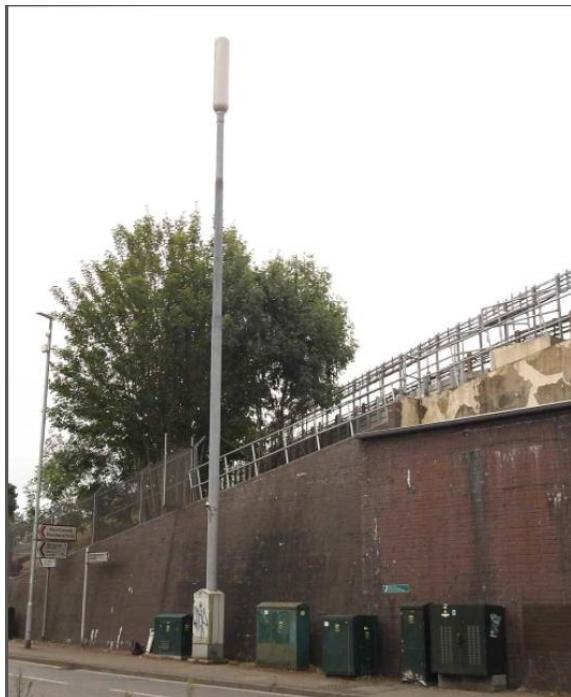


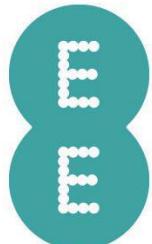


Design, Access and Supporting Statement  
in respect of  
GPDO Application  
On behalf of EE

At  
**RICKMANSWORTH ROAD  
HILLINGDON  
LONDON  
HA6 1QP (NGR E: 509661 N: 190742)**



Talent Technology Services Limited  
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Rev	Originator	Date
	Name	Day/Month/Year
1	Jamaal Hafiz	14/10/2025
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## Introduction

This Design, Access and Supporting Statement has been prepared by Telent Technology Services on behalf of EE Limited. The statement has been prepared in support of the application to replace the existing 17.64m monopole and associated antennas with a 20m monopole and associated supporting Apparatus at Rickmansworth Road, Hillingdon, London , HA6 1QP (NGR E: 509661 N: 190742).

In accordance with the Code of Best Practice on Mobile Network Development and published Government guidance, this proposal was drawn up having regard to the need for good design. This statement sets out the most relevant considerations in respect of the proposed development. This provides context for the proposal, reasoning, technical justification and planning constraints, policy guidance and alternatives.

In particular:

- Considerations of design and layout are informed by the context, having regard not just to any immediate neighbouring buildings but the townscape and landscape of the wider locality. The local pattern of streets and spaces, building traditions, materials and ecology all help to determine the character and identity of the development.
- The scale, massing and height of proposed development have been considered in relation to that of adjoining buildings; the topography, the general pattern of heights in the area; and views, vistas, and landmarks.

The following general design principles have been taken into account in respect of this proposed telecommunications development:

- A proper assessment of the character of the area concerned.
- That the design shows an appreciation of context;

## 1.0 Proposed Development

### 1.1 The Site

The removal of 1no. 17.64m monopole supporting 3no antennas and replacement with 1no. 20m-high monopole with wraparound cabinet, 9no. antennas, installation of 1no. cabinet, plus ancillary development thereto located on the footpath Pinner Road Streetworks, Pinner Road, Watford , Hertfordshire, WD19 4EA.

The application site is located on Rickmansworth Road, within the London Borough of Hillingdon, approximately at National Grid Reference E: 509661, N: 190742. The surrounding area is suburban in character, consisting mainly of residential properties with a mix of detached and semi-detached dwellings set back from the main carriageway. Rickmansworth Road (A404) is a key route connecting Northwood and Rickmansworth, characterised by a consistent flow of local traffic and a well-established public realm that includes footways, street lighting, and other roadside infrastructure.

The site itself is situated on the tarmacked footway along the northern side of Rickmansworth Road, positioned between the carriageway and the boundary of adjacent residential plots. The location is typical for highway-based infrastructure and provides a suitable and accessible setting for telecommunications equipment. The immediate streetscene includes several existing vertical elements, such as street lighting columns, road signage, and other street furniture, which together form a consistent pattern of development along the roadside. These features help to assimilate new vertical structures, such as a telecommunications pole, into the local context with limited visual intrusion.

Mature roadside vegetation and trees along sections of Rickmansworth Road contribute to the established character of the area and offer some degree of natural screening. The site benefits from good accessibility for maintenance purposes and is set within a corridor already influenced by highway and utility infrastructure.

The site is not within a Conservation Area, nor are there any listed buildings in the immediate vicinity. The character of the area is suburban and functional, with the Uxbridge Road corridor providing a suitable context for vertical street furniture and utilities infrastructure.

The proposed streetworks pole structure will be of a similar appearance to the existing street lighting columns in the area, with the presence of an existing site nearby and of these tall structures providing vertically engineered elements within the streetscene in which the proposed monopole will be viewed against, thereby not resulting in a prominent, or alien feature which would detract from the existing streetscape. Consideration is given to the existing highways infrastructure present on the around the area within the general landscape setting, all of which, provide good visual and utilitarian context against the mast which would be viewed within and not therefore considered as being visually incongruous within the surrounding residential setting.

This specific mast design is often utilised in residential areas to meet the specific visual requirements of the local area. The height of the proposal, and the overall design of the streetworks streetpole, have been kept to a minimum to ensure that any visual impact is reduced where practicable, the antennas are structurally stable, and that improved network coverage is provided to the local area. The proposed mast will not only service voice calls but will include provision for 3G and 4G. As you may be aware, EE have been awarded the contract to provide network services to the Emergency Services, and as such this site is required to provide coverage for all the blue light services.

At present, the existing site is required to be upgraded to meet the technical requirements to provide the area with improved and enhanced coverage and connectivity offering 5G to the surrounding area. In order to achieve this, a replacement monopole with a height increase will be required and the design has been carefully considered to be as minimal in terms of visual impact while achieving the technical requirements.

It is considered that the proposed development is wholly appropriate for the local area, and that the economic, environmental and social benefits which will be brought forward by the proposal will greatly outweigh any visual impact that may be caused by the upgrade of the existing base station.

## **1.2 Application History**

At present, there is an existing site located at the above address, but it cannot provide enough coverage for the general area and the Emergency Services Network. An upgrade of the existing cell site is required and will provide essential coverage to this area and support the Emergency Services Network. To upgrade by replacing the existing pole with a new pole that is sufficient to provide the required level of coverage and capacity, as previously highlighted, would result in the upgrading of what would be considered as being an established base station site in this instance.

## **1.3 The Proposal**

The proposed development consists of the installation of:

- The removal of existing 17.64m monopole supporting 3no. antennas
- The installation of a replacement 20m monopole with wrap around cabinet supporting 9no. antennas
- Installation of 1no. equipment cabinet
- Installation of 1no. GPS receiver
- Plus, ancillary development thereto

The proposed structure is to be Galvanised The ground-based equipment cabinets will be Fir Green.

The principal components of the proposed development are outlined in the Site-Specific Supplementary Information, and the general layout illustrated on the submitted drawings as part of this application.

