Supplementary Information Form

1. Site Details	
Site Name	Bullard Road
Site Address	Bullard Road, London Borough of Richmond upon Thames, London, TW11 0DA
NGR	E: 515578 N: 170648
Site Number Ref	RUT20336
Site Type[1]	Macro

2. Pre Application Check List		
Site selection		
Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	~~Yes~~	**No**
If no, please explain why: No register available		
Was the industry site database checked for suitable sites by the operator?	**Yes**	~~No~~
If no, please explain why: As will be discussed in further detail within this statement, a new base station is required at this location to provide brand-new operator coverage within the local area for Three UK. As such, no other, existing site offers a viable option to provide the necessary coverage.		
Annual Area Wide Information to local planning authority		
Date of information submission to local planning authority	Not requested by the LPA	
Name of contact	NA	
Summary of issues raised: Rollout plans can be provided upon request		
Pre-application consultation with local planning authority		

[1] Macro or Micro

Date of written offer of pre-application consultation	16th June 2022		
Was there pre-application contact?		~~Yes~~	**No**
Date of pre-application contact	NA		
Name of contact	NA		
Summary of outcome / main issues raised: A pre-application consultation letter was issued to London Borough of Richmond upon Thames Council, and the Council's Highways Department, on 16th June 2022. This letter contained details of the proposed installation, as well as design drawings. Feedback was requested from both parties. As of the date of this planning application, no formal response has yet been received from the Local Authority or the County Highways Department.			
Ten Commitments Consultation			
Rating of Site under Traffic Light Model	~~Red~~	~~Amber~~	**Green**
Outline Consultation carried out: A pre-application consultation letter was issued to the local Ward Councillors of the Teddington Ward. General Arrangement drawings of the proposal were provided alongside the consultation letter and feedback was requested.			
Summary of outcome / main issues raised: As of the date of the submission of this application, no response has yet been received from any Ward Councillor, or any local resident.			
School / College			
Location of site in relation to school / college (include name of school / college): Leyf Bushy Tails Nursery and Pre-School is situated approximately 100 metres from the application site.			

Outline of consultation carried out with school / college (include evidence of consultation): A pre-application consultation letter was issued to: • Leyf Bushy Tails Nursery and Pre-School, London Early Years Foundation, 121 Marsham Street, London, SW1P 4LX		
Summary of outcome/main issues raised (include copies of main correspondence): As of the date of this planning application, no formal response has yet been received from the above establishment.		
Civil Aviation Authority / Secretary of State for the Defence / Aerodrome Operator consultation (only required for an application for prior approval)		
Will the structure be within 3km of an aerodrome or airfield?	~~Yes~~	**No**
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified	~~Yes~~	**No**
Details of response: NA		
Developers Notice (only required for an application for prior approval)		
Copy of Developers Notice enclosed	**Yes**	~~No~~
Date served	30th June 2022 – Proof of Delivery of Developers Notice included within the application	

3. Proposed Development

The proposed development is required to improve local H3G mobile coverage, provide brand-new 5G coverage and connectivity, and become an integrated part of the Operator's network within the Council area. The expectations are that future telecommunications technology will support Central Government policy regarding digital inclusion; improvements in health and social care; assisting in local economic growth; advancing the development of Smart Cities; and supporting innovative uses throughout the transport sector for both personal and public travel.

The Site:

The proposed development will be located on the extended footpath at the junction of Queens Road and Bullard Road, London Borough of Richmond upon Thames, London, TW11 0DA (E: 515578 N:170648) Hereafter referred to as, 'the Site'.

Figure 1 shows the approximate location of the Site which sits within the same footpath to, existing lampposts and street furniture.

Figure 1 – Aerial imagery of proposed site (approximate site demarcated by red drop pin) (Google Maps 2022)

The Site has been chosen as the most viable town planning solution within the area which will meet the necessary coverage requirements of the Operator. The proposed development will ensure continued mobile network coverage in provided to the surrounding area; providing connectivity, capacity and coverage for local residents and businesses and ensuring the next step in technological progression (i.e. 5G network coverage) is available within this part of Teddington (Council area).

The application site, on an extended pedestrian footway, adjacent to Bullard Road, provides an appropriate town planning solution and will ensure that excellent network coverage is provided to the wider area.

The existing streetlights situated along Bullard Road, as well as road traffic signs, provide vertical engineered elements within the local area. The mature hedge, palisade fencing and gatepost columns situated behind the application site will assist in filtering medium- and long-range public views of the proposed apparatus, as well as providing a backdrop to views of road-users travelling north-south along the Queen's road. It is hereby submitted that the application site is appropriate and could sufficiently absorb the apparatus into the locality.

The scheme proposes the installation of a 15 metre-high monopole with 'stacked' antennas (i.e. no shrouded headframe) for Three UK. This installation will provide 3G, 4G and 5G coverage for H3G (Three UK). Given the level of public reliance on mobile networks, which has increased to an unprecedented level since March 2020, the scheme is considered wholly appropriate for the local area and will ensure that connectivity is improved within the immediate vicinity and surrounding area. Public reliance on established mobile networks, and the increase in mobile data consumption, will be discussed in more detail within this document, with particular focus on social interaction and the opportunity for large scale 'home-working' as has become relatively normal over the last two and a half-years.

Innovative design now allows the antennas to be 'stacked' within a slimline column, rather than being attached to the upper section of the monopole and creating a larger visual impact on the wider streetscene. The proposed monopole is the slimmest solution available to the Operator for deployment.

Whilst the applicant accepts that the height of the installation will result in a visually intrusive feature on the landscape, the slimline nature of the development will ensure that the visual impact is reduced as far as practicable. When this impact is assessed against the provision of economic, social and environmental benefits that will be brought forward by the proposal, there is considered to be significant favour towards approving the scheme. The justification for the height of the proposed installation is that the next stage of technological advancement (5G) will be available from this network cell, providing new cutting-edge coverage for Three UK to the local area.

The proposed apparatus only serves **one** function – to provide mobile network coverage to the local area. The equipment has no other function. As such, the appearance of the equipment, and the height of the equipment, is dictated by functionality and technical constraints. Indeed, the further relaxation of Permitted Development rights by Central Government in early 2022, shows a clear indication that 20m is now the accepted height for new base stations situated on highways land and immediately adjacent to the public highway. It should also be noted that this juncture that the associated ground-based equipment cabinets qualify as outright Permitted Development.

The 'siting' of the proposed development has been carefully selected – set away from residential properties, as far as practicable, and adjacent to a busy road, with a focus on reducing any perceived visual impact associated with this application to the maximum extent.

