SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Cineworld	Site Address:	Rooftop at Cineworld, The Old Dairy, Victoria Road, Ruislip, HA4 0FY
National Grid Reference:	E: 510937 N: 185627		
Site Ref Number:	96865	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: N/A		
Were industry site databases checked for suitable sites by the operator:	**Yes**	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	27/03/2025
Name of contact:	N/A
Summary of outcome/Main issues raised: A pre-application consultation letter and drawings of the proposal were sent to the Local Planning Authority, by email, on 27/03/2025. No responses have been received to date.	

[1] Macro or Micro

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	
Summary issues raised: The relevant information is being collated and will be distributed accordingly in due course.	

Community Consultation

Rating of Site under Traffic Light Model:	~~Red~~	~~Amber~~	**Green**
Outline of consultation carried out: Pre-application consultation was carried out with the ward Councillors for South Ruislip (Councillors Makwana, Mills and Tuckwell). Pre-application consultation letters and drawings of the proposal were sent to these parties on 27/03/2025.			
Summary of outcome/main issues raised (include copies of relevant correspondence): No responses have been received to date.			

School/College

Location of site in relation to school/college (include name of school/college): No schools or colleges in proximity in line with Code of Practice guidance.
Outline of consultation carried out with school/college (include evidence of consultation): N/A
Summary of outcome/main issues raised (include copies of main correspondence): N/A

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

Will the proposed development be on a civil safeguarding area or a defence safeguarding area?	**Yes**	

Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area been notified?	**Yes**	
Details of response: Notices have been served to Heathrow Airport, the CAA and RAF Station Northolt, by email, on 22/04/2025. Copies of notices and proof of service enclosed.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	Developer's Notice sent via Tracked Email on 22/04/2025. Copy of developer's notice and proof of delivery enclosed.	

3. Proposed Development

The proposed site:

Background

MBNL (Mobile Broadband Network Limited) was established in 2007, and is jointly owned by EE and Three. The application site is required to replace coverage which is currently being provided by an existing site located at Healthline, Braintree Road, HA4 0XE (NGR E: 510716, N: 185669). The site provides coverage for a number of operators including EE Limited and H3G UK Limited.

This site is due to be lost from the network for reasons beyond the operators' control. The loss of an established site from the network can result in a loss of communications and data services locally and wider disruption to the network if a replacement site capable of adequately replicating coverage within that specific area is not identified and integrated into the network at the earliest opportunity.

MBNL need to find a replacement site to ensure connectivity is maintained in the area and to also enable the introduction of 5G, to ensure up to date services are provided to the surrounding residents and businesses in this area of Ruislip.

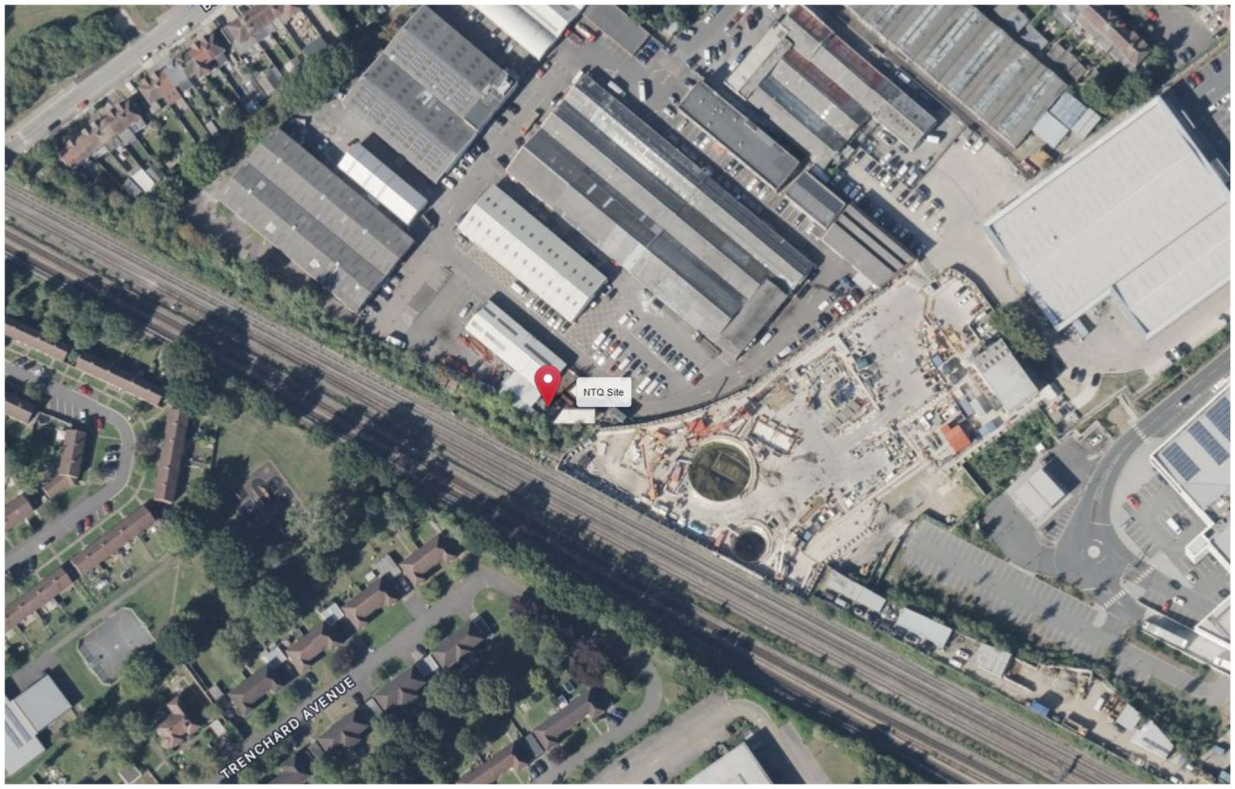


Image 1: The Existing Site (Source: Grid Reference Finder)

MBNL are limited in siting options as there is a requirement to provide equivalent replacement coverage and capacity and new 5G for this area of Ruislip. The replacement of an existing

site usually means that the operator has to be located as close as possible to the existing installation in order to fit in with the surrounding network and to maintain the provision of equivalent coverage and capacity to the surrounding local area.

The Code of Practice for Wireless Network Development in England outlines the requirement to replace sites that will be lost at para. 71:

"71. … the Notice to Quit (NTQ) provisions within code agreements mean that sites have to be relocated. Where NTQs are proposed, the existing coverage and capacity will be removed and as such a replacement site is needed within close proximity to where the existing site was located."

The proposed site is located on the rooftop of Cineworld at The Old Dairy, Ruislip. This is fully in line with the sequential approach outlined in the NPPF and Code of Practice which states that operators should seek to utilise existing structures and buildings before proposing new ground-based installations.

The surrounding area is predominantly commercial. The proposed equipment will be located at the rear of Cineworld/Asda, on the elevation of the building closest to the Asda Petrol Station. The equipment will be visible from ground level; however, it is outside of the natural eyeline of passersby and will be viewed in the context of the height/bulk of the existing building, and the commercial nature of the area. The nearest residential properties are a considerable distance away, on the opposite side of the railway track, with trees to provide screening on both sides of the rail line.