## 1.4 Alternative Site Assessment

No alternative site assessment was conducted given this is an upgrade of an existing established radio base station whereby a telecoms base station has been already considered acceptable. If a whole new site was to be progressed this would be against the NPPF in such proliferation by where there is an opportunity to upgrade an existing site which would have significantly less impact upon the area.

Furthermore, given that this proposal will utilise an existing base station in order to minimise the spread of masts across the area, there is no need for discounted options in this instance. This is consistent with Para 18 of the Code of Best Practice for Wireless Network Development in England, which states that;

*Site sharing and use of existing infrastructure: make use of existing structures, **sites** [emphasis added] and masts possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and **sites** [emphasis added] 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.*

Such matters in relation to siting are also addressed under para 25 of the Code, whereby it again highlights the weight given to utilising existing bases station sites as follows;

*Sharing sites/masts: sharing sites should always be considered as this reduces the total number of sites/masts required for the network and also minimises the visual intrusion caused by wireless infrastructure. This may involve redeveloping an existing site, including installing a replacement mast that can accommodate additional radio equipment*

## 1.5 Local Engagement

The National Planning Policy Framework (NPPF) and the Code of Practice for Wireless Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received Green when assessed against the traffic light rating model as referenced in the Code of Practice.

In our engagement letter we sought to agree with you the appropriate traffic light rating and associated engagement requirements with the local community and obtain your comments on the siting and design of the development.

The pre-application engagement letter was issued to London Borough of Hillingdon Council 30<sup>th</sup> September 2025. This letter contained details of the proposed installation, as well as design drawings. No response has yet been received by the LPA prior to this submission.

Our best practice engagement with the local community entailed further consultation being undertaken with Ward Councillors for Hillingdon ward. No responses have been received from the other consultees until to date.

## **1.6 Additional Justification**

### **Emergency Services Network Requirement (ESN):**

In 2015, EE won the contract from UK Government to deliver a mobile network specifically for all blue-light emergency services across the country to provide a seamless 4G mobile service. The communications system will be critical in improving response times and improving communications between all of the blue-light services and providing critical infrastructure across the length and width of the United Kingdom. EE have committed to add over 500 new 4G sites to accommodate this commitment in that will eventually replace the existing Airwave TETRA radio system. This EE proposal will form part of the new 4G emergency services network and should be considered critical infrastructure within the UK to support the local community in perpetuity.

### **Shared Access – The Benefits of Mobile Technology**

Mobile phones and other similar communication devices are ubiquitous both for business and personal use. Mobile connectivity is now about fast, secure access to the internet anywhere. People and businesses are increasingly choosing to access the internet using a mobile device, and the numbers doing so are growing, as ownership of internet-enabled devices rises.

Smartphones are integral to people's lives as mobile devices supporting a growing range of functions from communication to navigation, to use as principle sources of news media, cameras, diaries and numerous other functions.

<sup>8</sup> APP/B5480/W/20/3251086 – London Borough of Havering (LPA Ref: M0008.19)

Overall, 94% of adults personally own/use a mobile phone with 52.4 million 4G mobile subscriptions. The proportion of adults in the UK with a smartphone has now reached 76% (as of 2017), with 18% of adults living in a mobile phone only home. Increasing coverage and take-up of higher speed 4G services is driving data use. The average volume of data consumed per subscriber per month is now 1.9GB.



### Economic Benefits

Modern communications in all of their different and emerging forms, including mobile communications, help maintain and stable levels of economic growth and employment. Hence, the UK Government's continued commitment to the growth and development of modern electronic communications. These benefits include:

- Improve the ability of local businesses to operate and compete effectively through access to modern communications thereby helping to maintain and increase local employment opportunities.
- The contribution to the national economy is also significant where all businesses, from large to small, benefit from modern communications that helps them maintain and attract new business and service contracts in a responsive and competitive manner.
- Improve coverage over transport and infrastructure networks which improves the ability to work on the move and improve economic efficiency



### Environmental Benefits

Modern communications, including mobile communications, provide effective protection of the environment by helping reduce the need to travel by enabling modern working practices such as greater home working. Such practices alleviate the pressure for new commercial development

such as offices, through more efficient and flexible use of existing accommodation. For the same reasons, modern communications, including mobile communications, help ensure the prudent use of natural resources.



### Social Benefits

Modern communications, including mobile communications, aid social progress, which recognises the needs of everyone. These improvements manifest themselves in a number of ways as illustrated by the following examples:

- People are now more likely to access the internet using a mobile connection than they are to have just a landline or to access the web through a fixed connection.
- Connecting to the Internet via a mobile device allows people to access a wide range of central and local government services; to do research for a school projects or apply to university; to manage their bank account and pay bills; to apply for a job; or to buy groceries.
- Most local authorities' services are now available online, and many councils have recognised the growth of smartphone use and introduced mobile phone applications to provide instant access to services, or to allow residents to report litter, dumped rubbish, pot holes and road repairs, or anti-social behaviour.
- Mobile devices enable flexible forms of working that provide opportunities to working parents or carers and help them achieve a better work life balance with both family and community benefits. By providing means of communication that improve convenience and enhance personal safety and security. This is especially important to vulnerable groups who may otherwise feel unable to participate in certain activities.

## 2.0 Planning Policy

### 2.1 National Planning Guidance

#### ***National Planning Policy Framework (NPPF 2024)***

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’ 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. In this regard the Framework can be summarised as follows:

- Government policy is to support high quality communications infrastructure and systems, as essential for sustainable economic growth;
- Government policy is to keep the inevitable environmental impact associated with electronic communications development to the minimum;
- The keyway to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites;
- Great weight should be given to conserving landscape and scenic beauty in certain specified designated landscapes, e.g., National Parks, Areas of Outstanding Natural Beauty, Conservation Areas, etc.;
- The emphasis on minimising environmental impact is greater per the sensitivity of the site. The emphasis on exploring and utilising site sharing opportunities is consequently higher in these circumstances;
- Best practice encourages a consultative approach and one that seeks to minimise potential visual impact and
- The starting point for planning new networks or the expansion of existing networks is, therefore, to use existing electronic communications sites owned by other operators or radio site management companies.

The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. This is emphasised in paragraph 10 of the NPPF, which states that in order that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. The NPPF recognises that this is especially relevant where a development might have other significantly important benefits such as being essential to meet, for example, sustainable economic growth or a national need which can include upgrading to or the provision of new infrastructure.

It is important to reflect on some key points within The Framework which are relevant to the very important development at this site and the general planning principles that should apply when determining the merits of the application:

- a. Paragraph 7 advises that the purpose of the planning system is to contribute to the achievement of sustainable development. It then states that: “At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.” [our emphasis];
- b. Paragraph 11 advises that authorities should:
  - “positively seek opportunities to meet the development needs of their area” [as part of plan making];
  - meet objectively assessed needs unless the adverse effects would “significantly and demonstrably outweigh the benefits”;

As such, development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully with all relevant Development Plan and NPPF policies and, therefore, permission should be granted for the development.

The importance of the proposed development in providing the upgrading and expansion of the existing communications network is clearly an important material planning consideration as it directly supports sustainability and is also precisely the type of new digital infrastructure that the NPPF is seeking to support. The development proposed is comparatively small scale, and has been designed in a way that is predominately consistent with the existing infrastructure setup and so should be acceptable in every respect.