It is considered that the proposal in front of the Council is acceptable, as this development will ensure local network coverage is improved at a time where it is becoming apparent that a significant proportion of the national workforce are opting to adopt a more hybrid-style of working – with many returning to an office environment for only a small proportion of the regular working week. As such, the necessary infrastructure must be deployed in order to assist with this hybrid working, with this typically occurring in a predominantly residential setting. The local community, at Teddington, will therefore be at the forefront of the next generation of technology (5G) roll-out.

Given the need to introduce a new permanent base station into the local area, it is considered that the best town planning solution has been brought forward as part of this application.

Ensuring that current network coverage is improved and enhanced is of vital importance, never more so than over the last two and a half years when the country moved towards an increased level of home-working, it is imperative that the public need is met by the Operators. This is a view which is also taken by Central Government, and is clear in their relaxation of Permitted Development rights for the second time in 5 years – firstly in 2017, and then again, more recently, in 2022.

It is considered that the proposal in front of the Council is acceptable. This development will ensure that continuous network coverage is provided to the local area for Three UK and it is therefore considered that any visual impact caused by this proposal is greatly outweighed by the public economic, social and environmental benefits of ensuring that brand-new 5G coverage is provided to the wider area.

Enclose map showing the cell centre and existing sites within the cell and adjoining cells:

This can provided upon request

Type of Structure (e.g. tower, mast, etc):

Description:

The proposed development includes for the installation of a new 15m monopole tower to support antenna, associated radio-equipment housing and ancillary development hitherto.

Overall Height: 15m

Height of existing building (where applicable)	NA metres

Equipment Housing:	Width (mm)	Depth (mm)	Height (mm)
1	600	500	1585

2	650	700	950
3	1900	600	1752

Materials (as applicable)

Tower / mast etc. – type of material and external colour	Steel – Grey (RAL7035) (unless otherwise suggested by the Local Authority)
Equipment housing – type of material and external colour	Steel – Grey (RAL7035) (unless otherwise suggested by the Local Authority)

Reasons for choice of Design

In designing this telecommunications installation, the applicant has sought to achieve a balance between the technical requirements of the Operator and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree.

The application proposes to install a 15-metre-high telecommunications monopole with 'stacked' antennas and associated ground-based equipment cabinets. This proposed telecommunications site will service the Teddington area of Richmond.

The choice of design at the application site is governed by two main factors; the context and visual amenity of the area; and, the technical requirements.

<u>Technical Objective and Technical Requirements</u>

The objective of this site is to ensure permanent network coverage to the local area. The proposed apparatus will provide improved connectivity, capacity and coverage to the area, thereby increasing mobile upload and download speeds, and a more reliable mobile network connection. The required improvements can only be provided by the installation of a new base station, rather than the upgrading of any existing base station.

By way of background information, in designing a radio base station it is necessary to incorporate certain vital elements and to work around a number of technical constraints. There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signal(s), the supporting structure that holds the antennas in the air (or fixes them to a building or structure) and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units).

Other elements necessary for the base station to function are the power source (a meter in a cabinet or a generator on sites where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas, link dishes and the various support structures, grillages and fixings, often referred to in general terms as "development ancillary to" the base station.

The antenna height is determined by a specialist network radio engineer using specialist software which factors in the area that coverage is required; the relationship between the

selected site location and existing cell sites in the linked network; and variances in land levels and elements such as nearby trees or buildings, which can block or weaken signals.

3no. equipment cabinets are required to house the radio equipment and will be positioned in a neat arrangement at ground level. The cabinets are required to be located in close proximity to the mast to minimise unnecessary cable lengths and reduce the associated electrical losses.

Visual Amenity

The applicant gives due regard in designing all new sites to limit the visual impact through good design. In this instance, the proposed installation is subject to technical and build constraints. That notwithstanding, it is submitted that the appropriate siting and design put forth will mitigate any potential impact on the site and its surroundings to an acceptable level.

To achieve the required coverage and overall network improvement for H3G, a 15-metre-high slimline monopole is required. The proposed installation will also be 5G ready at the point of deployment, with the structure capable of accommodating the necessary apparatus 'within' itself, thereby avoiding the need to deploy a structure with a wider headframe, or a traditional 'bubble' headframe. This innovative design is therefore the smallest and slimmest available to the Operator and has been selected to ensure that any perceived visual impact is reduced as far as practicable. The application site also ensures that the installation will be situated close enough to the target area it is designed to serve. This is a very important factor and must be acknowledged by the Local Planning Authority.

Whilst the application site will provide a suitable technical solution for the local area, it is also considered that this location offers an appropriate town planning and environmental solution. The bulk and scale of the proposed equipment has been minimised as far as practicable, with the antennas 'stacked' within the structure itself. The apparatus has only **one** function – to provide network coverage to the local area. Its design, therefore, is solely dictated by operational functionality. The height of the antennas has been reduced to the lowest which would provide the required level of replacement coverage.

As this site will be deployed with 5G capability, this application is not to simply ensure that the local area will be serviced with the same level of network coverage as much of the Local Authority area (i.e. 3G and 4G), but that it will actually surpass the current level of 'standard' coverage and connectivity with the provision of 5G coverage.

Whilst the applicant accepts that there will be some level of visual impact, when this is compared to the numerous social and economic benefits which will be brought forward with the proposal, it is considered that the application should be deemed acceptable, and therefore receive Officer support.

The applicants encourage the Council to make a clear distinction between 'visibility' and 'harm', when assessing this proposal. At 15 metres in height, the structure will be visible. However, being able to see something does not immediately infer that it is either inappropriate or harmful. The applicants submit that, despite the proposed development being visible, it is not harmful, and that the height of the apparatus is solely dictated by its function. This must be acknowledged by the Council.

As outlined in the General Permitted Development Order, the deployment of mobile phone base stations, up to a height of 20 metres, is accepted in principle by virtue of the legislation. This position has been confirmed by the Planning Inspectorate in a number of appeal decisions.

For example, in allowing appeal APP/E2205/W/20/3261389, which proposed the installation of a 20m-high telecommunications monopole and associated ground-based equipment cabinets, the Inspector included the following in their decision notice:

> *"Part 16 of the Order establishes that* ***the proposal is permitted development*** *and therefore it is accepted in principle by virtue of the legislation****. Furthermore, there is no requirement to have regard to the development plan as there would be for any development requiring planning permission.*** *Nevertheless, Policies SP1, SP6 and ENV13 of the Ashford Borough Council Local Plan to 2030 are material considerations as they relate to issues of siting and appearance. In particular, they seek to secure high quality design and to avoid development that would cause loss or substantial harm to the significance of heritage assets.* ***Similarly, the National Planning Policy Framework is also a material consideration and this includes a section on supporting high quality communications"*** *(emphasis added).*

In another example, in allowing appeal APP/G4240/W/18/3201704, which proposed the installation of a 20m-high telecommunications monopole and associated ground-based equipment cabinets, the Inspector included the following in their decision notice:

> "**The permission granted under the GPDO is equal to an outline planning permission** and the consideration of the proposed development is limited to its siting and appearance, not the principle of the development" (emphasis added).