Image 2a: The Application Site

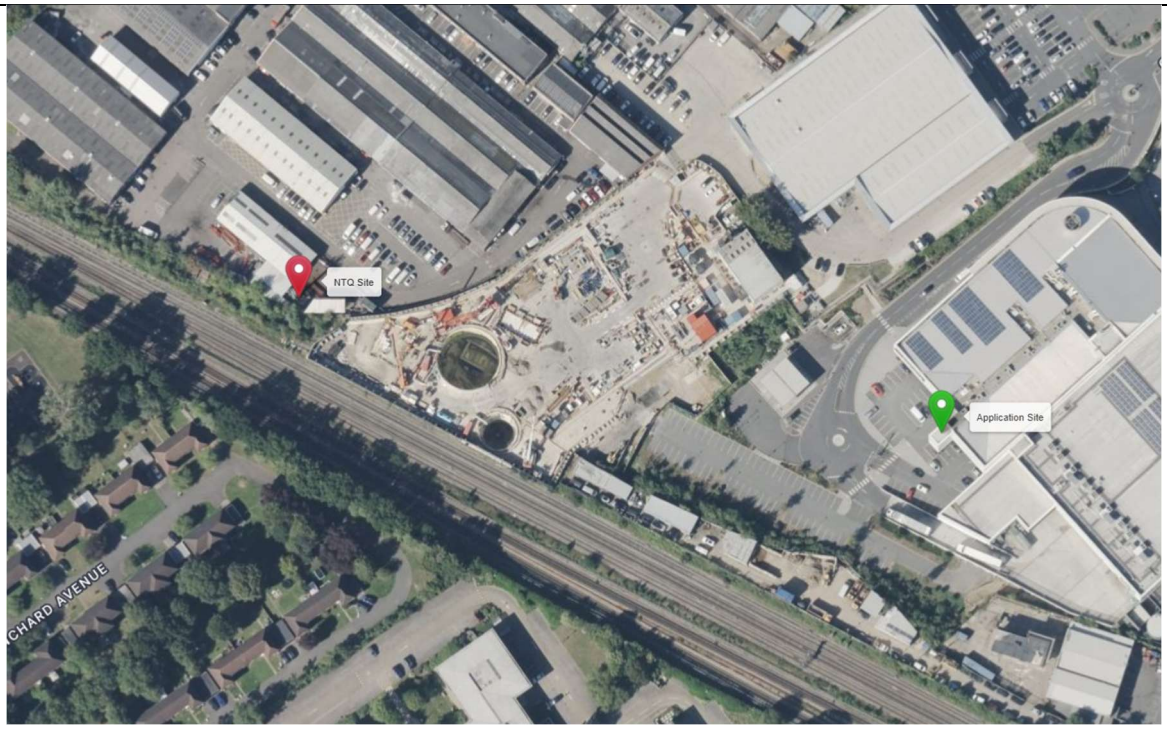


Image 2b: Aerial view of the existing NTQ site (red pin) and the application site (green pin) (Source: Grid Reference Finder)

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

MBNL are seeking to replace the coverage which will be lost following the removal of their existing site which is currently located at Healthline, Braintree Road, to replace and replicate the existing 2G (for EE) and 4G (for both operators) coverage and capacity as well as provide new 5G services to the surrounding area for EE and 3, to ensure high quality customer experience is maintained and up to date technology is provided as demands on the network increase and technologies change.

The 2G provision allows for calls to be made and texts to be sent. 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 4G services into this area would promote activity in line with the general population demand as the ownership of smart devices increases. 5G will deliver unparalleled speeds and capacity, with significantly reduced latency, which will be needed to deliver numerous innovative applications from autonomous cars to Internet of Things.

Type of Structure *(e.g. tower, mast, etc):* *Pole mounted antennas on rooftop*

Description: The installation of 6 no. antennas, 4 no. transmission dishes, 2 no. GPS nodes and 3 no. equipment cabinets located on a new steelwork frame on the rooftop, and ancillary development thereto. Top height of antennas 22.95 metres, height of support pole taken by itself 6.35m.	
Overall Height:	22.95 metres
Height of existing building *(where applicable):*	16.6 metres
Equipment Housing: Link AC Mk5B cabinet	
Length:	0.6 Metres
Width:	1.2 Metres
Height:	1.6 Metres
Equipment Housing: EE BBU cabinet	
Length:	0.7 Metres
Width:	0.65 Metres
Height:	1.1 Metres
Equipment Housing: H3G BBU cabinet	
Length:	0.7 Metres
Width:	0.65 Metres
Height:	1.1 Metres
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Steel – RAL 7035 Grey
Equipment housing – type of material and external colour:	Steel – RAL 7035 Grey

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

The slimline appearance of the proposed antennas and steelwork on the rooftop, at the minimum height possible to provide the necessary coverage/capacity, is the least visually prominent design option available to provide the necessary replacement/enhanced 2G/4G and new 5G coverage and capacity to the surrounding area.

Due to all of the technologies that will be available at this location for two operators (replacement and enhanced 2G for EE only, replacement and enhanced 4G for both EE and 3, and new 5G coverage and capacity for both operators), the proposed top heights of the antennas are essential to enable the antennas to clear the rooftop without clipping and reach the target coverage area. The antennas will exceed the tallest part of the building by 6.35 metres. If the antennas were to be any lower in height, then they would not be able to provide the necessary high quality replacement and enhanced communications coverage which is required for EE and 3 in this busy commercial area of Ruislip.

It is not possible to set the antennas any further back on the rooftop, as the height of the upper roof level is required to ensure that the antennas reach the required height to provide

the necessary coverage and capacity to the area. The lower roof levels are too low to accommodate this. In addition, there is already existing plant (including solar panels) located on the rooftop which restricts potential locations for the installation of telecommunications equipment due to space and ICNIRP requirements. Similarly, face mounted antennas on the building would not be at a sufficient height to provide adequate replacement coverage and capacity.

Any physical object obstructing the propagation of radio signals causes a reduction in the signal strength reaching a customer's device. Generally, the higher the signal frequency, the more it will be impacted by obstruction from "clutter" ie. buildings, trees etc. It is for this reason that the antennas cannot be located within a shroud, as the antennas are less able to propagate through immediate blockages including Glass Reinforced Plastic, which is what shrouds are typically made of. This affects the 5G antennas more so than any other technology, however 4G technologies are also affected more so than older technologies and are therefore less efficient if they are shrouded. As such, the antennas need to remain unshrouded in order to provide adequate replacement/enhanced 2G/4G and new 5G coverage and capacity to the target coverage area.

Given the small scale of the development and its location on the roof of a tall building, the equipment will be out of the natural sight line from ground level. To see the proposed development from many vantage points at ground level, one would have to crane their neck in an unnatural stance. The proposed equipment will be viewed in the context of the building mass and the commercial area in which it is located.

The proposed equipment is to be shared by two operators, EE and H3G ('3'). The sharing of the proposed site is in full accordance with NPPF, which states at para. 119 that the number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum. Without this shared site, each operator would need to seek their own replacement site in the nearby vicinity to address the need to replace the coverage that will be lost following the removal of the existing site at Healthline, Braintree Road. This would lead to the unnecessary proliferation of equipment.

The proposal utilises an existing building, which is in accordance with the sequential approach as set out in the NPPF and Code of Practice. This prevents the need for a ground-based installation in the area.

The proposed height and design represent the best compromise between the visual impact of the proposal on the surrounding area and meeting the multi-technical requirements for the site. Taking all matters into account, it is considered that the proposed installation of telecommunications equipment on the rooftop of Cineworld, Ruislip, to enable the replacement and enhancement of 2G, 4G and provision of new 5G coverage and capacity to the surrounding area of Ruislip, would not appear out of place within its surroundings and would provide enhanced, high-quality, reliable and secure digital connectivity, delivering the capability for a multi-hi tech service shared by two main mobile network operators, and utilising an existing building.