However, for completeness we still highlight some of the key points within the NPPF as they help demonstrate why the application should be permitted:

Paragraph 7 advises that the purpose of the planning system is to contribute to the achievement of sustainable development. It then states that: *“At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”* [our emphasis];

Paragraph 20 advises that strategic policies should *“make sufficient provision for.....telecommunications” and that it should “be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”*

Paragraph 39, on “decision-making” states that authorities should *“work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”*.

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 81 states: ‘Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider

opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation<sup>40</sup>...

Footnote 42 of the NPPF states: 'The Government's Industrial Strategy, *HM Government (2017) Industrial Strategy: Building a Britain fit for the future*', 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.

The NPPF (2024) directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

- "b) *infrastructure for transport, telecommunications (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)*"

Leading on from this, paragraph 119 states that "*Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. 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.....*". This wording echoes guidance set out in previous versions of the NPPF. However, unlike the previous version it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

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

Paragraph 123 retains the guidance set out in previous versions of the NPPF version and states that "*Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure*".

In relation to heritage assets the NPPF states:

Paragraph 202 states heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

Paragraph 203 states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- d) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- e) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- f) the desirability of new development making a positive contribution to local character and distinctiveness; and
- g) opportunities to draw on the contribution made by the historic environment to the character of a place.

Moving on from this, paragraph 208 states that '*Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal*'. This would also include, and of relevance in this instance, the fact that the site has historically seen the hosted telecommunications equipment and as such has been a long established and accepted form of development associated with the heritage asset.

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

As can be seen from the above, the NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this must include an understanding of the associated special problems and technical needs of developing and upgrading communications networks.

Public benefits are defined within the NPPF and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

## **Code of Best Practice on Mobile Network Development in England (March 2022)**

The Code of Best Practice has been fully revised in March 2022 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information superhighway no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2016).

The principal aim of this Code 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 development of such infrastructure must be achieved in a timely and efficient manner, and in a way, which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. The Code also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties. The Code also highlights 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.

The Code highlights that local planning authorities should support the deployment of digital infrastructure by:

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

The Code highlights the Government's Communications Policy and Planning Policy. It acknowledges that digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code indicates that recent changes in planning

policy [and regulation] are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed. Furthermore, Section 2 of this Code also reiterates NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth.

The Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time due to changes in technology and associated changes in demand. The Code acknowledges that all wireless network installations are principally guided by the technical need for the site and the technical constraints placed upon transmitting a signal. It then goes on to state that “the three primary technical and operational considerations for installation sites are: ensuring that wireless infrastructure provides an appropriate level of coverage over the intended geographical area; ensuring that sites have sufficient capacity to meet user demand; and, requiring a connection to the wider network ‘backhaul’.

It then goes onto state that “With the introduction of 5G, more equipment will be required to provide coverage and capacity. 5G, as well as 4G, are data-driven technologies, and high volumes of data will be transmitted between base stations and wireless devices. 5G will require a denser network of base stations than previous generations, including more fixed line fibre optic cable for reliable and high capacity backhaul. The siting of 5G installations will be more constrained and guided by these special technical and operational considerations.

Due to the scale and technological constraints of 5G equipment, in some cases previous camouflage design solutions, such as tree mast designs and concealing antennas in flagpoles, may not be practicable or suitable. In these cases, simple designs with particular attention to colouration and finishes may help reduce visual impacts on a site-specific basis”.

In acknowledging the considerations of new technology such as 5G, the revised Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity need to be enhanced in line with Government commitments and customer demand. Similarly, some new sites will be required to replace existing sites that are lost, for example, through redevelopment of an existing building. Some masts may need to be redeveloped or replaced to enable an upgrade in services to take place.

Section 5 relates to mobile connectivity in the 21st Century, explaining that mobile phones and other devices are now everywhere. Mobile connectivity is not just making calls and texts but also mobile broadband. The majority of mobile phones in the UK are Internet enabled smartphones and large numbers of people also now own tablet devices. People are increasingly choosing to access the internet using a mobile device even when they have fixed broadband connection available.

The Code acknowledges that by the second decade of the 21st Century, the greatest increase in traffic across mobile networks was in data i.e. internet use (para 5.3). Paragraph 5.4 states that in terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5% in the Gross Domestic Product per capita, while

another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade. Section 5 of the Code goes on to highlight that connectivity promotes social inclusion. In recent years, more people rely on a mobile phone than they rely on a landline. Furthermore, people on lower incomes are even more likely to live in a mobile only household, or to access the Internet using a mobile connection (para 5.5).

The Code highlights that planning authorities, and those who represent rural areas, should recognise the importance of access to reliable mobile broadband and services for those who live and work in rural communities, including coverage for the emergency services network. The benefits of high-quality wireless connectivity to the rural economy are far reaching - better wireless infrastructure will give rural communities greater choice and access to services, allow businesses to grow, and have positive impacts on healthcare, education, tourism, and remote working.

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

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

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

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

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

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

Convenient transport connections and street, rail and waterway networks that allow the efficient movement of goods and people are also vital, alongside the schools, healthcare facilities and other amenities that employees need to be healthy and productive.'

GG5 'Growing a good economy' states:

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

'... D ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth, E ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning' '... H recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success.'

The London Plan creates the strongest policies ever for Digital Connectivity.

Policy SI 6 states: A - To ensure London's global competitiveness now and in the future, development proposals should:

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

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

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

## **Additional Supplementary Guidance**

### **Connected Nations Report (2023)**

The Connected Nations 2023 was published in May 2023. This is the first interim update to their Connected Nations 2022 report. It is based on mobile coverage and fixed broadband availability across the UK as of January 2023. Ofcom is a measure mobile coverage in a way that reflects the likely experience of people using their mobile phones. The report acknowledges that there has not been a significant increase in coverage since the December 2022, but the industry continues to develop its coverage footprint.

“4G: Coverage of 4G mobile networks across the UK has not seen significant changes over the last reporting periods. Around 92% of the UK landmass is predicted to have good outdoor 4G coverage from at least one operator, and this area includes nearly all of the premises in the UK. This is expected to rise to 95% by end of 2025 as a result of the SRN.

4G not-spots: The UK has both geographic and road not-spots (that is, areas where good 4G services are not available from any mobile operator). Geographic not-spots have remained the same since our December 2022 report at 8%. Road coverage remains largely the same with just 4% of all roads estimated to be an in-vehicle not-spot. This varies significantly across individual nations, particularly in Scotland and also in Wales. Wales has benefited by a percentage point drop in geographic not spots since our December report.

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

Calls/text not-spots: Areas where people are unable to make a call or send a text from any operator (not-spots) is similarly unchanged, with around 4% of the UK geography estimated as a not-spot, and around 2% of the UK's roads estimated to be a not-spot for calls and texts made or received in vehicle.

As with 4G, there are marked variations for individual nations; for example, geographic notspots across Scotland remain higher than for the rest of the UK, at around 10%.

5G: We continue to report on 5G coverage (outdoors premises) from ‘All MNOs’ and from ‘At least one MNO’, with coverage confidence levels ranging from high to very high. Coverage from ‘At least one MNO’ now ranges from 73% (very high confidence) to 82% (high confidence) of premises outdoors, up from 67% and 78% respectively when we reported in our December 2022 report”.

