SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Busy Bees	Site Address:	Land at Busy Bees Busy Bees 4 Iron Bridge West Drayton UB11 1BF
National Grid Reference:	E: 507437 N:180053		
Site Ref Number:	CTIL_240258_20	Site Type:[1]	Macro

2. Pre Application Check List

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

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	
If no explain why:		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	05.01.2023
Name of contact:	Planning Department
Summary of outcome/Main issues raised: No response at the time of making the planning application.	

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	

[1] Macro or Micro

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Summary issues raised: N/A

Community Consultation

Rating of Site under Traffic Light Model:	~~Red~~	~~Amber~~	**Green**
Outline of consultation carried out: Pre-application consultation was carried out with the local ward councillors for the Yearsley Ward councillors. Pre-application consultation letters and drawings of the proposals were sent to these parties on 05 January 2023.			
Summary of outcome/main issues raised (include copies of relevant correspondence): No specific comments received to date.			

School/College

Location of site in relation to school/college (include name of school/college): Busy Bee Nursery Heathrow – on site.
Outline of consultation carried out with school/college (include evidence of consultation): Pre-application consultation letters and drawings of the proposals were sent to the Manager on 05 January 2023.
Summary of outcome/main issues raised (include copies of main correspondence): No specific comments received to date.

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

Will the structure be within 3km of an aerodrome or airfield?	Yes	
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	

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Details of response: Notice served on Heathrow Airport. No response at time of making the application. RAF Northolt is not on Ofcom's List of military and civil radars to be protected therefore notice has not been served.

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	28.02.2023	
Copy of Developers notice and proof of deliveries including email delivery receipts enclosed with this application.		

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3. Proposed Development

The proposed site:

Cornerstone is the UK's leading mobile infrastructure services company. They acquire, manage and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. They oversee works on behalf of telecommunications providers and wherever possible aim to:

- promote shared infrastructure
- maximise opportunities to consolidate the number of base stations
- significantly reduce the environmental impact of network development

Cornerstone is in the process of progressing a suitable new site in the Sidcup area for a radio base station capable of providing their latest 4G and new 5G technologies.

As part of Cornerstone's continued network improvement program, there is a specific requirement for a new installation at this location to provide improved 2G, 3G and new 4G and 5G coverage and capacity, ensuring that this area of West Drayton including Heathrow has access to the latest technologies.

The Site

The site is located in the commercial area of West Drayton in close proximity to Stockley Business Park and the A408. Heathrow is located some 4km to the south. The area surrounding the application comprises low rise commercial / light industrial buildings. There is footpath to the south of the site and the railway line runs beyond that. Stockley Business Park is a Strategic Employment Area.

The proposed site will be located where there are other similar designed simple, vertical, functional structures including lighting columns. Mature trees and shrubs ranging in height from 12 – 15m in height will form a backdrop to the site and filter views.

Image 1: The application site (Source: Google Maps)

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Image 2: Birdseye view of the application site (Source: Google Maps)

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

The operator is seeking to provide 2G/3G/4G and enhanced 4G coverage and capacity to the surrounding area as well as new 5G services for Telefonica to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

The 3G and 4G provision allows internet access, video calling, data downstreaming, accessing social media networks and emailing to name just a few of the benefits. Therefore, to maintain high quality indoor 3G and 4G services in to this area would promote activity in line with the general population demand as the ownership of smart devices increases. New 5G service provision will bring faster, more responsive and reliable connections than ever before.

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Type of Structure *(e.g. tower, mast, etc): Orion*		
Description: The proposed installation of a telecommunications base station comprising a 20m streetpole (painted light grey) supporting 6 no antennas, 2no 300mm dishes, together with 2 no ground based cabinets (painted fir green) and ancillary development thereto.		
Overall Height:		20.00m Metres
Height of existing building *(where applicable):*		N/A
Equipment Housing: 1 x York Cabinet		
Length:		1.900 Metres
Width:		0.660 Metres
Height:		1.750 Metres
Equipment Housing: 1 x Shire Cabinet		
Length:		1.1050 Metres
Width:		0.660 Metres
Height:		1.750 Metres
Materials (as applicable):		
Tower/mast etc – type of material and external colour:	Grey (RAL7035)	
Equipment housing – type of material and external colour:	Fir Green (RAL 6009)	

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

Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (Paragraph 126) National Planning Policy Framework (Revised). It states:

'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'.

In keeping with the National Planning Policy Framework (NPPF) guidelines of using: "high quality communications infrastructure", the proposed design has been selected to minimise visual impact upon the surrounding environment.

The design of any communications infrastructure is dictated primarily by operational requirements and secondly by the development's setting.

From an operational perspective, the operators must ensure the following when devising a final design solution for any site:

- antennas are specifically orientated to transmit effectively and efficiently without signal being impeded;
- dish links (if required) achieve a direct line of site connection with other base station sites within the network; and
- GPS modules achieve a direct satellite link.

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To achieve this the operator undertakes panoramic assessment to determine what is the minimum height for transmission equipment to be located in a context of local topography and clutter, such as manmade or natural features, and in all cases the operator is committed to limiting the size and amount of apparatus to an operational minimum.

In terms of setting, given that the subject site is located on private land immediately adjacent to the public highway, a street furniture style development has been deemed to be most suitable type of base station as this is the most accepted design for urban, suburban and rural roadside locations throughout the UK.

The operator has carefully considered the design of the proposed column. The operator is proposing the most sensitive design currently available to provide the latest technologies, necessary coverage and capacity to the surrounding area. The height required is 20.0m, Any reduction in height will reduce the coverage footprint of the proposed installation but radio have confirmed that this compromise on height will still be able to provide meaningful service provision to this cell area. This is the lowest height that the column can be reduced to. Any lower and it would not be able to provide equivalent replacement coverage to the target coverage area or meet the more stringent ICNIRP requirements.

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

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

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

The proposed design is more visually sensitive and much easier to assimilate into a streetscene than more traditional lattice towers or unshrouded pole designs with bulky headframes. These more traditional designs are preferred by operators as they are structurally capable of hosting more equipment and give greater scope for antenna orientation and are thus more efficient structures. However, such designs would appear alien in this location. Therefore, the operator has compromised on obtaining maximum coverage to better assimilate in to the streetscene.

The design of the column resembles as closely as possible the other existing vertical structures within the immediate and wider area including lighting columns and equipment cabinets. These vertical structures will help the proposed radio base station assimilate with the surrounding area. Moreover, as previously noted mature trees ranging from 12 -15m in height provide a backdrop to the installation.

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The design of the column is a simple, functional, vertical structure which will not appear incongruous within the streetscene. This is especially so given its careful siting in alignment with other similar designed vertical items of street furniture including lighting columns. The column is proposed to be coloured grey to match the existing road signage, and lighting columns and will better assimilate with an often grey sky.

The cabinets are designed to appear like other statutory undertakers equipment cabinets, including in the immediate streetscene. The proposed equipment cabinets are small for telecommunications apparatus and proposed to be coloured Fir Green to blend in with the other equipment cabinets in the streetscene and other statutory operators equipment cabinets commonly found in urban areas. The equipment cabinets and meter cabinet can be installed under the operators permitted development rights but have been included on the plans and in the description in order to remain fully transparent.

The transmission dishes are required in order to provide a link in to the network. A clear line of sight is required in order for it to meet its design brief.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the operator's technical requirements for the site. Taking all matters into account it is considered that this proposal, to provide the latest 2G, 3G and 4G service provision and new 5G coverage providing high quality dense coverage and capacity, would not appear out of place within the streetscene.