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

International Commission on Non-Ionizing Radiation Protection Declaration enclosed 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, EE and H3G operate their networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of EE and H3G'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.	Yes	

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.		

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.

The National Planning Policy Framework states that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt as set out below the proposed installation is needed for EE and H3G, via MBNL to replace 2G/4G coverage and capacity whilst also providing new 5G services to this area of Ruislip. This follows an NTQ being served by the landlord which means that the existing site that the operators currently utilise to provide their coverage and capacity to the area, at Healthline, Braintree Road (NGR E: 510716, N: 185669), is to be removed from the network.

The area within which an installation needs to be established in order to meet the coverage requirement is constrained by the location and extent of the coverage provided by the original site and other existing installations in the surrounding area.

Without this replacement installation, the area will suffer from a loss of 2G/4G service provision and will not have access to the latest 5G technologies for the operators.

Coverage plots are provided for each operator (EE and 3) to demonstrate that the proposed installation will provide adequate replacement and, in places, improved coverage to the surrounding area.

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)

As explained throughout this statement, the proposed site is required to replace coverage that is due to be lost following the proposed removal of an existing installation at Healthline, Braintree Road. The proposed site will replace coverage for both EE and 3 that will be lost in the area following the removal. This significantly reduces the search area as there is a specific need to provide replacement coverage to the area, as demonstrated in the enclosed coverage plots.

As such, the replacement site needs to be located within the area where the coverage is required, ie. within the existing coverage footprint of the existing site at Mill Lane Trading Estate.

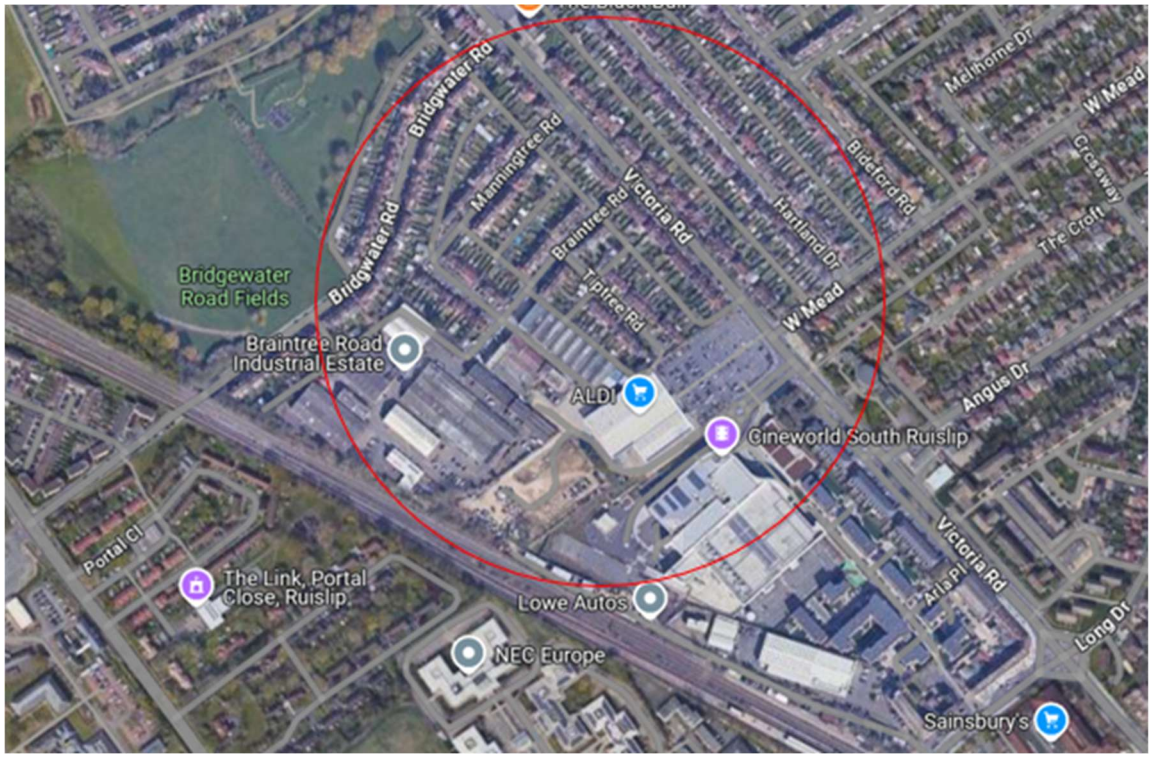


Image 3: Search area

Site Type	Site Address	National Grid Reference	Reason for not choosing site
NTQ Telecoms Site (D1)	Healthline, Braintree Road, London, HA4 0XE	E510716 N185669	This is the current site. The Landlord has served a NTQ, so the site needs to be removed.

Rooftop (D2)	Santok Building, Braintree Road, London, HA4 0EJ	E510698 N185779	There are currently 2 operators on the roof of this building. Due to the location of their equipment on the roof and the orientations of the equipment the building is unable to provide the required coverage and has therefore been discounted.
Rooftop (D3)	Braintree Road Industrial Estate, Braintree Road, London, HA4 0EJ	E510721 N185748	Due to the pitched roofs which are made up of either corrugated steel or another lightweight material, the other buildings on this estate are not suitable for the installation of telecoms equipment as they are unable to hold the weight of the equipment and has therefore been discounted.
Greenfield (D4)	South Ruislip Vent Shaft Main Compound, off Old Dairy Lane, London, HA4 6NP	E510792 N185648	This is a large construction site surrounding the vent shafts and due to the works and the nature of the use of this land, it is not suitable for the installation of telecoms equipment and has therefore been discounted
Rooftop (D5)	Braintree House, Braintree Road, London, HA4 0EJ	E510802 N185784	This is a 2 storey building and therefore is not tall enough to provide the height which is required for the coverage requirement. As such the site has been discounted.
Rooftop (D6)	Premier House, Braintree Road, London, HA4 0EJ	E510818 N185823	This is a 2 storey building and therefore is not tall enough to provide the height which is required for the coverage requirement. As such the site has been discounted.
Rooftop (D7)	Aldi/BM store, Tiptree Road, London, HA4 0EW	E510915 N185746	This is a low, lightweight structure with a slight pitch. The design of the building is such that it cannot support the weight of the required equipment and has therefore been discounted
Greenfield (D8)	Aldi/BM store, Tiptree Road, London, HA4 0EW	E510998 N185810	The car park is very visible in the locality, any free-standing mast in this location will be very prominent and would be looked upon unfavourably by both local residents and the local planning authority and has therefore been discounted.
Streetworks (D9)	Victoria Road Street works, Victoria Road, London, HA4 0EG	E511048 N185806	Whilst there is sufficient space for the equipment to be installed on the pavement it would be very prominent and visible in the locality and due to the height of the building may have issues with ICNIRP compliance and is discounted for this reason.
Streetworks (D10)	Old Dairy Lane Street works, Old	E511040 N185762	There is sufficient space for equipment to be located in this location and it is likely that