## UK Wireless Infrastructure Strategy (2023)

In April 2023, the UK Government published the ‘UK Wireless Infrastructure Strategy’], a plan for delivering world-class digital infrastructure which the government identifies as an essential enabler for its 5 priorities of building a better, more secure, more prosperous future for the UK, including growing the economy, and creating better- paid jobs and opportunity right across the country. In her foreword, the Rt Hon Michelle Donelan MP, Secretary of State for Department for Science, Innovation and Technology, provides context for the strategy:

“5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone 5G will drive growth in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world.

Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. 5G can improve our public services, too, in everything from education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis.... This is an incredible opportunity; widespread adoption of 5G could see £159 billion in productivity benefits by 2035”.

The Future Telecoms Infrastructure Review, 2018 sets out the ambition of the Government for the UK to become a world leader in 5G technology and ensuring world class connectivity for all. This ambition was reaffirmed in the ‘UK Wireless Infrastructure Strategy’, published in April 2023 which states in the Executive Summary:

“The next decade will see seismic changes both in terms of what wireless connectivity can deliver and how we can use it. The economic and social benefits from these changes promise to be vast, from supercharging growth to accelerating our transition to net zero. But these benefits can only be achieved with concerted action from government, industry, and others”.

The Foreword of the ‘UK Wireless Infrastructure Strategy’ by Julia Lopez MP ‘Minister of State for Department for Science, Innovation and Technology’ states inter-alia:

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

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

It is this sense of purpose that underpins Project Gigabit, our flagship £5 billion programme to reach hard-to-reach communities across the UK with gigabit-capable broadband. It is complemented by a staggering competition now underway between commercial suppliers to supply Britons with great connectivity.

Extraordinary progress is being made on coverage. When I began my role in September 2021, gigabit coverage was just over 50%. Now, it stands at almost 75%.

With £1bn of Project Gigabit's funding now available to suppliers, our contracts are not just delivering better internet but skilled jobs everywhere from Blandford to Berwick. By the end of next year, we hope to have every part of our country under contract.

Which is why the time is right to turn our sights to mobile connectivity, where the same sense of mission is needed to deliver the kind of wireless infrastructure that will transform how we live our lives and run our economy. This is not simply a matter of improving download speeds as people browse the internet on their phones or dial into work calls. It is far more transformative than that'.

The UK Wireless Strategy states that '4G technology revolutionised the way people use their mobile phones. What today is considered normal, a decade ago was ground-breaking. We have seen the growth of streaming services, like Netflix and Spotify, and gained constant access to high-quality, user-produced content for free on platforms like YouTube, transformed the way we shop online, travel around cities through access to apps like Uber and Bolt and use public services, such as booking NHS appointments through apps'.

The UK Government in the UK Wireless Infrastructure Strategy' recognises that 'growth in the digital sector is nearly 6 times faster than across the economy is a whole.

### **Levelling Up the United Kingdom White Paper'**

The Department for Levelling Up, Housing and Communities (DLUHC) published the 'Levelling Up the United Kingdom White Paper' on 02 February 2022. Levelling up is a moral, social and economic programme for the whole of government. The Levelling Up White Paper sets out how the Government spread opportunity more equally across the UK.

The 'Levelling Up the United Kingdom White Paper' champions that 'the United Kingdom is an unparalleled success story – a multi-cultural, multi-national, multi-ethnic state with the world's best broadcaster; a vibrantly creative arts sector; a National Health Service which guarantees care for every citizen; charities and voluntary groups which perform a million acts of kindness daily; globally renowned scientists extending the boundaries of knowledge every year; entrepreneurs developing the products and services which bring joy and jobs to so many; and millions of citizens whose kindness and compassion has been so powerfully displayed during the COVID-19 pandemic.

But not everyone shares equally in the UK's success. While talent is spread equally across our country, opportunity is not. Levelling up is a mission to challenge, and change, that unfairness. Levelling up means giving everyone the opportunity to flourish. It means people everywhere living longer and more fulfilling lives, and benefitting from sustained rises in living standards and well-being.

This requires us to end the geographical inequality which is such a striking feature of the UK. It needs to begin by improving economic dynamism and innovation to drive growth across the whole country, unleashing the power of the private sector to unlock jobs and opportunity for all. While there are world-leading and enterprising businesses and innovators right across the UK, economic growth and the higher productivity which drives it has been over-concentrated in specific areas, particularly the South East of England. A long tail of low-productivity businesses and places explain why UK productivity growth is too low compared to competitors. It is vital that we preserve and enhance the economic, academic and cultural success stories of the UK's most productive counties, towns and cities. But it is equally critical that we improve productivity, boost economic growth, encourage innovation, create good jobs, enhance educational attainment and renovate the social and cultural fabric of those parts of the UK that have stalled and not – so far – shared equally in our nation's success'.

The 'Levelling Up the United Kingdom White Paper' states that:

'The UK Government has made progress towards spreading opportunity around the country since 2019, alongside mitigating the worst effects of the pandemic, with: • £5bn for Project Gigabit to bring gigabit-capable broadband to 85% of the UK by 2025, and the £1bn Shared Rural Network deal with mobile operators delivering 4G coverage to 95% of the UK by the end of 2025; • five-year consolidated transport settlements amounting to £5.7bn in eight city regions outside London, £5bn of funding for buses and active travel over this Parliament; and £96bn for the Integrated Rail Plan delivering faster, more frequent and more reliable journeys across the North of England and the Midlands; Levelling up is not about making every part of the UK the same or pitting one part of the country against another. Nor does it mean dampening down the success of more prosperous areas. Indeed, by extending opportunity across the UK we can relieve pressures on public services, housing and green fields in the South East. And levelling up can improve well-being in the South East by improving productivity in the North and Midlands. So, it is about the success of the whole country: realising the potential of every place and every person across the UK, building on their unique strengths, spreading opportunities for individuals and businesses, and celebrating every single city, town and village's culture. This will make the economy stronger, more equal and more resilient, and lengthen and improve people's lives. The economic prize from levelling up is potentially enormous. If underperforming places were levelled up towards the UK average, unlocking their potential, this could boost aggregate UK GDP by tens of billions of pounds each year. Levelling up skills, health, education and wellbeing would deliver similarly-sized benefits. Accumulated over time, those gains could easily surpass annual UK GDP. Success in levelling up is about growing the economic pie, everywhere and for everyone, not re-slicing it.'

**The United Kingdom's Geographical Disparities: Drivers and Potential Policy Approaches**  
What does the economic and social geography of the United Kingdom look like? The UK has larger geographical differences than many other developed countries on multiple measures, including productivity, pay, educational attainment and health. Urban areas and coastal towns suffer disproportionately from crime, while places with particularly high levels of deprivation, such as former mining communities, outlying urban estates and seaside towns have the highest levels of community need and poor opportunities for the people who grow up there. These disparities are often larger within towns, counties or regions than between them. They are hyper-local and pockets of affluence and deprivation may exist in the same district. Indeed,

many of the worst areas of deprivation are found in the UK's most successful cities. While change is possible, in some cases, these differences have persisted for much of the last century.