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Technical Information

Health and Safety - including ICNIRP compliance
An ICNIRP certificate is provided as part of this application.

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, Telefonica UK Ltd operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of Telefonica UK Ltd's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.	Yes	

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4. Technical Justification

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

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

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

There is a specific requirement for a new radio base station at this location to allow Cornerstone on behalf of Telefónica to provide new 2G, 3G and 4G coverage and capacity in and around this area of West Drayton located between Heathrow and Stockley Park whilst also providing the latest 4G technology and new 5G service provision to the local area. This ensures high quality indoor service provision is provided.

Whilst it is the case that Cornerstone remains committed to the promotion of shared infrastructure and maximising opportunities to consolidate the number of base stations required in operating a shared single grid network to provide 2G 3G and 4G coverage, this can no longer be the case with all sites for the provision of 5G service.

Mobile connectivity and service is required where customers live, work and play. 5G coverage and superfast mobile broadband data capacity demand will continue to increase exponentially with the introduction of IoT (Internet of Things), machine to machine connectivity, automated transport/industry and other 'smart' applications. To this end, the existing shared infrastructure within the built environment has had to be reviewed and adapted as appropriate.

It is critical to understand that the UK's four Mobile Network Operators (MNOs), including Vodafone and Telefonica (O2), all utilise different technology spectrums to provide their mobile service. The spectrums the Operators utilise are allocated by Ofcom, as industry regulators on behalf of UK Government, through licence agreements with each of the individual MNOs. As such, each MNO must utilise the spectrum licenced to them. Each part of the RF spectrum has variations in terms of RF propagation. Therefore, the four individual MNO networks, and their sharing arrangements, cannot be compared directly and there will be variations in how all four networks are deployed and developed. For this reason, all MNOs, including Telefonica (O2) and Vodafone who continue to be competitors but share base stations where possible, have a completely different network configuration they need to fit within and build 5G service around. Therefore, the network has to be built differently, with different antennas and equipment, to take account of those spectrum and licence variations and this will lead to necessary infrastructure variations cell to cell, depending on site specific demand, local constraints and requirement. As such, the various networks will have variations in how their infrastructure is deployed and developed.

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5. Site Selection Process

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

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

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

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

In accordance with the above sequential approach, the proposal is to install a new radio base station in this location to provide 2G, 3G and 4G coverage and new 4G technology and 5G service provision.

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Site Type	Site Address	National Grid Reference	Reason for not choosing site
Existing Telecoms Sites	TEF: 78783 Yiewsley AOC 2, 2 Hillingdon	E507166 N180347	This is the next site in the network to the north west. Upgrading this installation would not provide coverage to the target area.
Rooftop	GSK site, Iron Bridge Road North, West Drayton, UB11	E507478 N180077	The development of an installation in this area is likely be restricted due to physical access constraints and other locations are considered to be more appropriate to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason.
Existing Telecoms Sites	Yiewsley East – Stockley Park Roundabout, London	E507772 N180374	This is the next site in the network to the north east. Upgrading this installation would not provide coverage to the target area.
Greenfield	Iron Bridge Road Grass Verges, Iron Bridge Road North, West Drayton, UB11 1BF	E546265 /N173955	It is not possible to install a street furniture installation at this location due to unresolvable underground services in order to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason.
Greenfield	SMC Ford Vehicle Compound, Iron Bridge Road South, West Drayton, UB7 8HY	E507067 N179997	An installation at this location is located too far outside the target area to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason.

If no alternative site options have been investigated, please explain why: N/A
Environmental Information (refer to Section 2 of Site Finder Report): No specific environmental considerations identified to date.
Land use planning designations (if Heritage Statement is required then include here or make reference to attached Heritage Statement): The site is not located within Article 2(3) land.

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

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

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

National Planning Policy Framework (July 2021)

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. In July 2021 the NPPF was revised again. Overall, it's been revised to strengthen other sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 114 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of *reliable* communications infrastructure for both economic growth *and social well-being*.

The NPPF continues to support the expansion of electronic communications networks at paragraph 114. It notes that policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF makes reference to 5G:

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

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

Paragraph 115 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 118 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

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

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

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

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[42]'...

Footnote 42 of the NPPF states:

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

The NPPF provides guidance on proposals affecting heritage assets. Paragraph 194 states that 'in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 195 goes on to state 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).

The NPPF goes on to provide guidance on considering the potential impacts of development on heritage assets. Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

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Paragraph 202 retains advice provided in the 2012 version of NPPF relating to the degree of harm. It 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.

Public benefits are defined within the NPPG 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 Practice for Wireless Network Development in England.

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

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

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

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

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

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

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

Paragraph 13 of the Code continues to echo the NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth. More specifically that planning policies and decisions should support the expansion of electronic

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

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

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communications networks, including next generation mobile technologies (such as 5G) in order to support economic growth across the country.

The CoP sets outs 'How wireless networks function.

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

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

The CoP establishes 'Principles and commitments' by which operators should develop their networks and that Local Planning Authorities should demonstrate their support by.

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

- ***Site sharing and use of existing infrastructure**: make use of existing structures, sites and masts wherever possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and sites should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion.*
- ***Consultation with local planning authorities, local communities and other stakeholders**: participate in dialogue with local planning authorities, along with other relevant stakeholders such as the highways authorities, Area of Outstanding Natural Beauty bodies, Historic England, and Natural England, including pre-application discussions, where appropriate. Maintain clear procedures, and high quality communication and consultation with local communities and other interested parties. Operators should agree community engagement with local planning authorities and share information as appropriate (see Pre-application consultation with local communities below).*
- ***Standardised and high-quality approach to planning applications, and the notification procedure**: provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements. Ensure planning submissions are of high-quality and provide the necessary evidence to support the application (as per the NPPF).*
- ***Prompt responses to enquiries**: respond to complaints and enquiries within a timely manner (see Review and Enquiries section below).*
- ***Siting and Design**: wireless infrastructure should be deployed in accordance with the guidance set out within this Code of Practice. Where appropriate, equipment should*

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comply with the principles set out in the NPPF and consider any local planning policies, including any local and national design codes. When located in protected landscapes and other designated land, the sensitive nature of these areas must be considered.

- ***Removal of redundant equipment and site restoration:*** *ensure that when infrastructure is upgraded, any equipment that is made redundant by the upgrade, such as brackets, is removed to benefit the local environment. Where a whole site is no longer in use, the site should be restored to its original state.*
- ***Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure levels guidance****: as required by spectrum licences, comply with international guidelines for limiting exposure to electromagnetic fields (EMF) - including, as set out in the NPPF, providing a statement that self-certifies that ICNIRP guidelines will be met with all applications (see Annex C).*

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

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

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

Siting and Design Principles

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

The Code provides guidance on siting and appearance principles. It sets out several design principles in respect of telecommunications development and acknowledges that the options for design used by an operator will be affected by site conditions including requirements to link the site to the network, landscape features and coverage and capacity requirements. The guidance includes at Para. 22 '*the choice over the site selection and design of equipment is primarily dependent upon the coverage*

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and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible'.

