier for residents to use council services.

### **Relevant Government Reports relating to Telecommunications Development**

#### **Levelling Up the United Kingdom (February 2022)**

Digital Connectivity is a focus area and the mission is ‘By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population’. This mission is focused on improving digital connectivity.

#### Digital connectivity: The case for action

The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation. Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working. However, there are significant spatial disparities in the quality of broadband and mobile networks, with rural areas likely to experience worse digital connectivity than urban areas. Infrastructure is only part of the picture: economic benefits will only materialise if businesses and workers have the skills to take advantage of improved infrastructure.

More broadly, high quality digital infrastructure can deepen local labour markets through remote working, making it more attractive for both workers and companies to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive

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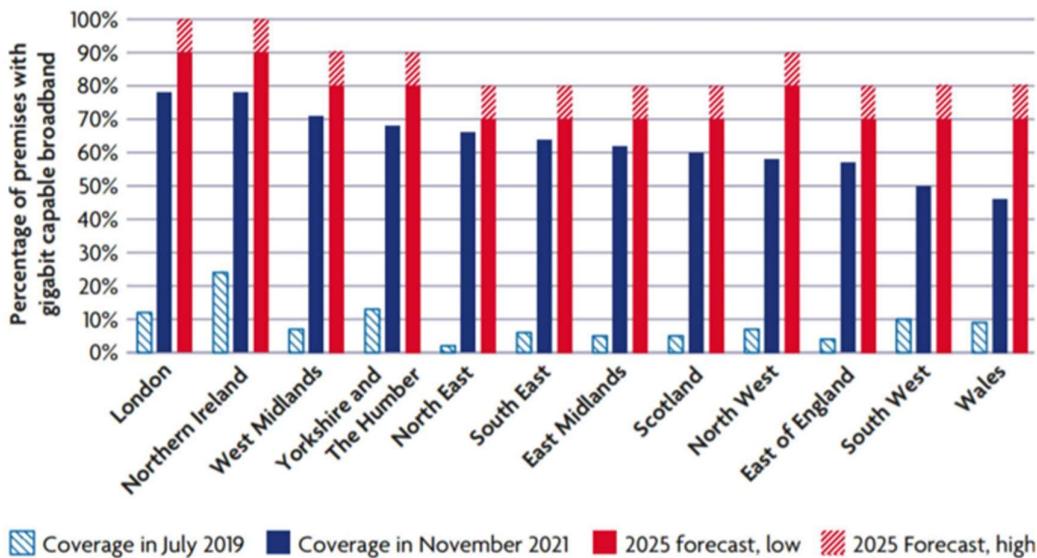
growth and jobs in new areas. Existing specialisms in the UK regions have the potential to generate strong tech clusters, such as fintech in Scotland and Wales, e-Commerce in the North West and Northern Ireland, and Agri-Tech in Yorkshire and the Humber. The sector also provides opportunities for raising living standards – median earnings for the sector are 50% higher than the UK average.

#### The policy programme

In 2020, the UK Government published the National Infrastructure Strategy, committing to providing £5bn in public funding to roll out gigabit broadband to at least 85% of the country by 2025, and subsequently to as close to 100% as possible, working with the private sector.

Public investment will target premises that are hardest to reach and which would otherwise not be provided for by the private sector, ensuring no areas are left behind. Gigabit coverage has increased from 10% to over 60% in less than two years. Since 2019, coverage has improved across the UK, and the UK Government anticipates the following additional improvements to be delivered as a minimum by 2025, as set out below.

**Figure 3.1 Gigabit coverage improvements, UK countries and regions, 2019, 2021 and 2025 (forecast)**



**Image 4: Source: Levelling Up the United Kingdom.**

#### **Online Nation 2022**

Online Nation is an annual research report, published for the first time in 2019. Using research produced by Ofcom and others, it looks at what people in the UK are doing online, how they are served by online content providers and platforms, and their attitudes to and experiences of using the internet.