And some of the UK's most successful cities – such as Birmingham, Manchester, Leeds, Glasgow and Cardiff – lag behind their international comparators when it comes to productivity and incomes. What are the current and future drivers of geographical disparities? Over the past century, many trends have combined to create the spatial patterns seen across the UK today. Globalisation, technological progress, advances in transport, logistics and power, and the shift from heavy industry to knowledge-intensive sectors, as well as the rise of foreign holidays and shift from technical training to university education, have had a large and lasting impact on the economic geography of the UK. These dynamics of the global economy have benefited the UK overall, improving productivity, increasing wealth and driving up living standards through more innovation and competition. These dynamics, however, have not had the same positive economic and social impacts across the UK. While London and much of the South East have benefited economically, former industrial centres and many coastal communities have suffered. This has left deep and lasting scars in many of these places, damaging skills, jobs, innovation, pride in place, health and wellbeing. What are the factors that will help drive levelling up? Levelling up requires a focused, long-term plan of action and a clear framework to identify and act upon the drivers of spatial disparity. Evidence from a range of disciplines tells us these drivers can be encapsulated in six “capitals”.

- Physical capital – infrastructure, machines and housing.
- Human capital – the skills, health and experience of the workforce.
- Intangible capital – innovation, ideas and patents.
- Financial capital – resources supporting the financing of companies.
- Social capital – the strength of communities, relationships and trust.
- Institutional capital – local leadership, capacity and capability

This White Paper sets out that the new policy regime is based on five mutually reinforcing pillars. Firstly, the UK Government is setting clear and ambitious medium-term missions to provide consistency and clarity over levelling up policy objectives. These missions will serve as an anchor for policy across government, as well as catalysing innovation and action by the private and civil society sectors. These missions are ambitions that the UK Government has for all parts of the UK. Delivering on them, while being fully respectful of the devolution settlements, will require close and collaborative work with the devolved administrations. The missions are rolling decade-long endeavours and will be reviewed periodically by the UK Government. One mission relates to:

“Digital Connectivity

Mission: By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population” (my emphasis).

The White Paper notes the pivotal role that ‘Digital Connectivity’ has in boosting productivity, pay, jobs, and living standards by ‘Growing the Private Sector’.

To help drive these improvements, the UK Government is setting four core missions, spanning living standards; research and development (R&D); transport infrastructure; and digital connectivity.

Para. 3.2.4 of the White Paper states 'By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population. This mission is focused on improving digital connectivity'.

The case for 'Digital Connectivity' action states:

'The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation.

Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working. However, there are significant spatial disparities in the quality of broadband and mobile networks, with rural areas likely to experience worse digital connectivity than urban areas. Infrastructure is only part of the picture: economic benefits will only materialise if businesses and workers have the skills to

take advantage of improved infrastructure.

More broadly, high quality digital infrastructure can deepen local labour markets through remote working, making it more attractive for both workers and companies to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive growth and jobs in new areas. Existing specialisms in the UK regions have the potential to generate strong tech clusters, such as fintech in Scotland and Wales, e-Commerce in the North West and Northern Ireland, and Agri-Tech in Yorkshire and the Humber. The sector also provides opportunities for raising living standards – median earnings for the sector are 50% higher than the UK average.

The policy programme for 'Digital Connectivity' states:

'In 2020, the UK Government published the National Infrastructure Strategy, committing to providing £5bn in public funding to roll out gigabit broadband to at least 85% of the country by 2025, and subsequently to as close to 100% as possible, working with the private sector. Public investment will target premises that are hardest to reach and which would otherwise not be provided for by the private sector, ensuring no areas are left behind. Gigabit coverage has increased from 10% to over 60% in less than two years. Since 2019, coverage has improved across the UK, and the UK Government anticipates the following additional improvements to be delivered as a minimum by 2025.

The UK Government has also agreed a £1bn deal with mobile operators to deliver the Shared Rural Network programme. This will see operators collectively increase 4G coverage to 95% by 2025. As a result of this collaboration, the vast majority of the UK will soon benefit from improvements to digital connectivity.

5G has the potential to radically change the way people live and make businesses more productive and competitive. The UK Government's ambition is for the majority of the population to have access to a 5G signal by 2027. Since 2017, the UK Government has

provided £200m in funding for 5G Testbeds and Trials, supporting over 200 startups and SMEs across a range of sectors – including healthcare, manufacturing, Agri-Tech and creative industries – to better understand how to use the technology to develop new solutions and services (emphasis added).

In 2022, the UK Government will publish the Wireless Infrastructure Strategy. This will review how far the private sector will go to deliver wireless infrastructure – including 5G – across the country, and determine whether there are any market failures in places that need to be addressed, and how the UK Government could tackle these.

The West Midlands 5G (WM5G) Testbed started in 2018 with the mission of testing and proving the benefits of 5G to public and private sector productivity, creating jobs and boosting growth. The UK Government has invested £21m over three years, alongside investment from local government and the private sector. By working with local authorities and Mobile Network Operators (MNOs), WM5G has accelerated 5G deployment by over six months, resulting in the West Midlands being amongst the best connected places for 5G in the UK. In addition, WM5G has delivered a number of UK firsts, including a 5G road sensor network, 5G connected ambulance and capsule endoscopy trials, and a 5G application accelerator programme called 5prinG, which has already upskilled over 400 organisations on the benefits of 5G and allowed over 60 startups to develop new 5G products and services. We must ensure that people have sufficient digital skills to reap the benefits and prosperity arising from the digital economy. In 2020, the UK Government introduced a new digital skills entitlement, giving adults with low or no digital skills in England free access to new digital skills qualifications based on employer-supported national standards. The UK Government continues to work with local leaders to develop Local Digital Skills Partnerships. These collaborative partnerships are now operating in seven regions across England, with an eighth formally launching in Hull and East Yorkshire in early March. The UK Government will work with devolved administrations to consider how best to share the insights and evaluation of the programme to help build digital skills capability across the UK’.

## **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

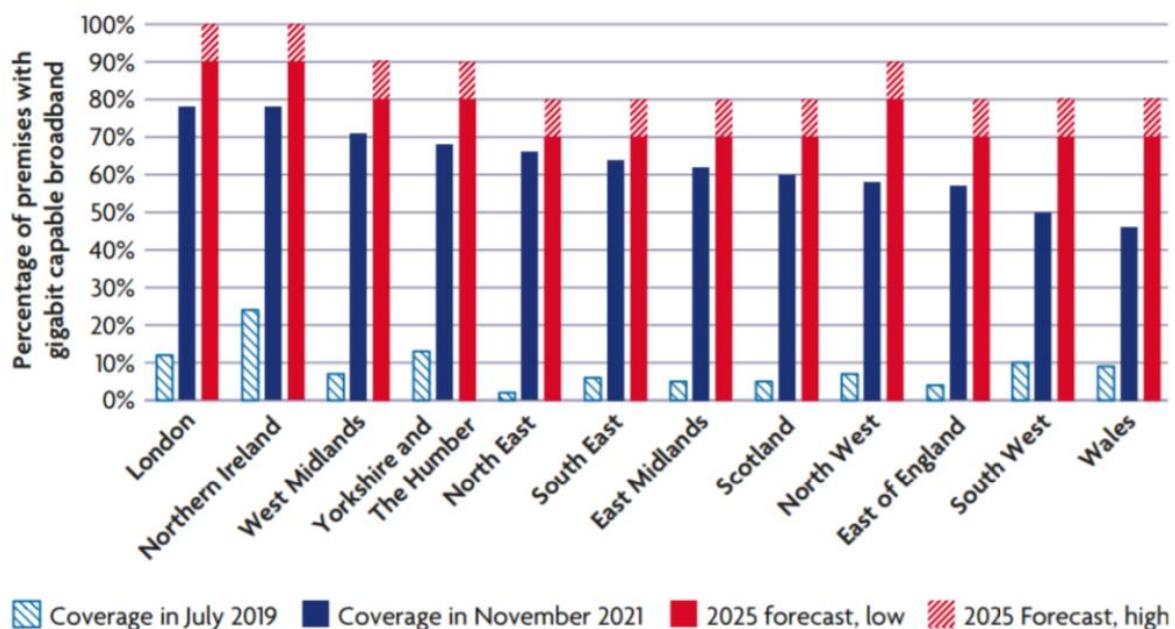
The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation. Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working. 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 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)**



Source: Levelling Up the United Kingdom.