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

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

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

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

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

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

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

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evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations

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

- Protecting visual amenity
- Mitigating visual impacts

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

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.*
- *In rural areas, base stations often need to cover wider geographic areas. Operators may need to use tall masts or lattice towers to provide the required coverage. The location of masts can sometimes be dictated by access to transmission links back to the operator's main network and proximity to a power supply. Coverage in some areas can be limited because of the geography, topography and terrain'.*

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

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

<u>Local Policy</u>

The Local Plan for the West Drayton area comprises:

- The London Plan 2021
- The Hillingdon Local Plan Part 1 & 2

The London Plan 2021

The London Plan 2021 is the new Spatial Development Strategy for Greater London and was adopted in March 2021 and is now part of the statutory development plan. It sets out a framework for how

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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.'

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'… 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 New London Plan creates the strongest policies ever for Digital Connectivity.Policy SI 6 states:

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

1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is madeavailable 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; wherethat 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) toaccommodate 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).

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Cornerstone'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. and built and natural features of the surrounding area; the Hillingdon area in which it is located.

Hillingdon Local Plan

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

Local Plan Part 1 - Strategic policies

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

The Vision - where we want to be

The Vision for Hillingdon 2026 states:

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

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

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

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

Economic growth has been concentrated in Uxbridge, Heathrow and the Hayes/West Drayton Corridor, without ignoring local centres: Sustainable growth around Heathrow and the Hayes/West Drayton Corridor (Heathrow Opportunity Area) is being managed through the Heathrow Opportunity Area Framework. Hillingdon has maximised the potential of its heritage assets and places which could act as a focus for individual regeneration initiatives and continues to retain viable mineral resources

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

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

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

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

The Strategic Objectives to deliver The Vision include:

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

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

Policy NPPF1 relates to "National Planning Policy Framework - Presumption in Favour of Sustainable Development When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this Local Plan (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether: Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or Specific policies in that Framework indicate that development should be restricted

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Policy E1 relates to 'Managing the Supply of Employment Land. The Council will accommodate growth by protecting Strategic Industrial Locations and the designation of Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL) including the designation of 13.63 hectares of new employment land. Areas for managed release of employment land are shown on Map 5.1.

The application site is located in an area proposed for hotel and office growth.

Policy BE1 relates to 'Built Environment' and states *"The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:*
1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;
2. Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;
3. Be designed to include "Lifetime Homes" principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives;
4. In the case of 10 dwellings or over, achieve a satisfactory assessment rating in terms of the latest Building for Life standards (as amended or replaced from time to time);
5. Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance;
6. Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;
7. Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;
8. Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals;
9. Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas;
10. Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document (LDD). All developments should be designed to make the most efficient use of natural resources whilst

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safeguarding historic assets, their settings and local amenity and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill;
11. In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape. Support will be given for proposals that are consistent with local strategies, guidelines, supplementary planning documents and Hillingdon Local Plan: Part 2- Development Management Policies".

Policy EM1 relates to 'Climate Change Adaptation and Mitigation'

The Council will ensure that climate change mitigation is addressed at every stage of the development process by:
1. Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport.
2. Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency.
3. Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market.
4. Working with developers of major schemes to identify the opportunities to help provide efficiency initiatives that can benefit the existing building stock. 5. Promoting the use of decentralised energy within large scale development whilst improving local air quality levels.
6. Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions.
7. Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation as part of their proposals.
8. Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricty and a greater use of waste as a resource.
9. Promoting new development to contribute to the upgrading of existing housing stock where appropriate. The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:
10. Locating and designing development to minimise the probability and impacts of flooding.
11. Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.
12. Giving preference to development of previously developed land to avoid the loss of further green areas.
13. Promoting the use of living walls and roofs, alongside sustainable forms of drainage to manage surface water run-off and increase the amount of carbon sinks
14. Promoting the inclusion of passive design measures to reduce the impacts of urban heat effects.

Policy CI1 relates to 'Community Infrastructure Provision' states "*The Council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations by: 1. Resisting of the loss of community facilities, and where the loss of these facilities*

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is justified it will seek to ensure that resulting development compensates these uses to ensure no net loss;
2. Supporting the retention and enhancement of existing community facilities; 3. Supporting extensions to existing schools and the development of new schools and youth facilities; 4. Encouraging the development of multi-purpose facilities that can provide a range of services and facilities to the community at one accessible location;
5. Promoting innovation in service provision and recognising that there are a range of modes appropriate for providing for all sections of the community;
6. Requiring development to contribute towards the provision of community facilities to meet the needs of new communities and mitigate impacts on existing communities;
7. Locating libraries, health facilities, police facilities, leisure facilities and community centres in town centres or other accessible locations to maximise community access, sustainable transport and build a sense of local community identity;
8. Ensuring new facilities demonstrate how they will tackle climate change, in line with Policy EM1;
9. Providing facilities and services that are accessible and inclusive to all potential users regardless of age, ability, gender or socio-economic status; and
10. Implementing a borough-wide Community Infrastructure Levy (CIL) to fund community infrastructure provision".

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

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

Policy DMHB21 relates to 'Telecommunications' and states:

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) it has been demonstrated that there is no possibility for use of alternative sites, mast sharing and the use of existing buildings;
v) there is no adverse impact on areas of ecological interest, areas of landscape importance, archaeological sites, Conservation Areas or buildings of architectural or historic interest; and
vi) it includes a Declaration of Conformity with the International Commission on Non Ionizing Radiation.

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

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

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

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

'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;*

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1530 Arlington Business Park,
Theale, Berkshire, RG7 4SA

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.

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Cornerstone, Hive 2,
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Theale, Berkshire, RG7 4SA

- 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.*

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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

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1530 Arlington Business Park,
Theale, Berkshire, RG7 4SA

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'.

The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place. Maximising access and maintaining choice in telecommunications should will people to maintain and enhance economic, social and civic connections. Universal accessibility to telecommunications is vital to help overcome isolation or exclusion of urban life. Accelerating the extension of new communications modes should help to avoid new pockets of exclusion developing.

Further to the Government's commitment to improve digital connectivity, on 04th April 2022 the new permitted development rights for telecommunication operators came into force (SI 2022 No.278). The Explanatory Memorandum to the Town and Country Planning (General Permitted Development) (England)(Amendment) Order 2022 confirms that '*permitted development rights have an important role to play in the planning system. They provide a more streamlined planning process with greater planning certainty, while at the same time allowing the local consideration of key planning matters through a light-touch prior approval process'.*

Connected Nations 2022 – England

The OFCOM Connected Nations 2022 – England Report acknowledges that in England 4G geographic coverage is currently at 92-94% and the UK geographic coverage is just 80-87%. An installation designed to fill the hole in 4G coverage and provide new services to this area would help to increase the 4G and 5G coverage in line with Government targets.