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The latest Online Nation 2022 report (published June 2022) found that for most people in the UK, being online is a major part of daily life. Being online allows people to connect with others, sometimes in ways they may not be able to do offline. Data shows how we benefit from a range of online services, from messaging and calling platforms to gaming platforms, online news outlets and online shopping.

The Meta-Owned social media apps (Facebook, Instagram, WhatsApp and Facebook Messenger) made up the top four smartphone apps most visited daily by UK adults in September 2021. The top-reaching smartphone app was WhatsApp (88% of UK online smartphone using adults) closely followed by the Facebook app (87%).

94% of UK adult internet users aged 16+ said they used an online communications service for making voice/video calls or sending messages in 2021, and 80% of children aged 3-15 did the same.

The 2022 report found that the UK adult internet users spent almost 4 hours online a day in September 2021, with 3 of those hours being spent on smartphones. One in five people only use a smartphone to go online compared to one in ten last year. News and government public services are among the most-visited websites and apps in the UK.

The majority (67%) of UK internet users aged 13+ feel that the benefits of being online outweigh the risks. 43% agree that being online has an overall positive impact on their mental health.

The report found that 60% of children aged 8-15 say that using social media and messaging platforms makes them feel closer to their friends. More than three-quarters of children aged 12-15 said that being online can help with their school/homework, whilst half said it can be used to learn a new skill.

The Online Nation 2022 report acknowledged that the global pandemic since March 2020 has resulted in significant changes in online behaviour. Online shopping habits developed during the lockdown periods have remained. The largest online platforms' revenues and profits increased significantly during the lockdown periods and this growth continued in 2021. The growth is being driven by UK consumers' increased spend on e-commerce and entertainment subscription services, while advertising revenues are also increasing with the continuing brand migration to online.

Figure 1.2 of the Online Nation 2022 report indicates that the percentage of UK online adults accessing the internet, by device, in 2021 was the highest by smartphone at 88%. In September 2021 73% of the time spent online by UK adults per day was on a smartphone.

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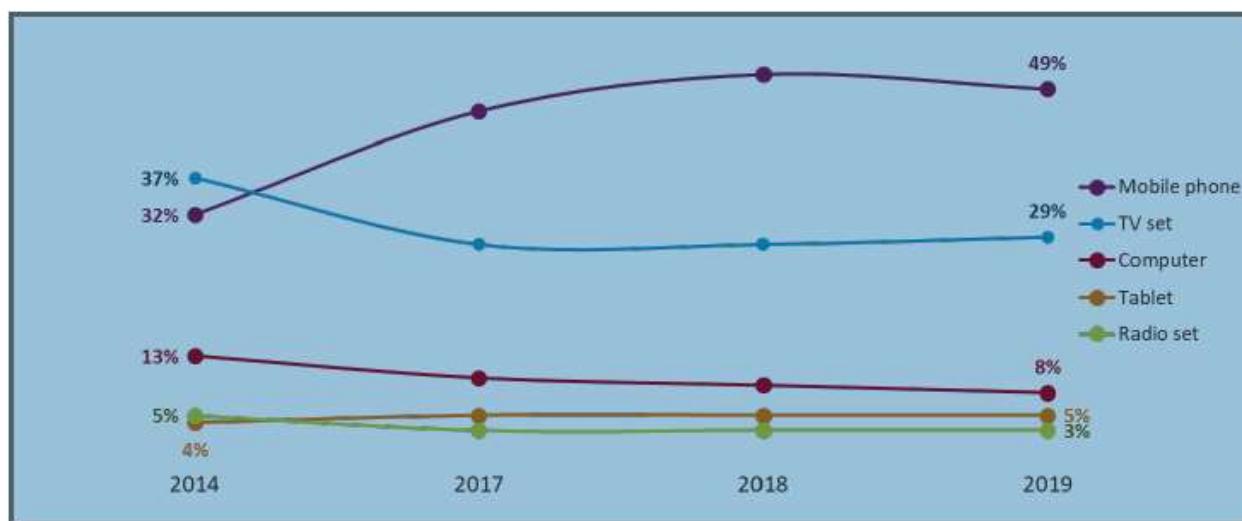
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Percentage of adult internet users	Smartphone	Tablet	Laptop	Smartphone only
2021	88%	43%	53%	21%