Due consideration has been given to the process and the proposal put forward is the best available option – it both achieves the technical requirements and does not bring unacceptable harm to the character of the area.

It is anticipated that this installation will become an accepted part of the built environment over time – as is the case with other established street furniture within the area, and specifically on Bullard Road.

Whilst it is accepted that the structure will be visible, it is considered that the economic, social and environmental benefits brought forward by retaining network coverage across the local area outweighs any harm that the proposal may cause.

It is considered, overall, that the design is appropriate to the site and surrounding area and avoids any unacceptable level of impact.

4. Technical Information		
International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)* International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, Hutchison 3G (UK) Limited operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of Hutchison 3G (UK) Limited's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.	**Yes**	~~No~~
Frequency	GSM 1865.5-1846.5 MHz	
Modulation characteristics[2]	GMSK & QPSK	
Power output (expressed in EIRP in dBW per carrier)	56 dBm	

[2] The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase Modulation.
The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation.

In order to minimise interference within its own network and with other radio networks, Hutchison 3G (UK) Limited operates its network in such a way that radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of Hutchison 3G (UK) Limited's network, the radio base station that is the subject of this application will be configured to operate in this way.	
Height of antenna (m above ground level)	Top of antenna 15m

5. Technical Justification

The proposed development is required to allow increased connectivity and reliability of mobile networks for H3G, within the local area.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV and downloads. The base stations are connected to each other (by cables or wireless technology) to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. There are several variables that determine the size and shape of each cell.

As base stations are low-powered radio transmitters they each have a limited range, meaning that they generally need to be located close to (or within) the target area which requires coverage. If a base station is moved too far away from the target area, then it is likely that some sections of the target area will remain without the network services which the Operator aims to provide.

High-quality communications infrastructure is essential for sustainable economic growth and that high-speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.

The UK Government recognises the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

The Planning Inspectorate too has in recent years continually recognised the importance of this issue and cited it in appeal decisions that have overturned the decisions of local authorities across the UK where there has been a failure to apply due weight to the value of connectivity to social and economic prosperity in the assessment of applications made for telecommunications development, even in protected or sensitive areas.

As an example, in October 2018 the decision of Winchester City Council to refuse prior approval for the installation of a 17.5m high monopole and associated equipment housing, required to replace an established site being lost from Vodafone's network, was overturned by the Planning Inspectorate (CTIL and Vodafone Vs Winchester City Council, appeal reference APP/L1765/W/18/3197522). Within the decision notice, the Inspector stated that:

> "*I attach significant weight to the public benefit arising from the continuation of local service provision…..Having regard to all relevant considerations..* ***my findings are that the proposal's public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area***" (emphasis added).

In October 2020, the decision of Elmbridge Borough Council to refuse planning permission for the installation of a 15-metre-high monopole incorporating shrouded antenna and supporting 2no external dishes was overturned by the Planning Inspectorate (EE Ltd and H3G UK Ltd Vs Elmbridge Borough Council, appeal reference APP/K3605/W/19/3243927). Within the decision notice, the Inspector stated that:

> *"The mast would be taller and thicker than the existing nearby street lighting columns, road signs and overhead cable poles. Due to its height, the mast would be visible in local views from the public domain and from some residential properties in proximity….However,* ***such masts are becoming more commonplace within the urban environment and so it would not appear as an alien or unexpected feature****"* (our emphasis).

In June 2021, the decision of Sheffield City Council to refuse their Prior Approval for the installation of a 20-metre-high monopole and associated cabinets was overturned by the Planning Inspectorate (MBNL Limited Vs Sheffield City Council, appeal reference APP/J4423/W/21/3268791). Within the decision notice, the Inspector stated that:

> "*Paragraph 80 of the Framework advises that* ***significant weight should be attached to the economic benefits of providing and enhancing electronic communications infrastructure.*** *Paragraph 112 advises that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being, and that the expansion of electronic communications networks, including next generation mobile technology, such as 5G, should be supported.*
>
> *The proposal would reinstate 2G, 3G and 4G coverage within the area as well as providing 5G coverage, services would collectively increase network capacity and provide ultra-fast and more reliable mobile connectivity, capable of handling ever-increasing data requirements. The development would provide extensive social and economic benefits to individuals, businesses, and public services, including education and healthcare. The Council does not question the social and economic benefits that would result from the proposal but concludes that they do not outweigh the harm found. However, as no suitable alternative sites have been identified, I attach substantial weight to the benefits that would result from the proposal.*
>
> ***In weighing all the above matters, although I have found that the siting and appearance of the proposal would significantly harm the character and appearance of the area, I consider the substantial social and economic benefits of the proposal outweigh the harm identified****"* (emphasis added).

It is considered that when the balancing method advocated in the NPPF is applied to the proposal, where the need and significant public benefit of ensuring the best available network coverage is provided, especially given the current times in which we find ourselves ensconced a hybrid-level of remote working, is balanced against the appearance and level of associated

visual impact of the proposed site, that the application proposal is positively in favour and is considered wholly appropriate.

In November 2021, the decision of the London Borough of Hillingdon Council to refuse their Prior Approval for the installation of a 20-metre-high monopole and associated cabinets was overturned by the Planning Inspectorate (MBNL Limited Vs London Borough of Hillingdon Council, appeal reference APP/R5510/W/21/3269903). Within the decision notice, the Inspector stated that:

> "*Based on the evidence before me,* ***the height of the monopole would be substantially taller than the mature trees which bound the site. Accordingly, it would represent a significant departure from the established height of existing lampposts with the height of the proposed structure representing a visually dominant addition to the existing environment****. Due to the substantial height of the monopole, and plethora of associated cabinets, the proposal would detract from the pleasing greenery within which it would be located.* ***This would harm the established landscape feature which positively contributes to the surrounding area as well as causing some harm to the visual amenities of surrounding properties, particularly those within converted office premises****. (emphasis added)****.***
>
> ***"The proposal would also be located relatively close to three Grade II Listed Buildings****. However, because the proposal does not seek planning permission or permission in principle, the duty established within Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, does not apply to this proposal.* ***Despite this, the Framework still requires the heritage implications to be fully considered"****. (emphasis added).*
>
> *"Accordingly,* ***although the siting and appearance of the proposed development would cause some limited harm to the setting of the nearby listed buildings, I am satisfied that the economic and social benefits of the proposal, would outweigh this harm***" (emphasis added).