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

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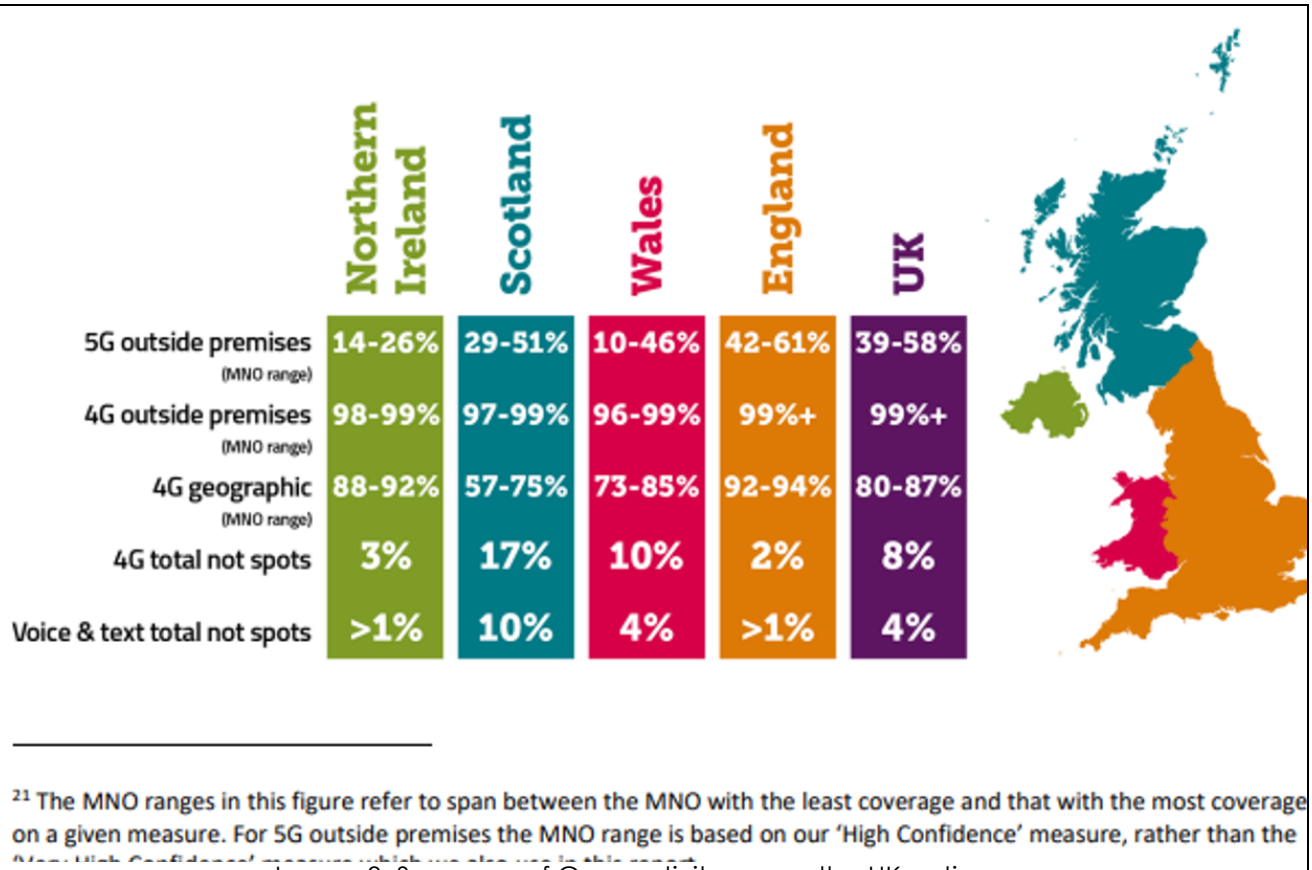

[21] The MNO ranges in this figure refer to span between the MNO with the least coverage and that with the most coverage on a given measure. For 5G outside premises the MNO range is based on our 'High Confidence' measure, rather than the

Image 3: Summary of Connectivity across the UK nations

Source: Connected Nations 2022 – England Report

Table 3.3 in the Report (Image 5 below) highlights the 4G coverage from all four MNOs. As can be seen below, in rural areas 4G coverage is only 90% in England, compared to 99% + in urban areas, in 2022. This proposal would help to reduce the urban to rural 4G connectivity divide.

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1530 Arlington Business Park,
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	2021	2022
England	**98%**	**98%**
Urban	99%	99+%
Rural	89%	90%
United Kingdom	**98%**	**98%**
Urban	99%	99%
Rural	87%	88%

Source: Ofcom analysis of MNO predictions (September 2022).

Image 5: Outside 4G coverage from all four MNOs, urban / rural breakdown
Source: Reproduced from Connected Nations 2022 – England Report

Table 3.4 in the Report goes on to describe the geographic coverage of 4G, comparing the coverage from at least one MNO and from all MNOs both in England and across the UK. As can be seen, there is 92% coverage across the UK from at least one MNO, but only 70% from all MNOs.

	From at least one MNO		From all MNOs	
	2021	2022	2021	2022
England	**98%**	**98%**	**84%**	**85%**
Urban	99+%	99+%	98%	98%
Rural	97%	97%	82%	83%
United Kingdom	**92%**	**92%**	**69%**	**70%**
Urban	99%+	99+%+	97%	97%
Rural	91%	91%	66%	67%

Source: Ofcom analysis of operator data (September 2022).

Image 6: Yearly increase in 4G geographic coverage, from at least one MNO and all MNOs

Source: Reproduced from Connected Nations 2022 – England Report

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Online Nation 2022 Report

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

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

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

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

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

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

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

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

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

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VAT No. GB142 8555 06

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

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Figure 1.2: Percentage of UK online adults accessing the internet, by device: 2021

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

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

Image 6: Percentage of UK online adults accessing the internet, by device: 2021

Source: Reproduced from Online Nation 2022 Report

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

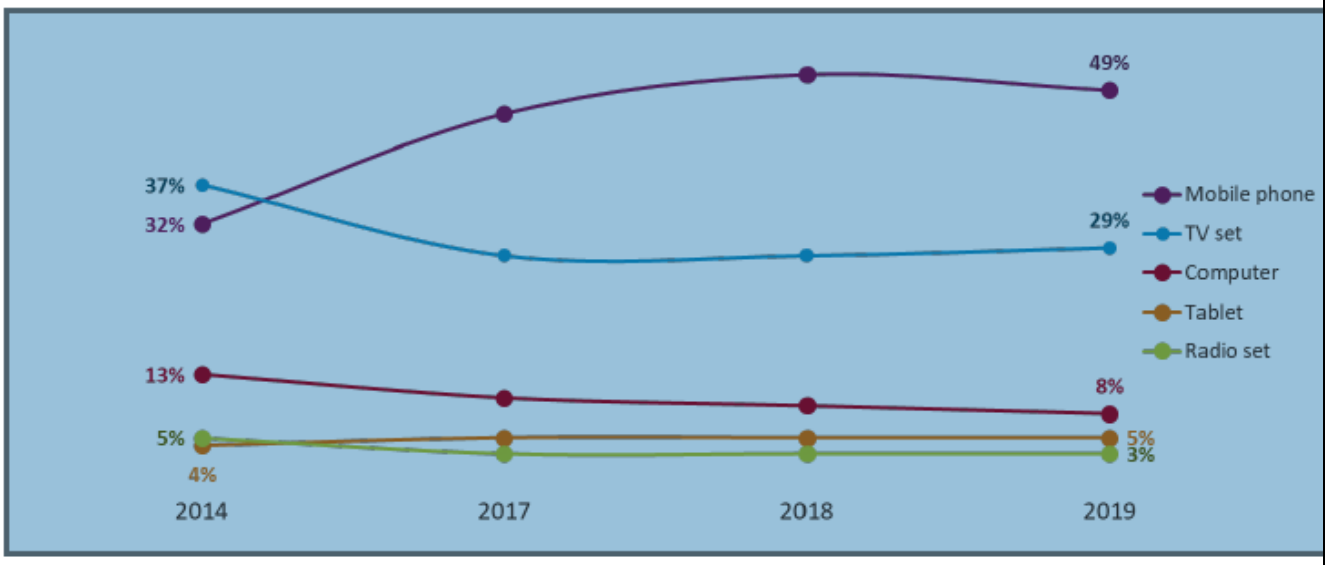

Image 7: Most-missed device among adults

Source: Ofcom Adults' Media Literacy Tracker 2014-2019

Planning Issues

The main issues arising from this prior approval notification are whether the proposed mast and cabinets due to their scale and siting would be a visually obtrusive feature which would be detrimental to the character and appearance of the area. Whether any perceived harm would outweigh the significant social and economic benefits associated with the increased service provision attributed to

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the proposal and other valid material considerations as outlined within NPPF, London Plan and Policy SI 6 of the London Plan and DMHB21 of LP2.