	Dairy Lane, London, HA4 0EG		Highways would support an installation in this location, the location does back onto a copse of trees. This would cause ICNIRP issues and therefore a mast of a significant height would be required and this would be upkeeping with the locality and would be very visible. As such this option has been discounted.
Greenfield (D11)	Saint Gregory the Great Catholic Church, 447 Victoria Road, London, HA4 0EY	E511112 N185776	The Church has a long span of flat roof however due to the makeup of the building there would be no ability to make our equipment blend in with the façade and therefore it was determined to not be appropriate and has been discounted.
Rooftop (D12)	Saint Gregory the Great Catholic Church Car Park, 447 Victoria Road, London, HA4 0EY	E511135 N185723	The church has a relatively small car park which is for the exclusive use of the Church and its users. Our equipment would take up significant space in this car park which would have a detrimental impact on the ability of the church to offer parking to those with disabilities and mobility limitations and has therefore been discounted.
Greenfield (D13)	BP garage, Angus Drive, London, HA4 0SB	E511169 N185702	This is a busy fuelling station with underground chambers for the fuel. The other available space here has been used for EV chargers and therefore there is not sufficient space for our equipment so has been discounted.
Streetworks (D14)	Angus Drive Streetworks, Angus Drive, London, HA4 0SB	E511134 N185719	There is a significant amount of scaring on the pavement here so there is not sufficient clear space which is required for our foundations for the mast and cabinets, as such the site has been discounted.
Rooftop (D15)	442-464A Victoria Road, London, HA4 0EX	E511077 N185719	This is a 3 storey block of flats with a pitched roof which is unsuitable to install equipment on and has therefore been discounted.
Rooftop (D16)	466-488 Victoria Road, London, HA4 0EX	E511116 N185678	This is a 3 storey block of flats with a pitched roof which is unsuitable to install equipment on and has therefore been discounted.
Rooftop (D17)	490-512 Victoria Road, London, HA4 0EX	E511165 N185627	This is a 3 storey block of flats with a pitched roof which is unsuitable to install equipment on and has therefore been discounted.
Rooftop (D18)	Arpla Park Development, Arla Road, London, HA4 0FF	E511144 N185564	This is a development of 8 residential blocks of flats but their roofs are all covered with solar panels. As there is no available rooftop space available they have all been discounted.

Rooftop (D19)	Nandos, Victoria Road, London, HA4 0EG	E511026 N185719	This is only a single storey building so does not have the height required to provide the coverage required and has been discounted.
Greenfield (D20)	Crown Cash and Carry, Long Drive, London, HA4 6TS	E511080 N185521	This is a single storey, light weight structure which will not hold the required equipment and due to the nature of the building it is not possible to take any space within their car park without compromising their ability to carry out their business and therefore the location has been discounted
Rooftop (D21)	Middlesex Arms, Long Drive, London, HA4 0HG	E511194 N185484	This is a pitched roof building and therefore cannot support our equipment. This option has therefore been discounted.

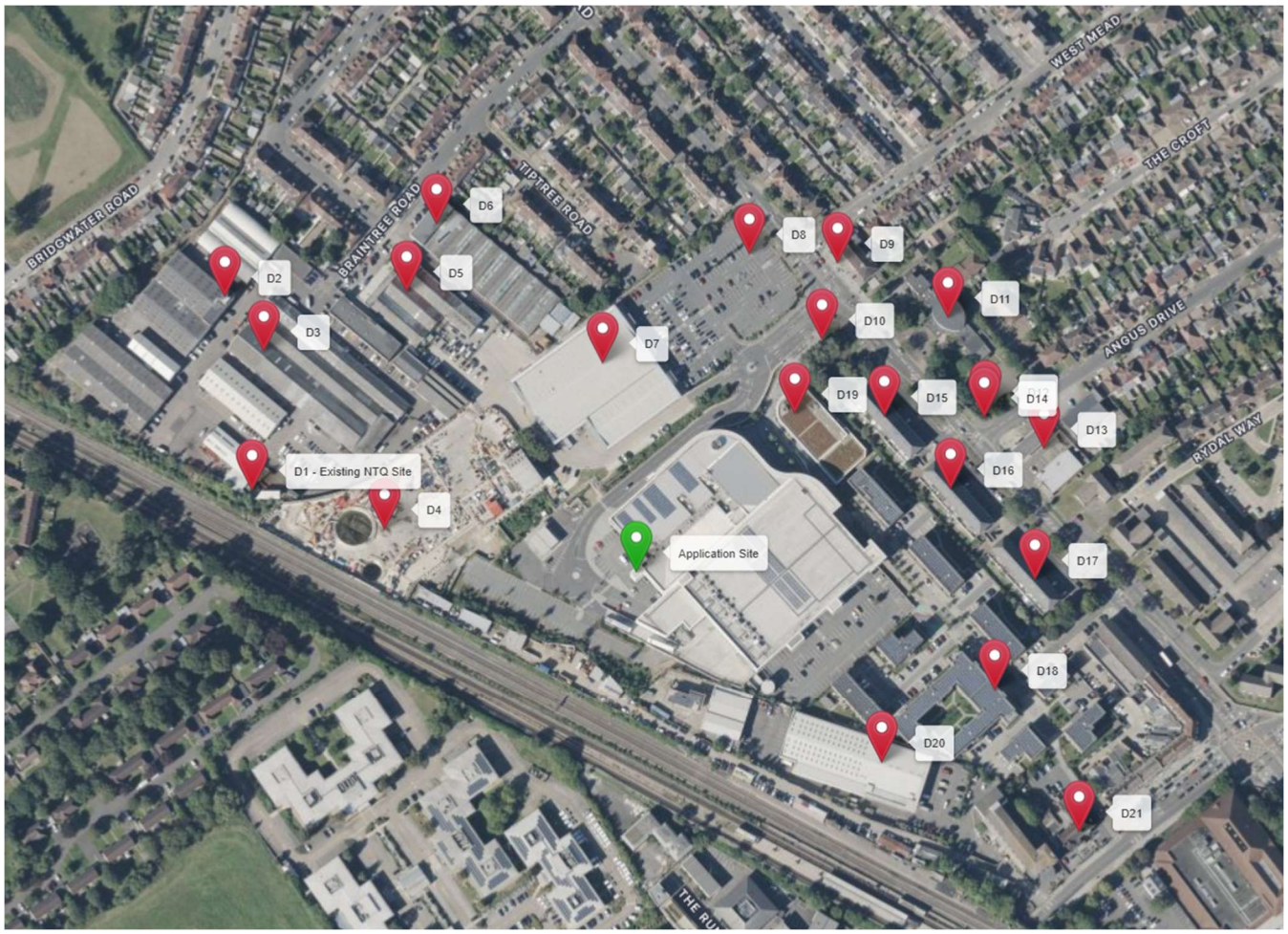


Image 4: Map of discounted options (Source: Grid Reference Finder)

https://gridreferencefinder.com?gr=TQ1071685669|D1_s_-_s_Existing_s_NTQ_s_Site|1,TQ1069885779|D2|1,TQ1072185748|D3|1,TQ1079285648|D4|1,TQ108028578

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

N/A

Land use planning designations:

No planning designations identified.

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

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The NPPF is pro – development with a 'presumption in favour of sustainable development' being seen as a golden thread, running through both plan making and decision taking'.