In 2022, the UK Government will publish the Wireless Infrastructure Strategy. This will review how far the private sector will go to deliver wireless infrastructure across the country and determine whether there are any market failures in places that need to be addressed, and how the UK Government could tackle these.

We must ensure that people have sufficient digital skills to reap the benefits and prosperity arising from the digital economy. In 2020, the UK Government introduced a new digital skills entitlement, giving adults with low or no digital skills in England free access to new digital skills qualifications based on employer-supported national standards. The UK Government continues to work with local leaders to develop Local Digital Skills Partnerships. These collaborative partnerships are now operating in seven regions across England, with an eighth formally launching in Hull and East Yorkshire in early March. The UK Government will work with devolved administrations to consider how best to share the insights and evaluation of the programme to help build digital skills capability across the UK.

## 2.2 Local Planning Policies

The application in front of the Council is for prior approval. This is because the scale of the development proposed means that it benefits from permitted development rights set out in Part 16 of Schedule of the GPDO.

Described above, this is a light-touch process. The principle of development is established by the GPDO 2015 and the provisions of Schedule 2, Part 16, Class A do not require regard to be had to the development plan. With regard to the policies of the local plan and the National Planning Policy Framework (the NPPF) regard should be had to these only.

Section 70 of the Town and Country Planning Act 1990, as amended, requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.

The relevant planning policy framework taking into consideration is found principally within the following local plan and supplementary planning documents:

- The Development Plan, which in this instance comprises;
- Hillingdon Local Plan Part 1 – Strategic Policies
- Hillingdon Local Plan Part 2 – Development Management Policies (2020)
- National Planning Policy Framework (NPPF 2024)
- London Plan (2021)
- The Code of Best Practice on Mobile Network Development in England (2022)

### Adopted Hillingdon Local Plan Part 2 – Development Management Policies (2020)

There are no relevant telecommunications policies within Hillingdon Local Plan Part 1 – Strategic Policies.

The following policy is relevant:

Policy DMHB 21: Telecommunications

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) iii) it has been demonstrated that there is no possibility for use of alternative sites, mast sharing and the use of existing buildings;
- iv) 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
- v) vi) it includes a Declaration of Conformity with the International Commission on Non Ionizing Radiation.

## 2.3 Planning Assessment

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

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

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

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

As previously stated, the upgrade by way of removing the existing 17.64m pole and antenna for a 20m monopole supporting 9no. antennas is required is to ensure coverage and capacity is improved and provided within the area. The operator now required to upgrade the site for 4G and 5G technology and therefore the requirement of this prior approval application. It is acknowledged the height will increase, however, given this is the upgrading of an existing established base station by where a pole structure has already been considered acceptable in its location away from residential properties and situated along a main road, it is not believed the proposed works will be overbearing and as such any harm would be less than substantial and outweighed by the significant social and economic benefits.

Modern cities are required to provide both residents and visitors with digital connectivity to enable their day to day living and enjoy recreational activities, all of which contributes to the vitality of the city and its economic and social sustainability.

This proposal would see the upgrading of an existing telecommunications base station to deliver 4G and 5G mobile connectivity to meet the Government's Digital Strategy and to bring about the significant benefits associated with this advanced next generation mobile connectivity. As the proposal to replace the existing 17.64m pole to 20m monopole, it is considered that any impact in terms of siting would not be a consideration in this instance given the principle would not be in question given the existing use of the site in hosting telecommunications equipment. Any building or property that has a direct view of the apparatus already has visibility of the existing equipment including setting of nearby heritage assets, to which this proposal is of a similar design and height. It is therefore clear that this proposal would NOT have substantial harm in altering the existing landscape or heritage assets setting in any distinguishable manner and thus any harm would be less than substantial and significantly outweighed by the public benefits of providing the upgrade in technology this is line with Policy DMHB 21 of the Adopted Hillingdon Local Plan Part 2 – Development Management Policies.

In addition, the proposed upgrade from a 17.64m pole to a 20m monopole at this location represents a modest and proportionate enhancement of the existing telecommunications infrastructure at this site. The principle of development has already been established by the presence of the existing installation, and the proposal seeks to ensure that the site remains fit for purpose in delivering modern digital connectivity. The increase in height is essential to improve coverage and capacity in the surrounding urban area, supporting both local residents and businesses, and aligning with national and local policy objectives to expand reliable mobile and data services.

From a visual perspective, the change in scale is considered acceptable within this setting.. In the vicinity there are various vertical elements such as lampposts and the existing monopole already present in the landscape and combined with the existing semi mature trees, measuring up to approximately 10m in height, it will provide a level screening which will ensure the impact of the site has been limited. While the proposed monopole would be taller than the existing structure, its slimline design ensures that it remains relatively unobtrusive.

The scale and design of the telecommunications tower will not detract from the local character given its careful siting adjacent the mature tree rising to 10m, which will provide some level of screening or backdrop (depending on the direction of view) and provide a natural vertical context for the proposed site. This ensures impact upon the area has been minimised, so far as is practicable.

The upgrade also offers clear sustainability and efficiency benefits. By utilising the established site and its existing access arrangements, the proposal avoids the need for new land-take or the introduction of additional masts elsewhere in the urban area. This co-location and rationalisation of equipment are strongly encouraged by planning guidance, as they minimise landscape disruption and ensure that infrastructure investment is concentrated where it is most effective.

The proposed equipment is limited to the minimal operational requirement to ensure adequate capacity and connectivity. This proposal takes advantage of an existing base station to ensure that the number of masts within the Council's area are kept to a minimum. the benefits that

this proposal would bring to the wider community greatly outweigh any harm. The proposal will not harm the surrounding area; but it will provide a great service to the surrounding community whilst meeting the aims of the Governments Digital Strategy.

The proposal would also contribute to strengthening the economic vitality of the area, supporting businesses, residents, and cultural institutions. The proposal would enable better connectivity for local education and community services; Supports heritage tourism, a key contributor to the local economy, by providing seamless digital access for visitors and event organisers.

The general presumption in favour of allowing development for modern communications, and the special operational and technical factors that require siting of base stations within the setting of listed buildings, is balanced by the need to conserve or enhance their heritage qualities. As noted this is for the upgrading of an existing established radio base station.

However, there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs, the NPPF now applies a reduced policy test compared to previous guidance. This helps clarify that an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.