Principle of Development

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

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

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

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

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

Siting

The siting of the proposed radio base station has been carefully considered. To this end, the equipment has been located within the adopted highway to the rear of the footway. The proposed equipment will be viewed within the context of linear items and mature trees. This is in line with Policy S16 of the London Plan and Policy DMHB21 of LP2.

Mature trees provide a backdrop to the lower sections of the base station and cabinets. Moreover, there are a number of vertical structures within the immediate area which will help the installation assimilate with its immediate environment including lighting columns. These vertical structures are similarly designed i.e. to be simple, functional vertical structures. These structures will help the column and associated cabinets from appearing prominent in the streetscene. Consequently, the visual impact of the proposed radio base station will be minimised within the streetscene. This is in full accordance with the aspirations of the extant policies of the Policy SI 6 of the London Plan and DMHB21 of LP2.

The proposed equipment cabinets, do not require planning permission, as they can be installed under the operators permitted development rights. In order to remain fully transparent, they have been included on the plans and in the description. The operator's equipment cabinets are similar to those of statutory undertakers which are commonplace on the public highway. Although it noted that the application site is located on private land adjacent to the public highway. This is in full accordance with Policy SI 6 of the London Plan and DMHB21 of LP2. Their limited height and scale will ensure that

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these cabinets will not be detrimental to the visual amenity of the area and will be finished in a green colour to blend in with the adjacent coniferous trees and shrubbery.

In line with the requirements of NPPF, there are no existing telecommunications installations for the operator to share, that would provide the necessary coverage to the target coverage area. Similarly, there are no buildings which are suitable and available that the operator could utilise to operate their equipment. The discounted options are set out in Section 5 above and their reasons for being discounted are fully explained.

Appearance

The design of the monopole has been carefully considered. To this end, it is a simple, functional slim-line monopole, with the main column being split in to two sections. This column width is essential in order to safely support the antennas at the top of the column. The column is proposed to be grey to blend in with the other vertical structures nearby and assimilate with an often-grey sky.

In order to reduce the visual impact on the surrounding area the antennas are proposed to be tight to the top of the column, rather than on an open head frame which would appear more prominent in the streetscene. Therefore, the operator has compromised on optimising the coverage in this area of West Drayton in order to minimise the environmental impact, by shielding the antennas. However, meaningful coverage will still be able to be provided to the target coverage area, hence the submission of this prior approval application in this location to maintain high quality indoor 2G, 3G and 4G service provision to be linked into the operator's network configuration as well as providing new 5G services.

The presence of the linear structures including the lighting columns and the trees in the immediate area will ensure that the proposed column will not appear incongruous within the streetscene. Thus, there will be no detrimental loss of visual amenity to the area or environmental intrusion in line with the London Plan and Policy SI 6 of the London Plan and Policy DMHB21 of the Local Plan Part 2.

The telecommunications mast is proposed to be a slim-line simple, vertical, functional structure. The column is relatively slender and similar in design to the existing vertical structures in the immediate area on the public highway albeit taller in height. As a result, this installation would not appear incongruous within the streetscene in line with the requirements of London Plan and Hillingdon Local Plan Policies.

The installation of this 20.00m slim-line column designed to be as similar as possible to the other linear structures found in the immediate area and lighting columns on the public highway will be no more at odds with the streetscene and character of the area than the other vertical structures within the immediate locale.

It is accepted that the height of the proposed installation is taller than other pieces of surrounding linear structures 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. 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

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Cornerstone Telecommunications, Infrastructure Limited,
Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.
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VAT No. GB142 8555 06

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

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of infrastructure within a streetscene 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 2G/3G/4G/5G 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 proposed height at 20.00m is essential in order to clear the mature trees and urban clutter in the area and provide equivalent replacement coverage to the target coverage area of West Drayton.

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

The equipment cabinets are designed to appear like other statutory undertakers equipment cabinets often found in urban areas. They are small for telecommunications equipment. The proposed equipment cabinets are the least amount of cabinets that can be installed in this location and enable the radio base station to operate. If the number of cabinets were to be reduced then there would not be sufficient room to house all the operators equipment. In any event, these cabinets are permitted development under the operators permitted development rights. They have only been included in the description and on the plans in order to remain fully transparent. In order to help blend in with their surroundings they are proposed to be coloured green, although they can be coloured any other colour that the council considers to be appropriate.

The design of the radio base station is one of the most sensitive designs available to the operators, designed to resemble typical existing urban linear street furniture, and that will allow two telecommunications operators to operate from a single site. This is in line with the requirements of NPPF which supports equipment which is sympathetically designed and camouflaged where appropriate [paragraph 115], The Code of Best Practice as well as the aspirations of both the London and the Hillingdon Local Plan.

The proposed new site accords with NPPF because the equipment will resemble other linear structures within the area and will ensure high quality communications infrastructure is maintained in the area. Placing masts near similar structures such as telegraph poles, powerlines and road signage, utilising simple and unfussy designs is acknowledged in the Code of Practice on Wireless Network Development in England to be less likely to dominate and be in discord with the streetscene and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area.

Lack of Coverage – Material Consideration

In accordance with the NPPF, the proposed installation is significant to enable continuous coverage of the telecommunication network, ensuring that this area of Sidcup continues to get the mobile coverage it needs for Telefonica customers as well as new 5G coverage. It will also maintain and improve coverage for the Mobile Virtual Network Operator's (MVNOs) which use the Telefonica network which includes GiffGaff, Tesco Mobile, Sky Mobile, and Lyca Mobile. So, the proposal will not only provide improved and new service provision for one operator but those who buy network space

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off them, which is at least 4 with Telefonica. This will provide a choice for those customers who consider the level of coverage in their area when selecting which operator they agree future contracts with.

The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place. In the justification to Policy SI 6 of the London Plan and Policy DHMB 21 it is acknowledged that maximising access and maintaining choice in both telecommunications should enable people to maintain and enhance economic, social and civic connections. Universal accessibility to telecommunications is vital to help overcome isolation or exclusion of urban life. Accelerating the extension of new communications modes should help to avoid new pockets of exclusion developing. The proposed radio base station enhancing existing service provision and providing new 5G technology will support this policy justification.

By providing the latest 4G technology and new 5G service provision the proposals will also help meet the aspiration of the London Plan, with all businesses, residents and public services all having access to a world class digital infrastructure.

New 5G coverage in this part of West Drayton, London will also fully comply with the London Plan by helping to meet the challenge to provide pervasive, affordable, resilient digital connectivity. The London Plan notes that if this challenge is to be met then early roll out of 5G especially in areas where mobile data use is congested is needed. The proposed upgrade will fully meet this policy aspiration. The proposals will also help London to be a smart and digitally ready city-region, where resilient fixed connectivity supported by 5G service provision is required. The proposed installation will fully comply with this aim.

Trials have already begun across the UK to demonstrate the potential of 5G and how it can improve and drive productivity and efficiency. In June 2019, West Midlands 5G partnered with BT and University Hospitals Birmingham to trial the UK's first 5G Connected Ambulance. Real-Time communications between the paramedics and the hospital doctors enabled the effective diagnosis of the patient at an early stage of care. The trial showed how a paramedic performed a remote-controlled ultra-sound scan on a patient in an ambulance over a public 5G network. These trials show how digital connectivity and technology can reduce patient waiting times and save lives (Source: WM5G).