Source: Ofcom Adults' Media Literacy Tracker 2021: Core survey and CATI omnibus survey. IN1. Which of these devices do you use to go online? (MULTI CODE) Base: All adults 16+ that go online (at home or elsewhere) (excluding those who did not give a response at the postal survey) (3577)

**Image 5: Percentage of UK online adults accessing the internet, by device: 2021** Source: Reproduced from Online Nation 2022 Report

The table below (Image 8) indicates the most-missed device among adults were it be taken away from them, using data collected 2014-2019. As can be seen, nearly half of all adults say that their mobile device is the device they would miss the most were it taken away from them.



**Image 6: Source: Ofcom Adults' Media Literacy Tracker 2014-2019**

More people than ever now rely on their mobile phones for day to day, and even hour to hour, access to services. For example, some people use their mobile phones to monitor their health, such as diabetics. Mobile phones can be a lifesaver in that sense, just as much as being able to call 999 in an emergency.

### Ofcom Connected Nations 2022

The OFCOM Connected Nations 2022 – England Report acknowledges that in England 4G geographic coverage is currently at 92-94% and the UK geographic coverage is just 80-87%. In order to improve these rates, adequate infrastructure will be required.

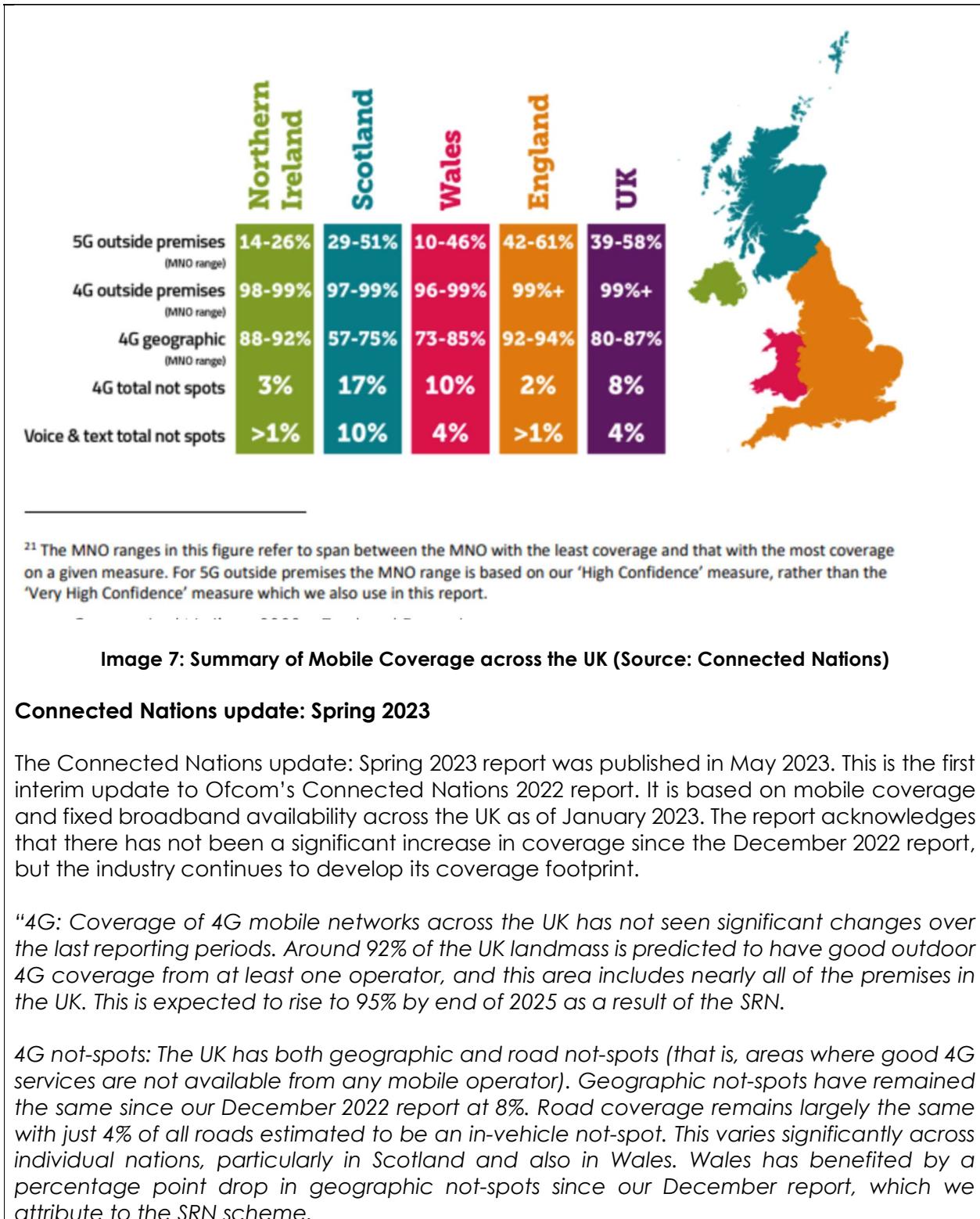
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**Calls and text coverage:** As with 4G, predicted coverage for calls and text services remains largely unchanged over the previous reporting periods. The range of predicted coverage by MNOs varies from 85-93% of the UK landmass, depending upon operator. In addition, 99% of all UK premises are predicted to have coverage for outdoor voice calls from all MNOs.