Whilst the above appeals relate to the deployment of new ground-based installations, there are also now a number of appeals which have allowed the upgrading of existing installations up to a height of 20m. As such, it is clear that 20m is now the recognised, and accepted, height of telecommunications apparatus within the streetscene – regardless of setting – be it residential, suburban, commercial, or industrial. Given that the proposal before the Council is for a 15m installation, it is submitted that the same conclusions can be drawn from all four appeal schemes outlined above – in that the high quality provision of telecommunications services, and the public benefits that they provide, is essential to the economic and social prosperity of the local area, and, when compared to the visual impact that each scheme would cause, the development was found in favour. The same assessment can be applied in this instance.

Given that appeals APP/L1765/W/18/3197522, APP/K3605/W/19/3243927, APP/J4423/W/21/3268791, and APP/R5510/W/21/3269903 proposed brand-new monopoles measuring 17.5m, 15m, 20m and 20m, respectively, all were considered to be acceptable, even if they resulted in clear harm to their surroundings. Additionally, appeals APP/E2205/W/20/3261389 and APP/G4240/W/18/3201704, which were discussed in Section Three of this statement, proposed 20 metre-high monopoles and were both also considered acceptable by the Planning Inspector.

The importance of continued, and improved, telecommunications network coverage cannot be underestimated, especially throughout the years 2020 and 2021, when the dependence on these networks has been higher than ever before. This dependence has continued into 2022 as our online shopping, gaming, and social habits have changed, post-pandemic, as well as many people adopting a working-from-home or hybrid work pattern. There are now a plethora of appeal cases which have been considered appropriate by the Planning Inspectorate for installations very similar to the one proposed here, even within close proximity to residential housing.

Very recently, in March 2022, the decision of Broadland District Council to refuse their Prior Approval for the installation of a 17.5-metre-high monopole and associated cabinets was overturned by the Planning Inspectorate (MBNL Limited Vs Broadland District Council, appeal reference APP/K2610/W/21/3280694). Within the decision notice, the Inspector made specific reference to the '*Living conditions of the occupiers of neighbouring properties*', stating that:

> *"**At the location where the mast is proposed to be located there are houses which face onto, but are not accessed from, Dussindale Drive. These houses are set behind hedges and fences and separated from the proposed site of the mast by a cycleway and footpath. They also have front gardens and drives between the front elevation of the house and the cycleway and footpath**. The proposed equipment cabinets would not be visible from these houses. However, **the mast would be visible from the windows of their front elevations"*** (emphasis added).
>
> "*Policy GC4 of the DPD seeks, amongst other things, to consider 'the impact upon the amenity of existing properties' of new development. **Whilst the proposed mast is significantly taller than other street fixtures in the area it has a slim profile and will be finished in a light grey colour**. It is also set off the boundary with existing residential properties with a cycleway and footpath in between the proposed site and the boundary of the houses. In these respects, it is therefore consistent with Policy CG4 of the DPD"* (emphasis added).
>
> "*Moreover, **the residential properties have front gardens and drives between their front elevations and their boundaries. Consequently, given the slim profile of the mast, its light grey colour, and its distance from the front elevations of nearby properties I do not consider that its siting and appearance would unacceptably harm the outlook of the occupiers of these properties**"* (emphasis added).

Given that the Planning Inspectorate have, as recently as March 2022, determined that taller installations than the one proposed as part of this application (i.e. a 17.5m-high monopole as outlined in the appeal above), are considered acceptable within close proximity to residential properties, then it should be expected that a smaller installation in a similar setting should be considered equally as acceptable. It is therefore clear that Council support should also be offered to this scheme.

Furthermore, whilst the applicants do submit that the best town planning solution has been brought forward as part of this application, clear precedence has been set by the Planning Inspectorate which suggests that this should not be a determining factor, and that the best town planning option does not need to be brought forward.

In October 2020, MBNL (EE Ltd and H3G UK Ltd) vs Elmbridge Borough Council, appeal reference APP/K3605/W/19/3243927, which has already been discussed within this statement, the Planning Inspector included the following in the Appeal Decision Notice:

> *"Interested parties indicate that there are alternative sites available for the proposed mast. However, given my conclusion on the main issue it is unnecessary to address the merits of alternative sites.* ***There is no requirement in the Framework or the GPDO 2015 to select the best feasible siting****"* (our emphasis).

In April 2021, Cornerstone, Telefónica UK Ltd and Vodafone Ltd vs the Council of the London Borough of Havering, appeal reference APP/B5480/W/20/3251086, the Planning Inspector included the following in the Appeal Decision Notice:

> *"I note the Council's reservations regarding the appellants' list of alternative sites, and to that extent I accept that the appeal site has not been shown conclusively to be the least environmentally damaging option possible.* ***But the National Planning Policy Framework (NPPF) does not support that approach. Given that I have found no significant harm, it is unnecessary to consider other alternatives in any more detail****"* (emphasis added).

In May 2018, CTIL vs Sheffield City Council, appeal reference APP/J4423/W/17/3188962, the Planning Inspector included the following in the Appeal Decision Notice:

> *"With regards alternative sites, I have noted the appellant's submissions within the supplementary information as well as the contention of interested parties regarding the need for fuller consideration of siting. Nevertheless, I am mindful that even if alternative sites were available,* ***there is no requirement within the Framework or the GPDO for developers to select the best feasible siting where a site as proposed is considered to be acceptable****"* (emphasis added).

For the avoidance of doubt, the applicants do submit that the best environmental and town planning solution has been brought forward as part of this application, and an alternative site assessment has been included within this statement. It should, however, be noted that this is not required as part of the application, but rather forms part of the justification for site selection and outlines again, that no alternative, better, option could be identified within the local area that would satisfy the necessary technical criteria associated with a new base station.

At the time of writing, our dependence on network services and connectivity is ever more apparent. Restrictions on travel resulting from the Coronavirus pandemic, plus three national lockdowns, have resulted in a massive shift from office based to home working, from physical, professional and social gatherings to virtual ones, and to unprecedented reliance on online shopping and entertainment services. Network usage within suburbs has increased dramatically as less people are travelling to town and city centres than during pre-pandemic times. Maintaining and enhancing the mobile networks is of vital national importance, and it was significant that telecoms was designated as "critical work" during that time. It is anticipated that the current shift towards homeworking and online services will persist, to a lesser degree, in the future. It is vital that the infrastructure is in place throughout the UK to meet this demand, and the needs of the public.