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

Without this new radio base station, the operator's customers would experience increasing numbers of dropped calls and buffering unable to access the internet on their handheld devices. They would also not be able to access the 5G network, a demand which is increasing rapidly as customers update their handheld devices to ones that are 5G compatible, and one that London is embracing with its ambition to be a world leading digital city and 'smart' city where early roll out 5G is encouraged to provide pervasive, affordable, resilient digital connectivity. If the 5G network is not available then the customers' would not be able to utilise these handheld devices for the purposes in which they were purchased. This would be contrary to both the aspirations of Central Government and the Mayor of London aspirations which aspire to everyone having access to the superfast highway network wherever they are and being a world leader in 5G.

The proposed installation will help improve the area's economic prosperity, strengthen the urban economy's by supporting local businesses to start, grow, adapt and diversify. It will support a better environment for today and tomorrow by reducing the need to travel and in turn minimise carbon

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emissions, a key ambition of the NPPF, London Plan and Hillingdon Local Plan. The radio base station will support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders (every missed NHS appointment costs the NHS approximately £160 source: NHS), reminders to take medicines, make appointments etc. As well as assisting hospital outpatient appointments and emergency consultations carried out remotely via video link, connected ambulances, live streaming of CCTV footage etc.

By enhancing the 2G, 3G and 4G service provision to the surrounding area and providing new 5G coverage into the operators' network, this would fully support the aspirations of the London Plan.

The Councillor's Guide to Digital Connectivity notes that a survey conducted by the Confederation of British Industry found that 81% of firms said that they see more reliable mobile connectivity as essential. Studies have also shown that mobile broadband is associated with positive impacts nationally, such as higher GDP and increased employment.

Therefore, the Government fully supports high quality communications infrastructure, even more so with the advent of 5G. Indeed, The NPPF continues to strongly support telecommunications connectivity and states at paragraph 114 that local planning authorities should support the expansion of electronic communications networks. It acknowledges that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.

The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.

To emphasis the Government's strong support for 5G and the important role that local authorities have in supporting its roll-out, Matt Warman former Minister for Digital Infrastructure wrote a letter to all Local Authority Chief Executives, CCing all Local Authority Chief Planning Officers highlighting their role in facilitating the roll-out of next-generation infrastructure and prevent misleading claims becoming a barrier to rollout. The letter (see Appendix 2 for a copy) highlighted the growing importance of digital connectivity:

> 'Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data is increasing rapidly, and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality connectivity'.

The letter goes on to state the Government ambition for 5G roll-out:

> *'The Government is committed to extending mobile network coverage across the UK and providing uninterrupted mobile signal on all major roads, and our ambition is for the majority of the population to have access to a 5G signal by 2027'…*
>
> *The Government is also investing £200 million in a programme f 5G testbeds and trials to encourage investment in 5G so that communities and businesses can benefit from this new technology. The increased capacity, reliability and functionality offered by 5G is opening-up the potential for new innovative services for individuals and increased productivity for industry'.*
>
> *The planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliable on mobile connectivity. Following our consultation on the principle of reforms to permitted development rights to support 5g*

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deployment and extend mobile coverage we recently published a technical consultation on the details of our proposed changes.

The National Planning Policy Framework ("The Framework") for England states that planning policies and decisions should support the expansion of electronic communications networks, including next general mobile technology, such as 5G.

An installation in this location will ensure the lack of new 5G high quality service provision is filled and will enable Telefonica and MVNOs who buy network space off this operator to maintain access to their handheld devices wherever they are for the purposes in which they were purchased. This is fully in line with the Government's aspirations that everyone has access to the superfast communications network, the NPPF and the London Plan.

Access to the internet in whatever medium now impacts every facet of our lives but only benefits those who can access and use it. The benefits of internet connectivity are key for both residents and businesses alike and a new radio base station in this location providing the latest 2G, 3G, 4G and 5G technologies will support the Mayor of London's aspirations to be a world-leading digital city and one which promotes the growth of the digital sector, increasing digital inclusion, so all people can access services, education and training.

In line with guidance contained within the NPPF and the London Plan, a new radio base station in this location will enable fast, reliable, secure internet accessibility wherever the user is located. It would fully meet the latest operators' coverage and capacity requirements for 3G, 4G and new 5G provision. This would be wholly in line with the Government's latest aspirations to strongly support advanced, high quality and reliable communications infrastructure, essential for economic growth and social well-being. Where the NPPF notes that decisions should support the expansion of electronic communications networks. An installation outside this search area, regardless of whether there are existing sites, would not allow the operators to provide their desired level of coverage and therefore would not adequately maintain and provide new coverage and capacity.

As part of the operators 4G licence obligations, many customers will benefit significantly from a vastly improved service provision in this locality. They will be able to gain access to the very latest technologies and connectivity, including 5G, to high speed data services. The importance of which is fully highlighted in the London Plan.

The Code of Practice acknowledges that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which we rely. With increasing consumer demand and the Government's aspirations for high quality communications infrastructure it is ever more important to improve connectivity and capacity.

The Code of Practice acknowledges that there will be times when there is a need for a new radio base station, where sites have been lost, where areas have limited or no coverage and where coverage and capacity need to be enhanced. This application is one such example where there is a need to enhance 3G and 4G provision and provide new 5G services within this area. Currently there 5G coverage is none existent in this part of the borough.

In the Code of Practice it acknowledges '*the pressure on networks to upgrade and improve networks through changes to existing sites and the development of new sites is constant. With the increasing consumer demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity. This is due to the ever increasing demand for data hungry applications to be available to a range of connected devices, such as smartphones and tablet*

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computers. However, The Code notes that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which they rely'. Therefore, there is a significant need to locate the equipment in this area.

The Online Nation 2020 Report highlights the importance of continued access to the latest technology on mobile devices, with 35% of the internet users only accessing the internet on mobile devices (Smartphone or tablet).

The Report goes on to note that 60% of the consumer market consider smartphones are now the most important device for internet access. In September 2019, 81% of time spent online was on a mobile device (both tablet and Smartphone). Furthermore, nearly half of all adults consider that their mobile device is the device they would miss most if it were taken away.

The Online Nation 2020 Report found that until early this year, online video calling was used much less than other online communication services, with 35% of online adults using online video calling at least weekly in the 12 months to February 2020. In May 2020, this had doubled to 71% of online adult consumers using online video calling services at least weekly, with 38% using them at least daily. Their research suggests that 7% of adult internet users used video calling for the first time as a result of the coronavirus pandemic.

Consumers in the UK continue to decrease their use of landline calls in favour of using mobile calls and mobile data. Between 2012 and 2018, the total volume of outgoing landline calls in the UK more than halved, decreasing by 59 billion minutes, from 103 to 44 billion minutes. Over the same period the volume of outgoing mobile phone calls increased, but only by 29 billion minutes, from 132 to 161 billion minutes. This suggests that consumers are not simply substituting landline calls with mobile networks calls. There are indications that they are substituting at least some landline calls with online voice and video calls. On smartphones, online calling can offer a lower cost alternative to making calls using a voice tariff: 87% of UK adults who have ever used online voice or video calls did so using a smartphone.