**Calls/text not-spots:** Areas where people are unable to make a call or send a text from any operator (not-spots) is similarly unchanged, with around 4% of the UK geography estimated as a not-spot, and around 2% of the UK's roads estimated to be a not-spot for calls and texts made or received in vehicle. As with 4G, there are marked variations for individual nations; for example, geographic not-spots across Scotland remain higher than for the rest of the UK, at around 10%."

### **Connected Nations update: Summer 2023**

The Connected Nations update: Summer 2023 report was published in September 2023, and is the second interim update to the December 2022 annual Connected Nations report. It is based on mobile coverage and fixed broadband availability across the UK as of April and May 2023.

The report found that mobile coverage remains stable for 4G, with around 93% of the UK landmass predicted to have good outdoor 4G coverage from at least one operator. In terms of geographical coverage, the coverage range across MNOs currently sits at 92-95% in England, which is a 1% increase since May 2022. However, across the UK as a whole, it is currently only at 80-87% - still some way off the Government target of 95% geographical coverage for the UK by 2025.

#### **4G coverage**

Premises (outdoor) – coverage range across MNOs	May 2022	September 2022	January 2023	April 2023
UK	99-c.100%	99-c.100%	99-c.100%	99-c.100%
England	99-c.100%	99-c.100%	99-c.100%	99-c.100%
Northern Ireland	97-99%	98-99%	97-99%	98-99%
Scotland	97-99%	97-99%	97-99%	98-c.100%
Wales	96-99%	96-99%	96-99%	96-99%

Geographic area – coverage range across MNOs	May 2022	September 2022	January 2023	April 2023
UK	79-87%	80-87%	80-87%	80-87%
England	92-94%	92-94%	92-94%	92-95%
Northern Ireland	88-92%	88-92%	88-92%	88-92%
Scotland	57-74%	57-75%	57-75%	58-76%
Wales	72-85%	73-85%	74-85%	74-85%

**Image 8: 4G coverage statistics (Source: Connected Nations update: Summer 2023 report)**

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The report also states:

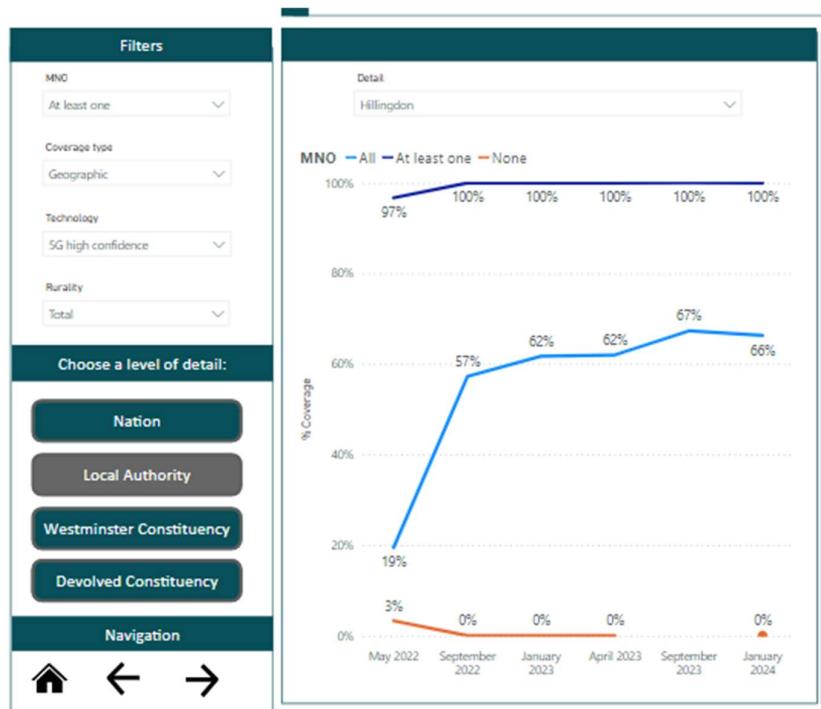
"The UK Government targets for mobile include a target of 95% UK geographic coverage for 4G, and in April 2023 it published the Wireless Infrastructure Strategy where it announced a new ambition for the UK to have nationwide coverage of standalone 5G to all populated areas by 2030."

### Connected Nations Update: Spring 2024

The Spring 2024 update of the Connected Nations report has found that mobile coverage has remained stable for 4G, with around 93% of the UK landmass predicted to have good outdoor 4G coverage from at least one operator. This area includes nearly all the premises in the UK.

For 5G, this has also remained steady, with around 92% of premises being able to get a 5G signal outdoors from at least one mobile network operator.

The Spring 2024 update introduces an interactive report with both the latest and historical data available. This report shows that in Hillingdon, only 66% of the area has 5G from all 4 operators. This restricts the choice of consumers when they are considering which mobile network operator to go with.



**Image 9: 5G coverage statistics in Hillingdon (Source: Connected Nations update: Spring 2024 report)**

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## UK Wireless Infrastructure Strategy: April 2023

The UK Wireless Infrastructure Strategy was issued by the Government in April 2023, and sets out how the Government will delivery world-class digital infrastructure to all Britons over the next decade.

In the foreword by the Secretary of State for Science, Innovation and Technology, Michelle Donelan, it is stated:

*“...wireless technology has transformed our world almost beyond recognition. Today, radio waves connect communities across the country not just with one another, but with the world thousands of miles beyond our shores, and the satellites hundreds of miles above our skies.*

*Connectivity has brought benefits for British household and British business, boosting growth, productivity, and opportunity for all. And change shows no sign of stopping...*

*...It is my personal mission as the Department's first Secretary of State to put Britain right at the forefront of scientific and technological progress. By bringing together world-class research and a dynamic business ecosystem, we can harness enterprise and innovation to grow the economy, driving forward the delivery of one of the Prime Minister's five priorities.*

*To do all this, we need world-class digital infrastructure... we have redoubled our efforts to build gigabit broadband in remote regions like Cornwall or Cumbria, together with our work to extend 4G coverage across the country through the £1 billion Shared Rural Network.*

*...Government will lead by example, putting wireless connectivity right at the heart of new and existing infrastructure to ensure that we do build infrastructure fit for the digital age...*

*...We will strengthen the infrastructure that underpins these markets, too, by managing the spectrum for the benefit of all, driving forward the rapid deployment of mobile networks..."*

The Minister for State for Digital Infrastructure, Julia Lopez, also highlights the importance of connectivity in her foreword to the UK Wireless Infrastructure Strategy:

*“The more our lives are conducted online, the more access to the internet becomes critical for social and economic opportunity.*

*This is why delivering world-class digital infrastructure to all Britons is a fundamental mission of this government – and our efforts to build it the modern equivalent in scale and ambition to the Victorian's construction of the railways. Our plan is for every corner of our country to get lightning fast connectivity, not only to give people real choices about where to live and work today but so they will not be left out of future technological revolutions because of poor infrastructure.*

*...the time is right to turn our sights to mobile connectivity, where the same sense of mission is needed to deliver the kind of wireless infrastructure that will transform how we live our lives*

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Registered Address:

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

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

and run our economy. This is not simply a matter of improving download speeds as people browse the internet on their phones or dial into work calls. It is far more transformative than that.

*...Falling behind in coverage will mean falling behind in international competitiveness when it comes to the technologies of tomorrow, and failing to provide British people with innovative, life-enhancing services on secure, resilient networks."*

The Executive Summary sets out the prime minister's five priorities for this Government:

*"...to build a better, more secure, more prosperous future for the UK, including growing the economy, and creating better-paid jobs and opportunity right across the country, which this strategy is focused on delivering.*

We can only deliver on that priority with world-class digital infrastructure. Advanced wireless connectivity will be the foundation on which we build industries, jobs, skills and services for the future, and this strategy sets out our plan to harness its potential for our economy and our society.

*The next decade will see seismic changes both in terms of what wireless connectivity can deliver and how we can use it. The economic and social benefits from these changes promise to be vast, from supercharging growth to accelerating our transition to net zero. But we can only realise these benefits with concerted action from government, industry, and others. This strategy sets out our plan to do just that..."*

The Executive Summary goes on to highlight that the UK Government is supporting the rural areas of the UK "through our £1bn deal with the mobile network operators, we are supporting rural communities by ensuring that 95% of the UK landmass have 4G coverage by 2025. This currently stands at 92%."

The Strategy indicates why the Government that already has a high bar of digital connectivity, aspires to set it even higher. It notes that 2G and 3G mobile networks opened up a new realm of connectivity and mobile communication, but these legacy technologies are being phased out over the course of the next decade to free up spectrum for next generation networks and remove barriers to new companies entering the telecoms supply chain.

The Strategy goes on to acknowledge that:

*"4G revolutionised the way people use their mobile phones, supporting access to bandwidth hungry content on platforms like YouTube. Today, a 4G mobile phone can process data four times as fast as a 2G equivalent at the turn of the millennium.*

*By building world-class, secure digital infrastructure networks, we can realise the vision we set out in our Digital Strategy for a competitive and innovative digital economy, support our vision*

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for new technologies like that set out in the AI Regulation White Paper and deliver on our commitment to grow the economy.

...By ensuring that everyone can access the technology they need, including through specific support for rural economies by enabling applications such as agritech, we can make it as easy to start and scale up a digital business in rural Yorkshire as it is in central London."

The strategy sets out how the UK will maximise the potential of advanced wireless networks over the next decade, securing international competitiveness for the future and driving economic growth across the UK. This includes:

*"Ensuring good connectivity for all – 4G will continue to play an important role over the next decade in providing mobile connectivity across the UK. Through the Government's £1 billion Shared Rural Network programme it is moving further and faster to push 4G coverage to 95% of the UK's landmass."*

To drive good connectivity for all the Government is taking action on reporting. It has asked Ofcom to continue to hold the mobile network operators to account through on-the-ground signal testing and to improve the accuracy of its coverage reporting through increased use of crowdsourced data. It has also asked Ofcom to consider how it can improve the accuracy of reporting of network performance levels in rural areas and for indoor coverage, to help policy makers and industry understand where coverage improvements are needed.

The Government wants rural economies to benefit from the huge benefits connectivity offers. As a result, the Government will be appointing a Rural Connectivity Champion to report to DSIT and DEFRA Secretaries of State to remove local barriers for deployment and promote digitally based innovation in rural areas.