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

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

National Planning Policy Framework (December 2024)

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The NPPF was updated in July 2021, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. It was most recently updated again in December 2023, in relation to a number of themes including; flexibility for planning authorities in local housing need, clarification of Green Belt boundary alterations and acceptable brownfield development within the Green Belt. It strengthens the importance of building 'beautifully' and respecting the character of an area. It removes the need for annual five-year land supply updates, and protects neighbourhood plans from speculative development for five years. Also, the update encourages community-led and self-build developments and further protects agricultural land in its availability for food production. In December 2024, a further update took place, reversing a number of the previous revisions from December 2023. The update does not

change any parts relating specifically to telecommunications development, other than the paragraph numbers.

The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 119 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

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

The NPPF supports the expansion of telecommunications:

"*Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)…*" (para. 119).

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

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

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

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

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

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

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

Paragraph 86 highlights that Local Development Plans should include policies that facilitate development to meet the needs of a modern economy, including identifying suitable locations for uses such as digital infrastructure. It goes on to confirm that planning policies should:

"Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration."

It also states that they should:

"Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment."

Paragraph 87 states:

"Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for (a) clusters or networks of knowledge and data-driven, creative or high technology industries, and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries." And (c) *"the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience."*

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

The Code of Practice (COP) provides guidance to Code Operators (referred to as 'operators' throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other

relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

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

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

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

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

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

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

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

The COP sets 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 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 COP acknowledges that *'good siting and design principles should apply to all wireless network development and take into account any site specific considerations and context. Both can create better places in which to live and work and help make development acceptable to communities'.*

The Code provides guidance on siting and appearance principles. It sets out several design principles in respect of telecommunications development and acknowledges that the

options for design used by an operator will be affected by site conditions including requirements to link the site to the network, landscape features and coverage and capacity requirements. The guidance includes at Para. 22 *'the choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible'*.

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

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

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

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

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

- **Coverage**: wireless infrastructure needs to provide an appropriate level of coverage over the intended geographical area. This involves ensuring that antennas are elevated sufficiently (often via masts) to provide clear lines of sight for signals.
- **Capacity:** where existing network infrastructure can no longer meet the demand for network capacity in a particular area, additional sites may be required within

that coverage area to meet the demand. This is more likely to be required in densely populated areas or areas of high footfall.

- **Backhaul**: the radio access network requires a connection to the core network. Backhaul is sometimes provided by a microwave link, which requires a clear line of sight between the two ends of the link.

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

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

- Protecting visual amenity
- Mitigating visual impacts

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

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

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

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

Local Policy

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

The Local Plan for the area comprises:

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

The London Plan 2021

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

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

> *'Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:'*
>
> *'… C provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation D seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city'*
>
> *'I support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.'*

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

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

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

> *'…..London is the engine of the UK economy, accounting for more than a fifth of the country's economic output. Its labour market, housing market and transport links are interconnected with the Wider South East city region, which shapes the development of the whole of the UK. Together, London and the Wider South East contribute a full half of the country's output. London has unique strengths in specialist fields like finance, business services, technology, creative industries and law, as well as attracting tourists from around the world, providing a gateway to the rest of the UK. The wealth this generates is essential to keeping the whole country functioning, but the benefits of economic success are not shared evenly within London itself.'*
>
> *'… Projected growth towards 6.9 million jobs by 2041 provides an opportunity to strengthen London's economy for the future, and doing so will depend on increasing diversification. The Central Activities Zone and Northern Isle of Dogs will remain vital to London's economic success, but growth in town centres across London will be equally important, alongside supporting local regeneration, investment in Opportunity Areas and enabling access to a wide range of jobs. Reasonably-priced, good quality employment space will be needed across London to make this happen'.*

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

GG5 'Growing a good economy' states:

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

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

The proposed base station installation is critical infrastructure which will provide world class digital connectivity which will support the digital economy. Reliable mobile digital connectivity supports London's growth, and contributes to the low carbon economy by enabling flexible working amongst other things. In terms of supporting London's role in innovation toward growing a good economy.

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

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

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

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

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

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

Para. 2.4.2 states *'The density, scale and mix of business functions and activities in the CAZ are unique and are underpinned by the connectivity provided by public transport, walking*

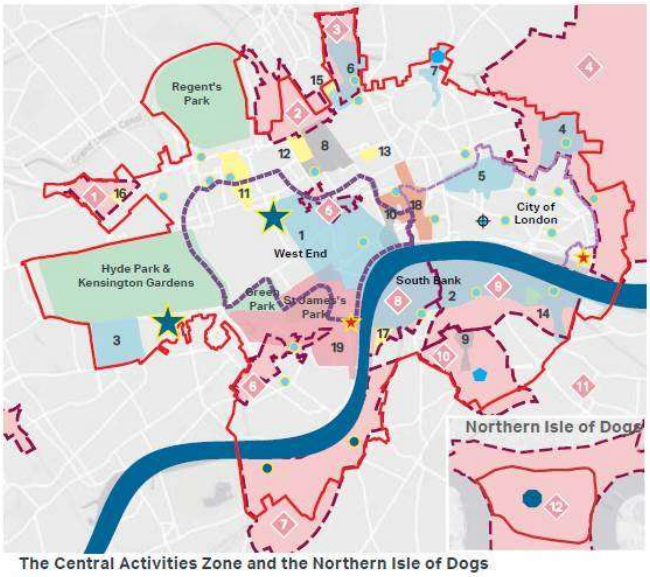
and cycling networks. This agglomeration results in exceptional levels of productivity, which is not replicated elsewhere in the UK, and provides national benefits. It ***requires different or tailored approaches*** *to the application of national policy to address its distinct circumstances'(*emphasis added*)..*

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

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

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

Figure 2.16 - CAZ Diagram



The Central Activities Zone and the Northern Isle of Dogs

- CAZ and NIOD
- St Paul's Cathedral
- World Heritage Site
- Royal Parks
- City of London
- West End
- River Thames
- Opportunity Area