The operator not only has a license requirement to provide a certain level of 2G/3G/4G coverage to the population the operators' are obliged to meet the growing consumer demand for 5G coverage, especially as more people are purchasing 5G enabled devices, in line with their license obligations and the operators competitive market driven "requirement" to provide a high quality service. Customers expect to be able to access their portable hand held devices wherever they are, whether that be indoors or outside. There is currently no 5G service provision that is provided by Telefonica in this cell area. The least impact on the surrounding environment in order to fill this gap is by installing a new radio base station at the application site.

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

Economic and Social Benefits

The NPPF strongly supports sustainable development as does the London Plan and Hillingdon Local Plan. Mobile communication plays a significant role in sustainable development, being able to access the internet via a mobile device allows people to access a wide range of central and local government services buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, participate in social media, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without

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1530 Arlington Business Park,
Theale, Berkshire, RG7 4SA

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needing to return to the office. Residents and businesses will enjoy better accessibility, assisting home-base working by improving the electronic means of communication and the roll-out of high-speed broadband helping to promote live-work development. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with NPPF to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Enhancing the 2G, 3G and 4G coverage and capacity in this area and providing new 5G services will fully meet this national policy objective. Continuing to transform the digital connectivity of the city-region to drive economic growth and innovation, working to meet national targets of full roll-out of 5G technology for most people by 2027 will comply with the ambitions of the of the London Plan.

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 essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

The enclosed Cornerstone Local Authority Engagement Brochure September 2020, emphasises further the benefits of high quality mobile connectivity including: promoting economic growth by attracting investment from business, which creates jobs and regional prosperity in line with national and local economic strategies; helps local businesses to offer a broader range of services, boosting the local economy; helps local Councils to offer online services such as school admissions and local information for residents supports local companies by facilitating working from home, offers social benefits such as being able to connect with vulnerable family and friends (a life line during COVID 19 lockdown) or contact the emergency services 24/7, and helps local councils to offer online services such as paying council tax bills which provides a more efficient service to name but a few benefits.

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

Paragraph 38 of the NPPF states that:

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

Providing improved 3G and 4G coverage and capacity and new 5G service provision in this area will fully meet paragraph 38 of the NPPF, the Hillingdon Local Plan and London aspirations. These strategies and the Framework also support strengthening digital and data infrastructure (including 5G) and using data to help address challenges.

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

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

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

Indeed, MPs have noted in parliament that the UKs Superfast Broadband connectivity was 'relatively poor' and businesses were losing out from patchy coverage.

The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where they live, work, visit and travel. That is why the Government is committed to extending mobile geographical coverage further across the UK, with continuous mobile connectivity provided to all major roads and to being a world leader in 5G. This will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage. As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver property at the local level and enable all places to share in the proceeds of growth.

The Government is determined to ensure the UK receives the coverage and connectivity it needs. To this end, the Government wants to be a world leader in 5G, the next generation of wireless connectivity, and for communities to benefit from the investments in the new technology.

The case for 5G is compelling as it will bring faster, more responsive and reliable connections than ever before. More than any previous generation of mobile networks, 5G has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time, creating the so-called "Internet of Things". This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for business and farmers, all through the real-time management of data.

The Local Government Association (LGA) has produced a Councillor's Guide to Digital Connectivity and sets out some of the benefits of 5G technology:

- Faster mobile broadband and a more consistent experience in congested areas with a very high number of devices.

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- Industrial applications, enabling businesses to improve their productivity, for example through predictive maintenance and real-time analytics.
- Internet of Things (IoT) services, many of which will help council's and businesses deliver services more efficiently including:
    - Transport and logistics: connected parcels and fleet tracking.
    - Health and social care.
    - Environmental monitoring: sensors monitoring air quality and water pollution in real-time.
    - Smart agriculture and smart animal farming, smart retailing.
    - Connected and autonomous cars: allowing cars to communicate with each other, other road users and even the road infrastructure.

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

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

The Assessment goes on to note that '*Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy*'. Therefore, this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of replacing, maintaining and enhancing high quality 2G, 3G and 4G coverage and capacity in this part of West Drayton as well as providing new 5G in this area, where the social and economic benefits will outweigh the environmental considerations in line with Policy SI6 of the London Plan.

The Government's continued strong support for connectivity is further evidenced by the DCMS who launched their UK wide Digital Connectivity Portal on 20 December 2018. The Digital connectivity portal provides guidance for local authorities and network providers on improving connectivity in local areas. The Government wants everyone in the UK to benefit from world-class connectivity no matter where they live, work or travel. The Future Telecommunications Infrastructure Review outlines a package of measures to create the right market and policy conditions to deliver world-class connectivity for citizens and businesses. As a result, the pressure to provide a new radio base station in this part of West Drayton to provide 2G, 3G, 4G and 5G is significant.

On the 23 September 2020, the former Digital Infrastructure Minister Matt Warman MP spoke about the ongoing work by the Government and telecoms industry to boost the UK's world class digital connectivity in his keynote speech at Connected Britain 2020[2]

[2] https://www.gov.uk/government/speeches/matt-warmans-keynote-speech-at-connected-britain-2020?utm_source=01ad07cc-6884-4d9b-a0ca-8c212f0a4289&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate

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…'I'd like to take this opportunity to thank everyone in the industry for their tireless efforts at keeping us all connected through an unprecedented period of disruption.

…COVID has altered the way we live, work and most importantly, stay connected with our family and friends. The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown – and is now more important than ever as we head into recovery. Many of these changes – such as increased working from home – will stay with us for the foreseeable future.

People have referred to the internet as "the fourth utility" – and it's true. For countless people across the country, having fast and reliable broadband and a good mobile connection is as essential and vital to our daily lives as gas, water and electricity.

That's why I'm committed to working with you to ensure the entire nation has access to world-class, next generation gigabit connectivity that is secure and resilient enough to deal with all sorts of future challenges.

This Government is ambitious for the UK's digital infrastructure.

And because we know that more citizens are increasingly living their lives online, we will be one of the earliest adopters of 5G coverage, with the majority of the population able to access 5G by 2027.

...We know how important local authorities are to the delivery of digital infrastructure, which is why I have written to them, together with the Local Government Minister, to outline how they can work more effectively with the industry…

….Turning to 5G, while the commercial rollout of 5G continues at pace, we're pushing ahead with plans to make sure all sorts of industries benefit from this game-changing technology.

….since the start of the 5G Testbeds and trials programme, we've now funded 24 5G testbeds across the UK. Between them, those testbeds have trialled almost 70 different 5G technologies, products and applications. And more importantly than ever, we are investing in a range of sectors to foster, build and grow 5G cross wider industry...

…The world is in the middle of a digital revolution. COVID has accelerated this process, digitising almost every part of our everyday lives and making the infrastructure that connects us more important than ever. That's why it is at the top of the government's agenda…

This Keynote Speech by Matt Warman MP (former Digital Minster) highlights the importance that Government places on 5G and advanced, reliable, high quality 5G technology. To prevent this technology from being brought into the area would be contrary to the Government's key aims.

On the 1 October 2020, as part of the Speed up Britain Campaign, The Centre of Policy Studies Report published '*Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution*'[3]. The report identifies what the 5G opportunities are and what the Government needs to do so we can all benefit from this vital new technology. It states that delays to the rollout of 5G could cost the country tens of billions of pounds in lost economic output. The former Government advisers Alex Jackman and Nick

[3] https://www.cps.org.uk/research/upwardly-mobile

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King argue that Government's 'levelling up' agenda and the UK's recovery from the COVID-19 pandemic is at risk without a faster 5G rollout – to the tune of £41 billion.