Chapter 2 of the UK Wireless Infrastructure Strategy relates to ensuring good connectivity across rural and urban areas. It states that:

*"The government's priority to build a better, more secure, more prosperous future for the UK includes a clear commitment to grow the economy, and create better paid jobs and opportunity right across the country. To do this, it is vital that people who live and work in all parts of the UK, including in rural areas, have access to good quality mobile and broadband coverage."*

The Government seeks to support rural communities by ensuring that 95% of the UK landmass has 4G coverage by 2025. Currently 92% of the UK landmass is covered by a good 4G signal from at least one Mobile Network Operator, while 70% of the country is covered by all four operators.

The Government has a plan for rural connectivity which includes investing £1bn in the SRN programme to deliver 4G coverage to 95% of the UK landmass:

*"This will also deliver 4G coverage on a further 16,000km of roads, with further indirect improvements over time, including a boost to 'in-car' coverage on around 45,000km of roads*

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and we improve geographic coverage to 79% of Areas of Natural Beauty, benefitting millions of visitors every year."

The Government has also asked Ofcom to improve mobile coverage reporting, including in rural areas.

The strategy acknowledges that wireless connectivity can play a crucial role in delivering fixed broadband to the hardest to reach areas of the country. It goes on to note that world-class digital infrastructure underpins the digital economy and was worth £143 billion in 2021, accounting for 5% of the national workforce. This infrastructure provides the backbone of the UK economy and society with ever more jobs, public services and societal interactions built upon its foundations. As growth in the digital sector is nearly six times faster than across the economy as a whole, its importance will only continue to increase as the Prime Minister's priority to grow the economy is delivered. 4G technology revolutionised the way people use their mobile phones. We have all seen the growth of streaming services, like Netflix and Spotify, and gained constant access to high quality, user-produced content for free on platforms such as YouTube, transformed the way we shop online, travel around cities access to apps like Uber and use public services such as booking NHS appointments through apps. According to Ofcom's Communications Market Report, there are already close to 100 million mobile subscriptions in the UK, and a significant and growing number of machine-to-machine subscriptions.

### Planning Issues

The main issues arising from this prior approval notification are whether the upgraded monopole, due to its siting and appearance, would result in harm and, if so, whether any perceived harm would be outweighed by the significant social and economic benefits associated with the improvement of existing service and introduction of 5G provision attributed to the proposal to enable sustainable development and growth across the district and meeting the needs of its communities.

The provisions of the GPDO require the local planning authority to assess the proposed development solely on its **siting and appearance**.

The principle of development has been established by the Government when the new permitted development rights came into force in November 2016 and again in April 2022, which enables sites such as this one to be built, with prior approval for siting and appearance being the only matters that the local planning authority can take into consideration.

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

*'The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established (emphasis added). Where no specific procedure is provided in the*

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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 and Appearance**

The principle of siting a base station has already been accepted by the Council a number of years ago in this location. The proposed minor amendments to the existing base station are in full accordance with the NPPF, London Plan and the Local Plan. The changes to the existing base station will ensure that 4G and 5G services are improved without an additional installation in this part of Ickenham, maximising the use of existing facilities. The Local Plan has a presumption in favour of sustainable development and the proposed amendments fully comply with this policy aspiration.

The proposed amendments have been fully considered. To this end, the height and width of the telecommunications site will increase. The increased height is required to ensure that adequate 5G coverage can be provided to the target coverage area, and the new headframe is required to hold the amount and weight of the antennas. The site is shared by a number of mobile network operators, which is in full accordance with NPPF, in order to minimise the amount of sites and reduce proliferation. The upgrade of the existing site minimises visual amenity in line with the NPPF and will not detrimentally affect the character of the area.

### **Lack of Coverage – Material Consideration**

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 upgraded radio base station the operator's customers would not be able to access the 5G network, and due to lack of capacity as the number of users increase, would experience increasing numbers of dropped calls and buffering, leaving them unable to access the internet on their handheld devices.

### **Economic and Social Benefits**

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When telecommunications proposals are considered, it is necessary to carry out the balancing exercise weighing the need for development and the magnitude of public benefits of the proposed base station against the perceived concerns about the development's visual impact and availability of alternative locations and the possibility to design the scheme differently without impacting the operational needs of the operators.