The benefit of having a strong and resilient network has been highlighted in the last 30 months following the sudden shift in the network requirements, as the demand on the network in residential areas increased with home-working and home-schooling. Research by Ofcom,

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

The DCM and the RT Hon Oliver Dowden CBE MP highlighted the need for telecommunications companies to support the NHS by providing the connectivity it needed during the Covid-19 pandemic, stating the following in April 2020:

> *"Telecoms companies and their workers are making a major contribution to* ***keeping the nation connected during the COVID-19 emergency****, ensuring that people can stay and work from home"* (our emphasis).

In the current climate, with a dramatic shift towards home-working, online shopping and virtual social gatherings, the importance of connectivity for economic, social and physical wellbeing is more apparent than ever before. Infrastructure needs to be in place in order for people to benefit from these services, and it needs to be located in or very close to the areas where the users are located.

The Ofcom Connected Nations 2020 UK Report outlined a sharp increase in both mobile and voice data, particularly during the enforced national lockdowns of 2020. The report states that average call volumes and average call duration increased in the week that national lockdown was introduced in March 2020, with mobile hotspots shifting away from city centres to the suburbs and residential areas as restrictions continued.

Significantly, the same report states that the consumption of mobile data saw a staggering rise of 42%, when compared with the previous year. Additionally, the traffic carried in England in June 2020 (during lockdown) exceeded that carried across the whole of the UK (England, Scotland, Wales, and Northern Ireland) in February 2020 (prior to lockdown).

Research by Online Nation 2020 found in April 2020, internet users in the UK spent an average of 4 hours 2 minutes online each day, 37 minutes more each day per online adult compared with January 2020. This emphasises the importance of telecommunications infrastructure in being able to provide internet users with reliable network coverage and capacity to deal with an increasing amount of time online each day.

In his speech at Connected Britain 2020, in September 2020, Digital Infrastructure Minister, Matt Warman, stated the following:

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

The implementation of a third national lockdown throughout January, February, March and April 2021 saw a return of most aspects of life associated with the two previous lockdowns, and the same increases in voice calls and mobile data consumption is expected. Mr Warman also stated the following:

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

Central Governments' direction of travel is to support the roll-out of 5G technology and this was the case pre-pandemic. This has been emphasised by the Government's relaxation of Permitted Development rights, allowing Operators to more effectively and efficiently meet the needs of the general public and ever-increasing demand for mobile data consumption. Since its initial roll-out in 2019, Operators have continued to deploy 5G across the UK, largely via the upgrading of existing base stations. Around 3,000 base stations now carry 5G technology. Mr Warman also confirmed that legislative reforms were being undertaken to make it easier for Operators to deploy and upgrade telecommunications base stations.

In May 2021, Mr Warman also wrote to Local Authority Chief Executives in England, making it clear to Local Authority's that they have a role to play in supporting improved connectivity, and also stating the following:

> "*Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data is increasing rapidly, and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality mobile connectivity.*
>
> ***The Government is committed to extending mobile network coverage across the UK and providing uninterrupted mobile signal on all major roads, and our ambition is for the majority of the population to have access to a 5G signal by 2027****. Last year we agreed a £1 billion Shared Rural Network deal with the UK's mobile network operators to extend 4G mobile geographical coverage to 95% of the UK by 2025"* (emphasis added).

Notwithstanding the Covid-19 pandemic, and the increase in network reliance, a look at past data shows that our reliance on mobile networks was increasing year-on-year, prior to 2020. Ofcom's Communications Market Report 2018 provides a figure of 92 million active mobile subscribers in the UK at the end of 2017. It detailed that 78% of adults used a smartphone and that 76% of mobile users were using their devices for web and data access. Figures within the report also confirm that users were spending an increasing amount of time per day using their mobile phone. 68% of participants in the Touchpoints research reported that they "could not live without" their mobile phone (rising to 78% among 25-34s). Whilst not included within the research figures, anecdotal evidence suggests that this number is greater still amongst those aged under 18. Given that two years have now passed since this report, it is anticipated that these figures have increased further. All of which points towards the nation's increasing dependency on mobile services and connectivity.

A relatively recent YouGov survey (January 2021) adds further support to this, with 67% of those who were at the time working from home during the pandemic confirming that they had been using mobile data, as opposed the fixed-line broadband, agreeing that access to it would be an important factor when choosing where to live in the future. This rises to 76% for 18 to 34-year olds. The survey also confirmed that 44% of one network Operator's data traffic in January 2021 went to streaming services, such as Disney+, and that 45% of 18 to 24 year olds confirming that they are more likely to use their mobile data for browsing social media.

All of the above occur in a domestic setting. There is a clear need and demand for connectivity and capacity, and it is anticipated that telecommunications infrastructure has become, and will continue to become, commonplace in residential and suburban settings, and on highways verges, such as the application site.

As recognised by the London Assembly's Regeneration Committee within its "*Digital Connectivity in London*" report, published June 2017, digital connectivity is now widely regarded as the "'*fourth utility'*, *an everyday necessity alongside water, gas and electricity*" and also noted that "*mobile broadband is, and will continue to be, an essential complement of fixed broadband*". It is no longer a luxury, but a service essential to modern life.

The installation of this proposal will enable 3G and 4G services. The installation will also be 5G-ready at the point of the deployment, greatly improving the level, and quality, of network coverage to the surrounding area.

2G was the second generation of mobile phone transmission, it introduced data services for mobile, starting with SMS text messages.

3G was an extension to this and enabled the use of data. The main technological difference that distinguishes it from 2G technology is the use of packet-switching rather than circuit-switching for data transmission. Increased data rate to a minimum of 2 Mbit/s for stationary or walking users, and 384 Kbit/s in a moving vehicle.

Similarly, 4G was another extension and enabled an increased speed in connection. It supports a minimum data rate of 1 Gbit/s for stationary and 100 Mbit/s for mobile operation. In simple terms, the benefit to users is that 4G supports mixed data, voice, video and messaging traffic at significantly faster speeds than 3G. This results in ultra-fast internet browsing, video streaming, gaming, e-mail and downloads.

At a local level, this installation continues to allow for an increase in home working, by providing the opportunity to create a "virtual office", reducing the need to travel for work as a consequence.

It is therefore very important for 'mobile only' households that live and work and any businesses that operate in this part of the LPA's area, together with visitors and others who are staying in or travelling through the area, that the necessary indoor RF coverage is provided to enable them to have satisfactory mobile telephone and internet access.

On a wider scale, the proposal would continue to contribute towards the country's connectivity and digital economy future via the provision of brand-new 5G network coverage for Three UK. Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion, and, on a local scale, it is important to ensure the continuation of established telecommunications networks in this area.