The report highlights that if delays continue at their current rate, by 2027, over 11 million households and businesses could be missing out on vital digital connectivity. 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 report states that '*the UK must have a functioning network to now support the recovery from the pandemic, empowering businesses and communities with wider coverage, and preparing the ground for the services that 5G can provide*'.

Using analysis by the independent consultancy Policy Points, the report estimates that if 5G coverage reaches a quarter more of the population than the Government's current target of 51%, it will produce GDP gains of £41.7 billion by 2027. It highlights that the difference between the UK being a leader and a laggard in 5G adoption could be as much as £173 billion in incremental GDP over the coming decade, as estimated by the Future Communications Challenge Group.

The manufacturing, construction and agricultural sectors have been hit particularly hard by the pandemic, and these would benefit significantly from improved connectivity. However, onerous planning rules and loopholes in existing legislation are slowing down the infrastructure upgrades needed to make the most of this mobile revolution in these much-needed industries.

Digital networks and services have underpinned our resilience to the COVID-19 pandemic and they will drive our recovery. By expanding them, we deliver not only immediate benefits but also the essential foundation stone for future prosperity.

The report highlights that while 5G promises to create economic benefits through increased capacity, reliability and speed – vastly improving business productivity and removing barriers imposed by poor digital connectivity – the system is plagued by red tape.

The report acknowledges that the gains are not just at national level. A more extensive digital infrastructure helps local areas to attract and retain businesses and talent, thereby playing a vital role in reducing regional inequalities. Providing a supportive environment for digital infrastructure is one of the few things the Government can do that costs little, boosts growth and helps level up the UK….the key is speed. **The faster a network is built, the bigger the regional gains** (emphasis added). The telecommunications industry faces challenges on this front. The COVID-19 pandemic has increased demand on networks but delayed the availability of new spectrum to provide additional capacity.

The report notes that the reliability and reach of 4G is more important than ever. It is needed both to quench immediate demand, and also to facilitate future 5G rollout, as the underlying passive infrastructure will initially support both technologies. Every failure to provide better coverage not only presents an immediate opportunity loss for local business and consumers but also has a bigger downstream economic impact. It acknowledges that productivity gains to business, equality gains for regions and economic gains for the country are only as achievable as the networks they can access.

The report recommended that the Government should reform the strategic planning framework to compel local authorities to ensure that the needs of future mobile connectivity are adequately addressed in Local Plans and that new developments are assessed on how they might impact, or could support, local connectivity.

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

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

The Government's ambition for the majority of the UK population to have access to 5G signal by 2027 was repeated in the letter to all the Councils chief Execs and Chief Planning Officers from the then Minister for Digital Infrastructure Matt Warman. This letter also acknowledged that the demand for data is increasing rapidly and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality mobile connectivity to stay connected and for businesses to grow.

The proposed installation in this location will allow the operator to provide new and improved high quality 2G, 3G and 4G coverage and capacity and new 5G service provision supporting the Government's aim of '*focusing on ensuring that everyone is connected to the information superhighway*' and 'for the majority of the population to have access to a 5G signal by 2027'. This fully meets the aspirations of the NPPF, and the London Plan.

An installation in this location providing 5G will ensure that the expansion of the electronic communications network is facilitated and that high quality communications infrastructure is provided to the immediate area.

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

Economic benefits

- Creating more productive and cost efficiencies for businesses
- Businesses offering online services can extend their products to a broader audience
- Local areas and businesses can benefit from tourists and visitors as hotels, attractions, and restaurants can be booked online from anywhere in the world
- Business owners and services like doctors can provide a faster and more cost-effective service by offering both online appointments and ordering
- Digital connectivity facilitates economic growth, something which the Government is keen to progress and promote
- 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security will also facilitate learning on the job procedures, thanks to technologies such as Augmented Reality (AR) goggles, which, for example, can give the likes of engineers real-time instructions on how to fix a machine on a production line.

Social benefit

- Mobile communications can help people to stay in touch wherever and whenever, which can help improve social wellbeing
- Convenient access to online commerce or businesses
- Contacting emergency services is easier, especially in remote areas
- Giving the ability to manage our personal finances and information 24/7
- Using a mobile wherever you go can provide better personal security
- Having access to social networking sites and applications can keep people entertained with their lifestyles and interests
- Access to real-time transport information or timetables
- Smart meter reads for utilities such as gas or electric
- Contacting local authorities
- Promotion of smarter and productive ways of working. For example, working from home can help minimise commuting which can provide better work and home life balance

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Sustainability and Environmental benefits

- Facilitating remote access to services, education, and commerce, reducing the need to travel and in turn minimising carbon emissions.
- Better monitoring and control of energy consumption through climate change technology, smart metering and smart energy grids.
- 5G infrastructure requires fewer heat generating electronic components.
- 5G enabling of the Internet of Things (IOT) sensor deployment can manage and alert us to pollution risks, health hazards and flood risk.
- Provision of smart technologies within the agricultural sector will facilitate more efficient and less wasteful practices helping to limit negative impacts.
- 5G networks allow monitoring of traffic flow resulting in less congestion and better air quality. They also make driverless cars possible; a means of transport that offers better fuel efficiency.
- Smart cities and buildings can rely upon 5G networks to enable buildings and infrastructure to use automated energy saving through better and more efficient lighting, heating, cooling and other operations.

Health benefits

- Support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.
- Patients across the country are now becoming accustomed to using remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.
- 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

Education benefits

- Facilitates access to educational establishment databases or booking systems for securing places for the likes of school dinners, field trips, extra-curricular activities, student/teacher reviews, etc.
- Provides access to school/college/university apps for setting and submitting homework/coursework, ensuring news and notifications are delivered efficiently, and for parent/student/teacher interactions.

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

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

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Education

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

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

Health

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

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

Summary

The proposed site has been carefully sited on private land adjacent to the public highway against the backdrop of mature trees and shrubbery. There are other vertical structures in the wider vicinity of the proposed installation including lighting columns. As this is a prior approval application, the Government confirms that this is permitted development, akin to outline planning permission, with just the finer details of siting and appearance to be considered by the local planning authority. The vertical structures in the wider street scene help the proposed installation assimilate with the streetscene and not appear alien in the immediate area.

To ensure the effective operation of the site within the network, and to ensure compliance with ICNIRP requirements, the minimum height of pole that could be deployed at this location is the proposed 20.00m installation.

Site selection was progressed in accordance with the applicants licence obligations, advice in the NPPF and the Code of Best Practice and represents the least environmentally intrusive, technically suitable, available option. It has been demonstrated that there are no more suitable sites that could provide this essential service to this cell area.

The social and economic benefits of providing reliable and high quality mobile broadband connections including 5G support growth in productivity, efficiency and labour force participation across the whole economy is a strong material consideration in the determination of this application. It is fully supported by the NPPF, the London Plan and saved policies of the UDP. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area or perceived harm to heritage assets as set out above in the preceding paragraphs.

Confirmation that submitted drawings have been checked for accuracy

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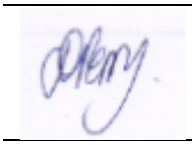
Cornerstone, Hive 2,
1530 Arlington Business Park,
Theale, Berkshire, RG7 4SA

Contact Details

Name: (Agent)	Dianne Perry	Telephone:	07535 932374
Company:	Clarke Telecom Ltd	Fax no:	
Company Address:	Unit E Madison Place Northampton Road Manchester M40 5AG	Email Address:	dperry@perrywilliams.gov.uk
Signed:		Date:	28.02.2023
	Consultant Town Planner	on behalf of Cornerstone	

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