The NPPF strongly supports sustainable development, as does the Council's Local Plan. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, participate in social media, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. Residents and businesses will enjoy better accessibility, assisting home-base working by improving the electronic means of communication and the roll-out of high-speed broadband helping to promote live-work development. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with NPPF and the Council's Local Plan, to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Enhancing the 2G/4G coverage and capacity in this area and providing 5G services will fully meet this national policy objective.

Mobile connectivity is essential to the future success of the economy. Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

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'.*

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The social and economic benefits are a significant material consideration which should be weighed against the visual impact associated with a radio base station in this location. HM Treasury outlined such benefits in its report 'Fixing the Foundations: Creating a More Prosperous Nation' – July 2015. Paragraph 7.1 of the plan stated that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

Paragraph 7.2 goes on to highlight strong support for high quality communications infrastructure. It states:

*'by reducing red tape and barriers to investment, the Government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The Government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published March, of near universal 4G and ultrafast broadband coverage.'*

The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where they live, work, visit and travel. That is why the Government is committed to extending mobile geographical coverage further across the UK, with continuous mobile connectivity provided to all major roads and to being a world leader in 5G.

Further to the Government's commitment to improve connectivity, new permitted development rights have come into force for telecommunication operators, designed to lift the restrictions on mobile operators such is the significance and weight the Government place upon the benefits attached to modern connectivity.

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016 ([https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-\(1\).pdf.aspx](https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-(1).pdf.aspx)). It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

*'A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global market place. Securing digital connectivity is thus critical to the UK's long term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases'*

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The Assessment goes on to note that 'Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy'. Therefore this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of maintaining and enhancing high quality 4G coverage and capacity and introducing 5G connectivity in this busy part of Ickenham where the social and economic benefits will outweigh the environmental considerations.

The Government's continued strong support for connectivity is further evidenced by the DCMS who launched their UK wide Digital Connectivity Portal on 20 December 2018. The Digital connectivity portal provides guidance for local authorities and network providers on improving connectivity in local areas. The Government wants everyone in the UK to benefit from world-class connectivity no matter where they live, work or travel. The Future Telecommunications Infrastructure Review outlines a package of measures to create the right market and policy conditions to deliver world-class connectivity for citizens and businesses. As a result, the pressure to upgrade the existing radio base station, to provide enhanced 4G as well as new 5G services for VMO2, is significant.

### **Practical Applications of 5G Connectivity as Example of Material Soci-Economic Benefit: -**

#### **Education:**

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

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

#### **Health:**

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

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

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## Summary

5G rollout has begun and VMO2 are in the process of upgrading their existing radio base stations wherever possible. As part of this continued network improvement program, there is a specific requirement to provide new 5G coverage in this area of Ickenham.

The proposed amendments to the existing Cornerstone base station are minor in nature but will enhance the customer experience for VMO2, which will utilise the Cornerstone infrastructure to ensure that the operator's customers are able to continue to utilise their handheld devices for the purposes in which they were purchased. The site is shared by a number of mobile network operators in full accordance with the local and national planning policy related to sharing sites, minimising the overall number of sites required and thus reducing proliferation of sites.

Site selection was progressed in accordance with the applicant's licence obligation, 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 continued reliable and high quality mobile broadband connections including 5G support sustainable growth meeting the needs of the population and strengthening global competitiveness. This is fully supported by the NPPF, London Plan and the Hillingdon Council Strategy. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area.

## We confirm that submitted drawings have been checked for accuracy

Name: (Agent)	Vicky Weston MSc MRTPI	Telephone:	07591 646 221
Company:	Perry Williams		
Company Address:	Dunkirk Avenue Desborough Northants NN14 6DE	Email Address:	<a href="mailto:vweston@perrywilliams.co.uk">vweston@perrywilliams.co.uk</a>
Signed:	<i>V. Weston</i>	Date:	06/09/2024
Position:	Town Planner	(on behalf of Cornerstone)	

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