Nonetheless, any potential harm the apparatus would cause to the designated heritage asset must be assessed, as set out in NPPF paragraph 203 and how to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. In this case, all reasonable steps have been taken, through careful upgrading of the existing established radio base station having regard to technical and operational factors. Accordingly, the proposal looks to conserve the heritage assets and, in this instance, would, by way of siting and appearance, preserve the appearance and setting of the listed assets and be of less than substantial harm to nearby heritage assets.

In so far as there may be any perceived harm, the development proposal will have less than substantial harm to the significance of a designated heritage asset and as such, this harm has to be weighed against the public benefits of the proposal (paragraph 214). In this respect the upgrade of this base station is required as part of a national mobile communications network, necessary to extend and improve mobile connectivity to the local area and has wider public interests. As explained, the target coverage area falls within the designated area and the special operational and technical requirements necessitate siting of new apparatus within it.

As a matter of principle, the development proposed is in accordance with the relevant policy framework as well as local planning policy and should therefore be acceptable.

## Economic and Social Benefits

The NPPF strongly supports sustainable development as does the local plan. Mobile communications play 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, 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 the need to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. This fully complies with the aims of the NPPF and the Council's local plan to minimise the effects on climate change by reducing the need to travel and as a consequence the carbon footprint.

It is therefore clear that the Government places significant importance on reliable communications and as such the Planning Inspectorate gives significant weight to the public benefit arising from local service provision. The issue of benefits and planning balance is considered in Appeal Ref: APP/L1765/W/18/3197522 (Land at the junction of Andover Road and Athelsan Road, Winchester for the erection of a 17.5m street works pole).

The Inspector found at Paragraph 9 '*The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections". In this instance, the proposal is not so much seeking to provide significantly higher standards but to maintain recent local provision of 2G, 3G and 4G services as a result of a notice to quit from a nearby site that was providing these services. The Council has commented that service provision would be 'adequate' without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision'.*

In addition to the above, this issue of public benefit and planning balance was also considered in Appeal Ref: APP/X5990/W/3162918 (55-59 Oxford Street). In this case, the Inspector found at Paragraph 20 '*Whilst I have paid special attention to the desirability of preserving or enhancing the character or appearance of the conservation area, the above factors lead me to conclude that there is less than substantial harm to the character and appearance of the existing building and the SCA. Therefore, whilst there is some conflict with WCP and UDP policies, the less than substantial harm that I have identified is outweighed by the clear public benefits of the proposal in maintaining and improving vital communications infrastructure at an important location*'.

Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is also essential to fulfilling the potential of

new technologies. Innovation such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

Paragraph 39 of the NPPF (2024) 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 brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.*

Providing high quality 2G, 3G, 4G and 5G coverage and capacity within the area fully meets this aim of the NPPF. The social and economic benefits are significant material considerations which should be weighed against any visual impact associated with any mast at this location, whether a new mast or the alteration/replacement of an existing mast. In addition to the above, HM Treasury outline such benefits in its report '*Fixing the Foundations: Creating a more Prosperous Nation*' (July 2015). Paragraph 7.1 states 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 onto highlight strong support for high quality communications infrastructure. It states:

*'By reducing regulatory 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 in March, of near-universal 4G and ultrafast broadband coverage'.*

Indeed, MPs have noted in parliament that the UK's Superfast Broadband connectivity was 'relatively poor'. As such, there has been continuing and growing strong national support for a high-quality communications infrastructure that is fit for purpose and helps promote the UK as a world leader in this regard, particularly with the roll-out of 5G coverage. Further to Government's commitment to improve connectivity, on 24<sup>th</sup> November 2016 the new 'permitted development' rights for telecommunications operators came into force, designed to lift the restrictions on mobile operators such is the significance of the significant weight that Government places upon the benefits attached to modern connectivity.

In October 2016, there was also the BIG Infrastructure Group (as chaired by MP Grant Shapps) Report release calling on operators to improve their network. This is signed and has comments from numerous MPs nationally. A National Needs assessment – A Vision for UK Infrastructure was also published in October 2016. 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 sufficient digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global marketplace. 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.'*

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*'. This Assessment goes on to further explain the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of maintaining high quality 2G, 3G, 4G and 5G coverage to this busy area a short distance to the east of the capital, where the social and economic benefits significantly outweigh the environmental considerations.

Ministers from the DCMS and MHCLG wrote to all CEOs of the Council's in England (March 2019) setting out the position in respect of supporting investment in high-quality, reliable digital connectivity. The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion. Ministers state:

*'it is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. As outlined in the Future Telecoms Infrastructure Review, the Government would also like to see national full fibre coverage by 2033. We would also like the UK to be a world leader in 5G, with the majority of the population covered by a 5G signal by 2017. We are writing to ask for your help in supporting the investment necessary to achieve these objectives. Recent years have seen substantial investment in mobile and fixed digital infrastructure across the UK. While mobile coverage across the UK has been significantly improving, there are still too many areas where coverage is poor. The UK has now achieved 95% superfast broadband coverage but still only 6% full fibre coverage.'*

*We need to create the market and policy conditions to support the large-scale commercial investment required to extend and future-proof digital connectivity. A key part of this is making it easier for operators to deploy infrastructure. To help to achieve this, the Government recently reformed the Electronic Communications Code – the statutory framework which underpins agreements between communications network providers and those in both the private and public sectors who can provide sites for the installation of network equipment. The purpose of the reform was to make it easier and more cost effective for communications network providers to deploy and maintain digital infrastructure.*

*Local Authorities have an essential role to play as site providers. As Chief Executives, you can support investment in digital communications infrastructure by ensuring your organisations have policies and procedures in place that promote effective engagement with the digital communications industry and minimise barriers to deployment'*

The replacement site will continue to provide high quality 2G, 3G and 4G coverage and capacity, supporting the Government's aim to 'focus on ensuring everyone is connected to the information highway'. This fully meets the aspirations of the NPPF and the Council's strategic strategy in respect of supporting sustainable development.

### **Assessment against Policy**

In consideration of the NPPF and Policy DMHB 21 of the Adopted Hillingdon Local Plan Part 2 – Development Management Policies it is our belief that the development proposal meets the requirements of national and local policy whilst having regard to technical and operational factors and maintaining the necessary level of coverage to Hillingdon. This supporting statement has justified the need for this proposal, and the upgrade of the existing base station at Rickmansworth Road, Hillingdon, London ,HA6 1QP (NGR E: 509661 N: 190742).

The scale and design of the telecommunications pole will not detract from the local streetscape character given its careful siting with numerous vertical elements of street furniture that include lighting columns and road signage and an existing telecommunications site already considered acceptable within the area, which will provide an excellent level of providing a natural vertical context for the proposed site. We would again reiterate that we believe that we have demonstrated that the telecommunications development, having regards to the technical and operational constraints, has been designed to minimise environmental and visual impacts through careful siting and design choices in line with the NPPF and Policy DMHB 21 of the Adopted Hillingdon Local Plan Part 2 – Development Management Policies.

The proposed mast has been specifically selected for deployment due to its design and is regularly positioned within urban areas such as that of the application site. The design will be a slimline, galvanised finish, allowing the mast to assimilate with often grey sky and, compared to the alternative of installing a thicker monopole or lattice style design that would appear far more visually dominant in the street scene and would likely be perceived to be visually incongruous with their surroundings. Furthermore, the streetworks design is the safest for supporting antenna at the required height of 20m in this instance, as it is the most structurally sound design when taking into account natural forces such as wind load at this height. It is not therefore considered that the proposal would have any detrimental or demonstrable visual impact in respect of the existing streetscape to any significant degree in line with NPPF, Policy DMHB 21 of the Adopted Hillingdon Local Plan Part 2 – Development Management Policies.