Ofcom's 2018 Communications Market Research Report shows that smartphones are owned by four of every five UK consumers and smart TVs are in almost half of all households. Demand for data continues to grow rapidly for UK consumers, with 1.9GB consumed by an average mobile subscription per month in 2017, (up from 1.3 GB the previous year). The report found that more than seven in ten now use their mobile to access the internet, sufficient coverage is obviously vital for this basic utilities service to be provided.

The UK Government, recognising the benefits to commerce, industry and the public in general, places great emphasis on the benefits of mobile telecommunications to modern life. This position

was reinforced by a statement made by then Prime Minister David Cameron in March 2016 when he specifically addressed the vital importance of mobile connectivity for residents and local economies and highlighted that the urgent delivery of the required network improvements is a Government priority;

> *"Ten years ago, we were all rather guilty of leading campaigns against masts and all the rest of it. Our constituents now want internet and mobile phone coverage. We need to make sure that we change the law in all the ways necessary, that the wayleaves are granted, that the masts are built, that we increase coverage and that everyone is connected to the information superhighway. This is substantiated in the most recent budget announcement of 16th March 2016, which commits to provisions for "greater freedoms and flexibilities for the deployment of mobile infrastructure".*

Since 2016, and particularly during the enforced lockdowns of 2020 and 2021, public and business reliance on the established mobile networks has continued to increase. Improved mobile coverage and connectivity is now no longer viewed as a 'luxury', but rather an every-day necessity. This has been further exacerbated as, at the time of writing, the country appears to be adopting a more hybrid-working pattern, split between traditional office working, and working from home. As this 'working from home' naturally occurs within a residential setting, then it follows that the necessary infrastructure and apparatus must be in place to allow this to happen. As such, this type of infrastructure must be deployed within sub-urban, urban and residential areas. It is imperative that improving network connectivity and capacity is continuous – to meet the demands of the public who have changed both their working and social behaviour over the last 2 and a half years.

Alternative sites considered and not chosen.

Site[3]	Site Name and address	National Grid Reference	Reason for not choosing[4]
1	**Bushy Tails, Rayleigh Avenue, National Physical Laboratory, Hampton Hill, London Borough of Richmond upon Thames, London, Greater London, England, TW11 0LW, United Kingdom**	E: 515522 N: 170633	Discounted as the site is in private ownership.
2	**Teddington Rugby Football Club, Dora Jordan Road, National Physical Laboratory, Hampton Hill, London Borough of Richmond upon Thames, London, Greater London, England, TW11 0LY, United Kingdom**	E: 515436 N: 170594	Discounted as the site is in private ownership.
3	**125 Queen's Road, Hampton Hill, London Borough of Richmond upon Thames, London, Greater London, England, TW11 0LZ, United Kingdom**	E: 515759 N: 170549	This was discounted as access to nearby residential dwellings would be blocked by the site. It was considered that this option did not provide a better town planning and environmental solution, when compared directly to the application site.
4	**Tower House, Park Road, Hampton Hill, London Borough of Richmond upon Thames, London, Greater London, England, TW11 0AU, United Kingdom**	E: 515866 N: 170465	Narrow pavement at this location would hinder pedestrian access should the necessary equipment be installed. This option was therefore discounted.

[3] ETS - Existing Telecomm site, ES - Existing Structure, RT - Roof Top, GF - Greenfield

[4] SP - Site Provider, RD - Redevelopment Not Possible, T - Technical Difficulties, P – Planning
O – Other

Additional relevant information
Given the nature of the site search – i.e. a very specific area of Teddington – there is a very restricted geographical area in which this base station can be deployed, to ensure that the necessary coverage footprint is serviced. The surrounding area is mainly residential, and, as such, is restricted in terms of opportunities to deploy the required base station. As with any network planning, it is important to strategically position network cells sufficiently apart so that their coverage plots do not overlap (to any significant extent) and that the maximum coverage can be achieved from each separate base station. It is clear that the options within the local area are limited, with none of the alternative options considered to be preferable to the proposed development, in terms of either achievable network coverage or environmental impacts. It is considered that the application site offers an appropriate environmental and town planning solution, whilst simultaneously ensuring the operational parameters of the installation are met. It is considered that there is no better option within the search area, hence the application which sits before the Council. It is considered that the proposal is appropriate to the surroundings and that there is no better alternative location available which will provide the necessary coverage to the local area.
Additional relevant information (include planning policy and material considerations): <u>Environmental Information:</u> There is no evidence of protected species at this location, with the surrounding area consisting of largescale development and buildings. The proposal will subsequently not have any potential negative impacts on any sensitive habitats or species. As far as practicable the proposed development has been designed to keep to a minimum the impact on amenity and the design of the development ensures there would be only a limited impact which would not be sufficient to harm visual or residential amenity. <u>Siting and Appearance:</u> It is considered that the proposal utilises the most suitable design available to meet the technical requirement within the very specific technical constraints. As discussed in Section 3 of this document, this site is required to provide new network coverage to Teddington area. The proposed development before the Council has been specifically designed for use in urban areas and is the smallest and slimmest available to network Operator. It is considered that the use of a slimline monopole will reduce any perceived visual impact associated with the development (to the maximum extent) and restrict the visibility of the proposed structure within the local area. This will be assisted by the presence of mature hedge on this section of Bullard Road, plus the existing vertical features in the immediate vicinity – i.e. the street-lighting columns on Queens road This application will lead to significant connectivity improvements for the local area, with the provision of 3G and 4G network coverage for H3G (Three UK), as well as brand-new 5G capabilities. It is important to keep the impact of telecommunications development in the area to a minimum and it is considered that the proposed development achieves this. When considering the

benefits of the proposal, the public benefit from retained and improved connectivity and wireless communication services is a significant one. The applicant considers that any perceived visual impact on the area, or skyline, has been mitigated, as far as practicable, through the best design available within the technical constraints of the site, and that this development will provide excellent public benefits – both in the present, and in the future.

In this case, it is suggested that the application of the balancing method advocated in the NPPF, for the provision of communications and connectivity services, in the public interest, be utilised to balance the need for continued connectivity with the potential impact of the site. It is considered that when this balance test is applied to the proposal, where the need and significant public benefit is balanced against the appearance and level of associated visual impact of the proposed site, that the application proposal is positively in favour and is considered wholly appropriate.