Specialist Clusters

- Academic
- Arts, culture and entertainment
- Health
- Legal
- State

Source: GLA Planning

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Image 2 CAZ diagram

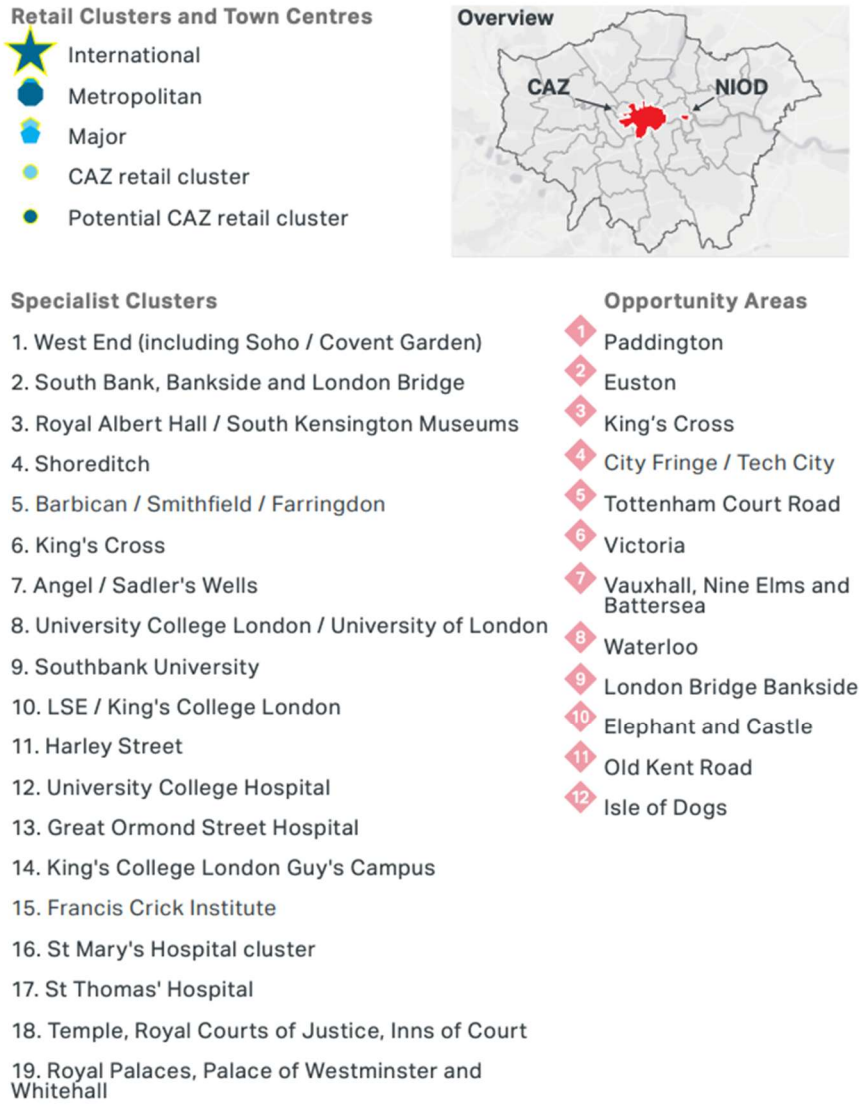

Image 3: CAZ Clusters

Policy E8 relates to 'Sector growth opportunities and clusters'. Para. 6.8.1 states 'The Mayor wants London to continue to provide the best environment in the world in which to do business, so that businesses of all different sizes and sectors can reach their growth potential. This includes supporting business and employment across all sectors of the economy and capitalising on new growth opportunities in emerging sectors…….

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

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

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

Policy SI 6 relates to 'Digital Connectivity Infrastructure'. Para 9.6.1 states that ***'the provision of digital infrastructure is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance**. London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. Fast, reliable digital connectivity is essential in today's economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration'(*emphasis added*).*

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

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

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

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

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 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

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

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

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

Policy DMHB21 relates to 'Telecommunications' and states:

"Telecommunication development will only be permitted where:

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

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

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

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

Hillingdon Council Strategy 2022-2026

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

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

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

UK Wireless Infrastructure Strategy: April 2023

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

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

The Future Telecoms Infrastructure Review, 2018 out the ambition of the Government for the UK to become a world leader in 5G technology and ensuring world class connectivity for all.

This ambition was reaffirmed in the 'UK Wireless Infrastructure Strategy', published in April 2023 which states in the Executive Summary:

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

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

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

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

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

Extraordinary progress is being made on coverage. When I began my role in September 2021, gigabit coverage was just over 50%. Now, it stands at almost 75%. With £1bn of Project Gigabit's funding now available to suppliers, our contracts are not just delivering better internet but skilled jobs everywhere from Blandford to Berwick. By the end of next year, we hope to have every part of our country under contract.

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

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

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

Connected Nations UK Report 2024

The Connected Nations UK Report 2024 was published on 5th December 2024. It provides updated data on the coverage and usage of fixed broadband and mobile networks within the UK, reporting on the further development of 4G networks and progress on the rollout of 5G networks.

The report states that "*the availability of mobile 5G continues to expand, with mobile network operators (MNOs) coverage ranging between 61% to 79% outside premises. However, 5G coverage where all MNOs are present outside premises remains low, at 38% for our High Confidence level. We continue to see significant differences across the UK, with 5G deployed in 42% of sites in urban areas, compared with 16% of sites in rural areas.*"

In relation to 4G technology, the report states:

"*4G remains the primary technology for mobile users, reaching outside more than 99% of UK premises and carries 78% of total mobile traffic data. 4G coverage where it is available from at least one MNO has now reached 95% of the UK landmass (delivering early on one of the key targets for the Shared Rural Network programme), with 4G geographic coverage across individual MNOs in the UK rising from a range of 80-87% last year to 88-89% this year. We note the 4G geographic improvements because of the Shared Rural Network programme.*"

The report also touches upon the phasing out of legacy mobile networks. MNOs have begun phasing out their 3G networks, with two operators having completed the process, and have committed to shutting down their 2G networks by 2033. Over 2 million devices remain reliant on 2G/3G networks, which highlights the need for mobile providers to ensure that their sites are ready for the increased traffic to the more recent 4G/5G technologies.

Online Nation 2022 Report

The 'Online Nation 2022 Report' produced by Ofcom confirms the following:

- UK adults spend almost 4 hours a day online, 3 hours of which are spent on smartphones. (UK young adults (i.e., 18-24 year olds spend approximately 5 hours online and UK adults aged 55+ spend approximately 3 hours online)
- 73% of time spent online/day by UK adults was via a smartphone
- 1 in 5 people use only a smart phone for online access compared with 1 in 10 in 2020

With regards to increased usage of smartphones only for online access the report suggests:

"More people are using only a smartphone to go online. People were more likely in 2021 than in 2020 to only use a smartphone to go online (21% vs 11% in 2020)[2]. There could be many reasons, but this may be because people were spending more time at home in late 2020 and early 2021 than in late 2021, and therefore used a wider range of devices. It may also reflect the larger screen size and better-optimised app functions of many smartphones, making them easier and potentially more cost-effective to use as a sole device for accessing the internet.

The Report goes on to states that:

"In September 2021 73% of the time spent online by UK online adults per day was on a smartphone. UK online adults are also spending slightly more time using tablets than computers, demonstrating that there is a clear preference for using mobile devices to go online. Those aged 25 to 34 spend the highest proportion (85%) of their online time using a smartphone, followed by 35-44s (80%); 15-24s (78%); 45-54s (74%) and those aged 55+ (55%).[3]"

Therefore, without the replacement and improved network coverage and capacity that the proposed essential infrastructure will bring, EE and H3G's network users living, working and travelling in the local area will not benefit from reliable mobile digital connectivity when using their smartphones for business, education and personal purposes.

Levelling Up the United Kingdom (February 2022)

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.

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[2] Ofcom Adults' Media Literacy Tracker 2021: Core survey IN1. Which of these devices do you use to go online? (single coded) Base: All adults aged 16+ who go online at home or elsewhere (excluding those who did not give a response at the postal survey) – 3,577

[3] Ipsos, Ipsos iris Online Audience Measurement Service, 1 September–30 September 2021, adults age: 15+, UK. Note: Custom data supplied by Ipsos.

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

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

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

'The UK Government has made progress towards spreading opportunity around the country since 2019, alongside mitigating the worst effects of the pandemic, with: • £5bn for Project Gigabit to bring gigabit-capable broadband to 85% of the UK by 2025, and the £1bn Shared Rural Network deal with mobile operators delivering 4G coverage to 95% of the UK by the end of 2025; • five-year consolidated transport settlements amounting to £5.7bn in eight city regions outside London, £5bn of funding for buses and active travel over this Parliament; and £96bn for the Integrated Rail Plan delivering faster, more frequent and more reliable journeys across the North of England and the Midlands;

Levelling up is not about making every part of the UK the same or pitting one part of the country against another. Nor does it mean dampening down the success of more prosperous areas. Indeed, by extending opportunity across the UK we can relieve pressures on public services, housing and green fields in the South East. And levelling up can improve well-being in the South East by improving productivity in the North and Midlands. So, it is about the success of the whole country: realising the potential of every place and every person across the UK, building on their unique strengths, spreading opportunities for individuals and businesses, and celebrating every single city, town and village's culture. This will make the economy stronger, more equal and more resilient, and lengthen and improve people's lives. The economic prize from levelling up is potentially enormous. If underperforming places were levelled up towards the UK average, unlocking their potential, this could boost aggregate UK GDP by tens of billions of pounds each year. Levelling up skills, health, education and wellbeing would deliver

similarly-sized benefits. Accumulated over time, those gains could easily surpass annual UK GDP. Success in levelling up is about growing the economic pie, everywhere and for everyone, not re-slicing it.