The site is a an already well-established part of the area and this the proposal will enhance the existing structure to provide improve coverage rather than introducing a new installation. Hence, it is considered that the most suitable town planning and environmental solution has been brought forward. The proposal will utilise the existing mature trees to best cover, screen and provide a backdrop for the replacement monopole and associated apparatus. Therefore, it is believed that the proposed infrastructure will have little impact on any heritage assets, and, that when compared to the public benefits that will be brought forward as a consequence of this application, that any impact on the heritage asset will be balanced against these public benefits.

It is accepted that the height of the proposed installation is taller than the existing site and other pieces of surrounding structures and some vegetation, but this in itself is not a valid

reason to conclude that it is not appropriate at a specific location. Indeed, Inspectors at appeal have noted that by their very nature to be effective masts are required to be taller than surrounding structures.

Telecommunications apparatus by their very nature must be taller than surrounding built and natural form to ensure its efficient operation. The Code of Practice explains that 'radio signals operate like light and must "see" over the target coverage area...' To suggest that it is inappropriate development because it is taller than adjacent lighting columns or road signage is no more relevant than suggesting that street lighting columns are inappropriate because they are taller than road signage or traffic lights.

They are all essential pieces of infrastructure within a street scene that carry out differing functions and therefore cannot be considered on the same merits. Should a street lighting column be capable of the provision of high quality 3G/4G telecommunication services then this would be a reasonable consideration, but this is clearly not the case. As such, the proposal should not be considered negatively due to it being taller *per se* than other vertical structures. Reasonable consideration of the proposal in the context of nearby street furniture can only conclude that the presence of other vertical structures in the immediate area only seeks to provide a setting wherein a base station may appear more congruous from which to provide an important service to a wider area.

The equipment cabinets are required to support the monopoles functionality and can be added as permitted development rights under a Regulation 5 notification once the monopole has been approved however for transparency they have been included and form part of the application. Given their height under 2.5<sup>m2</sup> they will not be of detrimental impact to the area, given they will be finished in fir green.

Ultimately, this location is considered to be the optimum location for an upgraded site in terms of both technical and operational needs and minimising environmental impact, in particular landscape and visual impact. The design of the development proposed is the most environmentally sensitive available to meet the operational needs of the development and, as outlined above, will be in keeping with the character of the wider setting of the local area.

In consideration of the NPPF and the Hillingdon Local Plan it is our belief that the development proposal meets the requirements of national and local level policies whilst having regard to technical and operational factors and maintaining the necessary level of coverage to Hillingdon.

Therefore, it is our belief that the wider public benefit in this instance vastly outstrips any perceived visual intrusion and it is our belief that as such locals and associated stakeholders within the council should support this application because of the distinct lack of impact on the wider area whilst according to the policies mentioned within this document that present greater and wider opportunities for locals in this area by which telecoms development of this sought has already been considered acceptable.

Any information required regarding location, height of antennas, frequency etc. can be found in the supporting documents, which are submitted as part of this prior approval application. As noted above, an ICNIRP certificate has also been enclosed. We are of the opinion that this

proposal is compliant with all relevant planning policy, as noted above, and could therefore be supported by your department.

In conclusion, the replacement monopole is necessary and proportionate development that respects the surrounding environment. It will have no adverse impact on the conservation area and nearby heritage assets, and it contributes to critical infrastructure needs with a design approach that is discreet, reversible, and sympathetic to its setting. The proposal is therefore appropriate in heritage and planning terms and should be supported.

## **3.0 Access**

Under section 42 of the 2004 Act, access requirements both to and around the site should be considered. It must be considered that this site is for telecommunications purposes only. In principle, no access to the cabinets or the mast is allowed and as such access requirements are not considered an issue.

### **3.1 Construction and Maintenance**

Access to the site will be taken directly via Rickmansworth Road. Maintenance visits are required approximately every 3-6 months by an operative with a light vehicle. Consequently, it is not envisaged that access to the site would cause traffic management or other issues. During the construction process all build, and maintenance regulations will be complied with. Proof of compliance can be confirmed closer to the time of construction if necessary.

It should be noted that the install of the equipment will be as per the latest NJUG guidelines which will of course consider the proximity of trees in the site area.

### **3.2 Public Access**

Radio base stations are not designed to be accessible by the public. The equipment cabinets would always be locked and only accessible by authorised persons. Therefore, no specific public access provisions are required to be incorporated into the design of the proposal.

## 4.0 Regulatory Statement

EE is authorised to operate a public electronic communications network and supply public electronic communications services under the provisions of the Telecommunications Act 1984, the Communications Act 2003 and the Electronic Communications Code (Conditions and Restrictions) Regulations 2003 and aims to meet all reasonable customer demand for that service.

OFCOM statistics show that in 2013 mobile phones are owned / used by 92% of UK adults. This demonstrates the vital role mobile communications play in the social and economic wealth of the country. Whilst most of the UK now benefits from mobile coverage there are still spots without coverage. EE under their communications code licence to run a public communications network are duty bound to provide equal coverage to all areas of the UK. Therefore, the need for communications systems should not be tested by Local Planning Authorities, as it is for the communications code operators to determine locations where coverage is required and demonstrate evidence.

The development proposed is to replace an existing EE installation which has been decommissioned and removed. Should this proposal not proceed, the area will be left with significantly reduced coverage or no coverage whatsoever in the future.

## **5.0 Health and Safety**

Telecommunications planning guidance states that it is not for the local planning authority to seek to replicate through the planning system controls under the health and safety regime as it is a matter for the Health and Safety Executive. The Government guidelines state that provided a proposed base station meets the ICNIRP guidelines for public exposure, then it should not be necessary for the local planning authority to consider the impacts of health concerns.

It is confirmed that the proposed equipment and installation complies with ICNIRP guidelines and a Declaration of Conformity has been submitted in support of the application.

## 6.0 Conclusions

As part of their UK upgrading programme, EE now propose to upgrade coverage in this area to include 4G and 5G services which will maintain and provide improved data services to customers in addition to the existing voice and text services they enjoy. In addition, EE provide the new UK wide Emergency Services Communications Network (ESN) and their 3G/4G/5G network will support this service. As such, the proposed replacement installation will form part of the ESN for all of the emergency services operating within this area.

The telecommunications installation proposed as set out in this application has been designed and sited having regard to technical, engineering and land use planning considerations in order to minimise its impact on the local environment. The mast height has been kept to the minimum required to ensure operational efficiency - a structure with an overall height of 20 meters is needed in this locality because of the surrounding clutter. Consideration has been given to the design of the mast and this is reflected in the standard streetworks streetpole design, which is frequently used within residential areas.

In relation to planning policy, in accordance with the guidance set out in the NPPF, a thorough search of the area has been undertaken and revealed that there are no existing masts or other structures suitable. Therefore, the development of a new mast site is justified, and it has been demonstrated that it has been sited and designed to minimise its visual impact and all other environmental impacts as far as practicable in accordance with Policy DMHB 21 of the Adopted Hillingdon Local Plan Part 2 – Development Management Policies.

The Council are therefore respectfully asked to grant prior approval.