This has been emphasised by the Planning Inspectorate on a number of appeal cases where, the Planning Inspectorate has ruled in favour of proposed developments of a similar nature, where this balance was applied. Some recent examples of where this balance was applied by the Planning Inspectorate include appeal cases referenced APP/Q3305/W/18/3206555 and APP/L1765/W/18/3197522. Extracts from these appeal decisions are included below for your convenience:

> "*In considering the need for the proposal, Government policy, as set out in the Framework states that advanced,* ***high-quality and reliable communications infrastructure is essential for economic growth and social well-being. In this respect, I have found that there is a need for the proposal which therefore weighs strongly in its favour.*** *As I have found that the level of harm relating to this second main issue would be low, that identified need would outweigh the harm in this case*" (emphasis added).
>
> "*I conclude on this issue that despite the less than substantial harm that would be caused, the* ***public benefits of the proposal would outweigh that harm****"* (emphasis added).
>
> "*9. The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "Advanced, high-quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections… The Council has commented that service provision would be 'adequate' without the proposal, but* ***the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision****"* (emphasis added).
>
> "*13. 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 telecommunication coverage and capacity would outweigh the limited harm*** *arising to the character and appearance of the area*" (emphasis added).

Whilst each application needs to be assessed on its own merits, the above appeals (along with a growing number of others, many of which are referenced in the preceding sections of this document) indicate a growing trend, based on national policy and guidance, to favour important utilities and infrastructure developments in the wider public interest when the potential harm is outweighed by the important and unavoidable public benefits they provide. Ensuring improvements in network connectivity, coverage and capacity within the Council's jurisdiction is considered a major public benefit.

The selected siting is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding harm to the local streetscene and the surrounding area. The application site has been strategically positioned within close proximity to the target area that the base station is designed to serve. Additionally, existing vertically engineered structures in the form of street lighting columns and traffic road signs, will filter public and road-user views of the proposed development. These features, therefore, will assist the apparatus into assimilating into the wider streetscene with ease.

The selection of a slimline monopole, rather than a lattice tower or a traditional shrouded monopole, has been brought forward to ensure that the size and scaling of the proposed installation is reduced as far as practicable. Whilst it is accepted that the monopole will be an addition to the streetscene, it is set in the context of a road junction with multiple streetlights and traffic crossings which makes the setting wholly accepting of additional utility infrastructure.

The antennas cannot be screened for operational reasons as this would result in an attenuation of the signal and reduced network coverage. However, strategically positioning the proposed installation a reasonable distance against mature hedge cover is considered that the least-impacting site has been brought forward as part of this application.

It is noted that the proposed site location is approximately 200m from the Bushy Park conservation area. Bushy Park conservation area consists of 44 hectares of well cared for historic parkland. It is listed as Grade I on English Heritage's Register of Historic Parks and Gardens, and contains an ancient monument (the Brew House c1710), the Longford River (recognised for its archaeological importance) and the Royal Paddocks. It is deemed that the proposed location does not pose any harm to this heritage site as it cannot be seen from Bushy Park. Therefore, the balance of the landscape-dominated setting and views of skylines and landmarks, are not spoilt by the proposal.

The proposed site location is also 200m from Park Road (Teddington) conservation area. The development of this area began in the 18th century with the building of large villas on the west side of Park Road, along this important route between the village of Teddington and Bushy Park. Similarly, it is felt that the proposed streetworks site will not be detrimental to the character of this heritage and conservation area as it cannot be seen from Park Road, or any of the adjoining streets included within the designation.

On balance, this proposed location is considered to be the optimum location in terms of siting and design, with the limited harm it may impose on the surrounding area being outweighed by the provision of continued and enhanced services to the area in the public interest. Given the social, economic and environmental benefits that will be brought forward as part of this proposal, in achieving continuous network coverage for the area, it is not considered that the perceived visual impact of this proposal would outweigh said benefits, and that Officer support should therefore be given. As such, equilibrium will be achieved between technical requirements and environmental impact.

Planning Policy Context:

National Planning Policy Framework (2019) (NPPF)

The National Planning Policy Framework came into force in July 2018 replacing the guidance published in March 2012 and was updated in February 2019. The NPPF sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states "*The purpose of the planning system is to contribute to the achievement of sustainable development*", and in paragraph 10 that "*at the heart of the Framework is a presumption in favour of sustainable development*". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

"*a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

For decision-taking (paragraph 11) this means:

"*c) approving development proposals that accord with an up-to-date development plan without delay; or*

d) 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:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Further to this, paragraph 38 states that "*Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.*"

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

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

Leading on from this, paragraph 112 states that "*Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.* ***Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)*** *and full fibre broadband connections*". Again, the proposal is entirely consistent with the aims expressed within the NPPF.

Given that there appears to be no timeline as to when things may return to 'normal', in regard to the hybrid-working situation which was caused as a consequence of the global coronavirus pandemic, ensuring that improved network coverage is available to all communities is of paramount importance to the Operators, as well as Central Government. The proposed development at the application site, will ensure 3G, 4G and 5G network coverage is provided to the local area.

It should be noted that paragraph 116 states that "*Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure*". A certificate of compliance with ICNIRP guidelines is included within this application.

It is stated in Section 4 of this statement that the Planning Inspectorate has in recent years continually recognised the importance of connectivity. When applying the balancing exercise encouraged at paragraph 196 of the NPPF, the Inspectorate has found in multiple cases that the provision, or prevention of loss, to existing services can outweigh less than substantial harm to heritage assets.

In determining one such appeal, brought by operator Telefónica (O2) against the decision of the London Borough of Harrow to refuse Prior Approval for the installation of a 12.5 metre high monopole with shrouded antenna section and accompanied by an equipment cabinet on a roadside verge in the urban area of Harrow-on-the-Hill (appeal reference APP/M5450/W/17/3180345, determined in December 2017), the Inspector concluded that:

> "*The proposal would be permitted development and provide public benefits in extending the telecommunications capacity of the area. In applying the balancing test of paragraph 134 of the Framework, I consider that these* ***benefits outweigh the harm that would arise from the proposal's impact on the character and appearance of the Conservation Area***" (emphasis added).

These findings were echoed by the Inspectorate in determining a further case brought by the same Appellants against the decision of the London Borough of Hillingdon to refuse planning permission for a 15 metre high monopole with shrouded antenna section and associated equipment housing at a roadside location within the urban area of West Drayton (APP/R5510/W/16/3143922, 2016).

The Inspector concluded:

> "The Framework sets out the importance of an advanced high-quality communications infrastructure for sustainable growth and makes specific reference to the development of high-speed broadband technology. **This is reflected in the London Plan and the public benefit arising from the improvement of the telecommunications infrastructure is a material planning consideration that weighs in favour of the proposal**.
>
> Taking account of all matters I have concluded that the **limited harm caused to the significance of the heritage asset (the CA) would be outweighed by the public benefit that would arise from improving the communications infrastructure**" (emphasis added).