The United Kingdom's Geographical Disparities: Drivers and Potential Policy Approaches What does the economic and social geography of the United Kingdom look like? The UK has larger geographical differences than many other developed countries on multiple measures, including productivity, pay, educational attainment and health. Urban areas and coastal towns suffer disproportionately from crime, while places with particularly high levels of deprivation, such as former mining communities, outlying urban estates and seaside towns have the highest levels of community need and poor opportunities for the people who grow up there. These disparities are often larger within towns, counties or regions than between them. They are hyper-local and pockets of affluence and deprivation may exist in the same district. Indeed, many of the worst areas of deprivation are found in the UK's most successful cities. While change is possible, in some cases, these differences have persisted for much of the last century. And some of the UK's most successful cities – such as Birmingham, Manchester, Leeds, Glasgow and Cardiff – lag behind their international comparators when it comes to productivity and incomes. What are the current and future drivers of geographical disparities? Over the past century, many trends have combined to create the spatial patterns seen across the UK today. Globalisation, technological progress, advances in transport, logistics and power, and the shift from heavy industry to knowledge-intensive sectors, as well as the rise of foreign holidays and shift from technical training to university education, have had a large and lasting impact on the economic geography of the UK. These dynamics of the global economy have benefited the UK overall, improving productivity, increasing wealth and driving up living standards through more innovation and competition. These dynamics, however, have not had the same positive economic and social impacts across the UK. While London and much of the South East have benefited economically, former industrial centres and many coastal communities have suffered. This has left deep and lasting scars in many of these places, damaging skills, jobs, innovation, pride in place, health and wellbeing. What are the factors that will help drive levelling up? Levelling up requires a focused, long-term plan of action and a clear framework to identify and act upon the drivers of spatial disparity. Evidence from a range of disciplines tells us these drivers can be encapsulated in six "capitals".

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

This White Paper sets out that the new policy regime is based on five mutually reinforcing pillars. Firstly, the UK Government is setting clear and ambitious medium-term missions to provide consistency and clarity over levelling up policy objectives. These missions will serve as an anchor for policy across government, as well as catalysing innovation and action by the

private and civil society sectors. These missions are ambitions that the UK Government has for all parts of the UK. Delivering on them, while being fully respectful of the devolution settlements, will require close and collaborative work with the devolved administrations. The missions are rolling decade-long endeavours and will be reviewed periodically by the UK Government. One mission relates to:

> ***"Digital Connectivity Mission: By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population" [emphasis added].***

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

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

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

The case for 'Digital Connectivity' action states:

> *'The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation. Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working. However, there are significant spatial disparities in the quality of broadband and mobile networks, with rural areas likely to experience worse digital connectivity than urban areas. Infrastructure is only part of the picture: economic benefits will only materialise if businesses and workers have the skills to take advantage of improved infrastructure.*
>
> *More broadly, high quality digital infrastructure can deepen local labour markets through remote working, making it more attractive for both workers and companies to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive growth and jobs in new areas. Existing specialisms in the UK regions have the potential to generate strong tech clusters, such as fintech in Scotland and Wales, e-Commerce in the North West and Northern Ireland, and Agri-Tech in Yorkshire and the Humber. The sector also provides opportunities for raising living standards – median earnings for the sector are 50% higher than the UK average.*

The policy programme for 'Digital Connectivity' states:

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

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

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

5G has the potential to radically change the way people live and make businesses more productive and competitive. *The UK Government's ambition is for the majority of the population to have access to a 5G signal by 2027. Since 2017, the UK Government has provided £200m in funding for 5G Testbeds and Trials, supporting over 200 startups and SMEs across a range of sectors – including healthcare, manufacturing, Agri-Tech and creative industries – to better understand how to use the technology to develop new solutions and services (emphasis added).*

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

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

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'*.

Planning Issues

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

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

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

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

> '*The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established* (emphasis added). *Where no specific procedure is provided in the 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 design of the proposed equipment has been carefully considered. To this end, the operators have chosen the most sensitive design available to them that will provide the required levels of replacement and enhanced coverage and capacity, and new 5G coverage, to the target coverage area in this busy part of Ruislip. The proposed height is the minimum required to ensure ICNIRP compliance whilst providing the required levels of coverage.

Technical requirements have dictated the siting of the proposed equipment. The operator has spent a considerable amount of time identifying a potential site, and the proposed location is considered to present the best balance between operational/technical requirements and environmental impact. As explained throughout this statement, the proposed site is required following the impending loss of a site that the operators currently utilise at Healthline, Braintree Road. The need to locate the site in the area where the coverage is needed is acknowledged in the Code of Practice.

The proposed equipment fully complies with the objectives of the NPPF. Government guidance states that in order to minimise the visual impact of telecommunications equipment, existing buildings should be utilised where possible in preference to installing new ground based apparatus. In this instance, it is possible to utilise the existing Cineworld building. The proposed site will also be shared by both EE and 3, which minimises the overall number of sites consistent with the efficient operation of the network. This is in full accordance with the sequential approach as set out in the NPPF and Code of Practice.

The proposed equipment is sited on a part of the rooftop which is at the rear of the building, where there are less sensitive visual receptors compared to at the front of the building which is visible from a much wider area.

As established in Policy SI6 of the London Plan, connectivity to communications networks is a vital component in social and economic life. Policy SI6 also advocates for coverage to be replaced where it is lost. The proposal fully complies with this aspiration.

Appearance

MBNL has carefully considered the design of the new proposed installation and are proposing the most sensitive design currently available to provide the necessary replacement

coverage, enhanced capacity and new 5G services to the surrounding area. The antennas are proposed at the lowest height possible to provide optimum coverage and capacity to the target coverage area whilst also ensuring that the site remains ICNIRP compliant. If the antennas were to be any lower, they would not be able to transmit effectively and coverage/capacity in the area would not be adequately replaced. There would also potentially be issues on the rooftop for ICNIRP with clipping on the roof edges. As such, this would fail the operators design brief and an additional installation would have to be found elsewhere, leading to the proliferation of masts contrary to national planning guidance contained in the NPPF.

The siting of the proposed equipment, at the rear of the building, and at a height which is out of the natural eyeline of passersby at ground level, will help to minimise the visual impact of the proposal. Where the equipment will be visible, from the car park area to the rear of Cineworld, it will be viewed in the context of the building height, the car park itself and the nearby petrol station.

The replacement installation will enable the operator to provide a high-quality service to its customers and access to the latest 4G and 5G technologies, in full accordance with the aspirations of the NPPF which supports the roll-out of high quality, reliable digital connectivity.

MBNL have designed the proposed site in such a way that it is able to meet technical requirements whilst also minimising, so far as practicable, the visual impact on the surrounding area. It is not considered that the proposed installation will have an unacceptable impact on the visual amenity of the area.