In both cases cited, the developments were new base station installations proposed within Conservation Areas and it was determined that they would give rise to a degree of harm to the heritage asset in question. Despite this, the importance of providing a quality communications infrastructure was recognised by the Inspectorate and awarded due weight in the determination of the cases brought. That weight was sufficient for both appeals to be successful, despite the recognised harm. In the case of this application, the same public benefit occurs, plus the deployment of apparatus with 5G capability, without the harm to any nearby designated areas.

Local Guidance:

Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted development plan for London Borough of Richmond upon Thames Council, relevant to the proposal, comprises:

- London Plan (2021)
- The London Borough of Richmond upon Thames Local Plan (Adopted July 2018).

London Plan (2021)

A new London Plan was adopted in March 2021. In a similar fashion to the previous London Plan (2016), the new London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In 'Policy SI 6: Digital Connectivity Infrastructure' the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to ensure its global competitiveness, now and in the future.

It is considered that the Operators' networks are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. The written justification for Policy SI 6 states the following:

> *"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****.*

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.

Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their Development Plans".

Policy SI 6, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing H3G to provide continued and significantly enhanced coverage to the surrounding area. The proposed development meets the aims of the London Plan (2021) and the long-term strategies which the Mayor aims to achieve through this guidance.

<u>The London Borough of Richmond upon Thames Local Plan: (Adopted July 2018):</u>

<u>Telecommunications:</u>
Policy LP 33 relating to Telecommunications states that the "Council will promote the enhanced connectivity of the borough through supporting infrastructure for high speed broadband and telecommunications". Applications to the London Borough of Richmond upon Thames Council will be considered in accordance with the NPPF and the following:

1. Submitted evidence to demonstrate that all options for sharing of existing equipment, including with other operators, and erecting masts on existing tall buildings or structures, have been fully explored before considering the erection of new structures or facilities.
2. Visual impacts of telecommunications proposals should be minimised, in line with policies on Local Character and Design, particularly on rooftops.
3. Demonstration that the development will operate within the International Commission on Non-Ionising Radiation Protection Guidelines for public exposure.

The location of the apparatus has been chosen as a result of a specific search area, providing increased coverage to Teddington. It is not within the scope of this project to deploy equipment on existing tall buildings or structures as the equipment is to cover an area of weaker network connectivity. It has been demonstrated that the proposed scheme utilises good design. Whilst the apparatus may not be considered attractive, it is of '*high quality'* design. As detailed at length within this application, the apparatus is dictated solely by function. The apparatus is required to provide network coverage to a specific target area. It has no other function and, as such, this must be acknowledged by the Council. An ICNIRP Certificate has been submitted as part of this application.

Furthermore, clause 8.6.3 provides that applications for telecommunications development should have the necessary evidence to justify the proposed development, including:

1. The outcome of consultation with organisations with an interest in the proposed development (e.g. schools)
2. For new sites, a statement that self-certifies that the cumulative exposure of the development will not exceed International Commission on Non-Ionising Radiation Protection guidelines.

3. For new sites, evidence that the applicant has examined erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

As aforementioned, pre-consultation engagement letters were issued to Leyf Bushy Tails Nursery and Pre-School as an education centre within 400m of the proposed site location.

Achieving Design Quality:
The Local Plan policy seeks to ensure that all development is of a high design quality. This is consistent with the Richmond upon Thames Core Strategy and the London Plan's aim of delivering sustainable places as a key aspect of sustainable development.

Policy LP1 in the Local Plan (2018) states that "high quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise".

As highlighted within this document, the proposed development is considered to be in alignment with this policy. The design of the scheme is wholly dictated by function. However, the design of the monopole must be acknowledged, with 'stacked' antennas forming the upper part of the apparatus, rather than being attached within a wider headframe. Consequently, the monopole remains as slimline and linear as practicable, thereby reducing its prominence, and any visual impact, to the maximum extent.

Given the public reliance on these established networks, which has increased to unprecedented levels in the last 30 months, the need to deploy a new base station is clear, and certainly within the public interest.

The application site does not sit within a designated area and is not viewed within the setting of any listed buildings. As such, it is submitted that the proposed scheme will have no impact on any local heritage asset, which must be acknowledged by the Local Authority.

The application site is considered the most appropriate available, within a very specific search area. The proposed development has been specifically located to ensure that this coverage footprint is serviced. This design of the monopole is considered wholly appropriate for urban areas with slimline monopoles now regularly rolled-out across the country, in all locations – be it urban, non-urban, industrial, or commercial. As outlined elsewhere in this document, the Planning Inspectorate has recently allowed a number of similar developments within various Local Authority areas where the economic, social and environmental public benefits of each schemes were not given sufficient weight when the assessment was made.

As the 5G network roll-out is in its infancy, and as more sites are deployed, 20-metre high installations will soon replace existing 15 metre sites across the country – thereby becoming 'the new normal'. This is supported by the Government's relaxation of Permitted Development rights which have again been relaxed in early 2022 (after being previously relaxed in 2017), which shows a clear indication that 20m is now the accepted height for new base stations situated on highways land, immediately adjacent to the public highway, or outwith any planning designation.

The relaxation of these Permitted Development rights has been specifically undertaken to allow the smooth roll-out of 5G network services.

As outlined in the Alternative Site Assessment, in Section 5 of this document, the application site is considered to be the best solution from both a technical perspective, as well as a town planning and environmental perspective.

The ground-based equipment cabinets associated with this scheme are outright Permitted Development and are essential to the operation of the monopole.

No conflict has been identified with any other Development Plan policies.

Should this application not be supported, the need to deploy a base station within the local area will still remain. In that event, the applicants will therefore be directed towards locations which have already been assessed and considered to be less appropriate than the application site at Bullard Road.

Conclusion

In summary, the application is in respect of electronic communications apparatus necessary to improve local connectivity and public infrastructure networks within this area of Teddington.

This statement has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact, being appropriately designed and located, as far as practicable.

The proposed apparatus will provide the 'standard' 3G and 4G network coverage for Three UK within the local area, as well as providing brand-new 5G connectivity at the point of deployment.

In conclusion, the application merits support and there are no material considerations that indicate otherwise.

Contact Details			
Name (Agent)	Kate Gillespie	Telephone	NA
Operators	Hutchison 3G (UK) Limited	Fax No	NA
Address	12 Priory Court Poulton Cirencester GL7 5JB	Email address	NA
Signed	Kate Gillespie	Date	26th July 2022

Position	Surveyor	Company	Dalcour Maclaren
For and on behalf of Hutchison 3G (UK) Ltd			