Lack of Coverage – Material Consideration

The proposed installation is significant to enable continuous coverage of the telecommunication network, ensuring that this area of Ruislip gets the mobile coverage it needs. 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. It will allow the area to access 5G services for both operators, following an NTQ being served on the operators in regards to their existing site at Healthline, Braintree Road, HA4 0XE (NGR E: 510716, N: 185669), ensuring that local residents, businesses and visitors have adequate indoor service provision.

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 the proposed radio base station, the operator's customers will suffer from a loss of coverage and capacity following the loss of the existing site at Healthline, Braintree Road, HA4 0XE (NGR E: 510716, N: 185669). Customers will also not be able to access the 5G network, and due to lack of capacity as the number of users increase, would experience increasing

numbers of dropped calls and buffering, leaving them unable to access the internet on their handheld devices.

The proposed radio base station is in full conformity with the NPPF. The proposals will promote the enhanced connectivity of the area, by providing infrastructure for high speed telecommunications. Indeed, high quality telecommunications is often seen as the fourth utility service.

The proposed installation will help improve the area's economic prosperity, strengthen the urban economy 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 emissions. The radio base station will 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.

Economic and Social Benefits

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

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

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

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

Paragraph 38 of the revised NPPF states that:

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

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

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

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

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

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

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016 (https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-

assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-(1).pdf.aspx). 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 maintaining and enhancing high quality 4G coverage and capacity and introducing 5G connectivity in this busy part of Ruislip where the social and economic benefits will outweigh the environmental considerations.

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

There have been numerous appeal decisions where the Inspector has attached significant weight to the benefits, alternative options, technical constraints and NPPF in a balancing exercise of all the valid material considerations, including visual impacts.

In March 2020, the decision of Birmingham City Council to refuse planning permission for a proposed telecommunications site was overturned by the Planning Inspectorate (APP/P4605/W/19/324191). Within the decision notice, the Inspector stated:

'In this case, the proposed development would result in harm to the visual amenity of the area, with particular regard to the proposal's scale and siting. As such, conflict would arise with Policy PG3 of the Birmingham Development Plan insofar as the development would not reinforce local distinctiveness with a design that responds to site's conditions and the context of the local area. However, I conclude that this harm would, on balance, be outweighed by the economic and social benefits that would stem from the proposed upgrade which would not be realised whilst reducing the height of the mast. Therefore, in the round, the proposal would accord with saved UDP Policies 8.55 and 8.55A-

C, the SPD and Framework paragraphs 112 and 113. Collectively, these seek to support the expansion of shared next generation mobile technology to create a modern, high quality and reliable communications infrastructure that is essential for economic growth and the life of the local community'.

In relation to the replacement of existing coverage in particular, there have been a number of appeal decisions where the Inspector has heavily weighed the need to ensure coverage is not lost against any perceived visual harm.

An appeal decision for a site in Winchester (Andover Road) (PINS ref APP/L1765/W/18/3197522) addressed the significant weight that should be placed on NTQ replacement sites, stating:

"I attach significant weight to the public benefit arising from the continuation of local service provision… Having regard to all relevant considerations, including national planning policy and the potential availability of alternative sites, my findings are that the proposal's public benefit in maintaining and enhancing local telecommunications coverage and capacity would outweigh the limited harm arising to the character and appearance of the area."

An appeal decision for a site in London Borough of Harrow (PINS ref APP/M5450/W/21/3287882) took a similar approach, stating:

"I have also found that there is a clear need for the development in this location in order to sustain and enhance communications infrastructure within the area. The evidence before me indicates that there is a lack of reasonable alternative sites within the area which would provide the required coverage. I am also convinced that, should the proposal not go ahead and the existing equipment be removed, the quality of communications services within the area would be seriously deficient. I also recognise the benefits associated with improved communications infrastructure within the area which would not otherwise be achieved… in my view, and with regard to the specific circumstances which are present in this case, the benefits of the scheme would outweigh the harm which would be caused to the character and appearance of the area."

On the 29th November 2024, Sir Chris Bryant MP wrote a letter to Council Leaders and Council Chief Executives across the UK in support of digital infrastructure deployment. This letter demonstrates that the Government still consider digital infrastructure to be a high priority.

The letter, entitled '*Supporting digital infrastructure deployment in your local area*' confirms the importance of fast and reliable connectivity to our everyday life, as people increasingly rely on their devices to work, learn and stay connected with each other, demand for greater speeds and more reliable connectivity is growing. Better digital connectivity is also key to delivering faster economic growth and increasing social inclusion. The Government is commitment to supporting the delivery of next-generation connectivity across the UK by driving towards nationwide 5G coverage by 2030. The letter requests help from Councils across the UK to achieve these goals by prioritising digital infrastructure and focussing on a number of areas that remain a challenge to telecoms investment.

The letter points out that 'early participation from local planning authorities can speed up telecoms deployment' and urges Councils to have early and strategic discussions with mobile operators to move applications more quickly through the planning system and help improve mobile coverage and capacity. There is a specific ask in the MP's letter that Councils 'support the deployment of communications infrastructure wherever possible' .

The manufacturing, construction and agricultural sectors were 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.

The delay in gaining planning approvals for digital infrastructure is such that the Prime Minister, Sir Keir Starmer, wrote in The Times on 5th December 2024:

> "*Good homes need to be supported by good infrastructure… Every road, pylon* ***and mast*** *– which connect people to opportunity – must jump through endless hoops, only to be opposed, dragged out, before eventually, if lucky, approved.*" [emphasis added]

The proposed installation in this location will allow the operator to provide new and improved high quality 2G/4G/5G coverage and capacity to the Ruislip area, 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.

Summary

MBNL are in the process of progressing a suitable replacement site in the Ruislip area for a radio base station to ensure reliable mobile digital connectivity is provided for residents, businesses and visitors. As part of EE and 3's continued network improvement program, there is a specific requirement for a replacement installation at this location to provide equivalent and improved 2G (for EE), 4G coverage and capacity as well as new 5G services for EE and 3, ensuring that this area of Ruislip has access to the latest technologies. The replacement site is required following an NTQ being served on the operators in relation to their existing site at Healthline, Braintree Road, HA4 0XE (NGR E: 510716, N: 185669). The existing site will be lost from the network and the operators are therefore seeking a replacement site in order to mitigate for the loss of digital connectivity, in full accordance with Policy SI6 of the London Plan.

The proposed design and height of the proposed antennas is essential in order for the antennas and dishes to be able to reach the target coverage area, to maintain and provide high quality replacement 4G and new 5G service provision to this part of Ruislip. This will fully meet the national Governments aim of '*ensuring that everyone is connected to the information superhighway*' and the national policies set out in the NPPF. If the height of the antennas were to be reduced then the antennas would not be able to operate effectively,

and the transmission dishes would not be able to achieve a clear line of sight, leading to a degraded service for the operator's customers especially for the higher frequency technologies including the latest 4G technology and 5G service provision. It would also cause issues with ICNIRP for clipping on the roof edges, which is a non-negotiable for the operators. This is therefore the absolute minimum height required.

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

The social and economic benefits of providing continued reliable and high quality mobile broadband connections including 5G support sustainable growth meeting the needs of the population and strengthening global competitiveness. This is fully supported by the NPPF, UK Wireless Digital Infrastructure Strategy, the London Plan and the Hillingdon Local Plan. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area.

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