

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Field End Road	Site Address:	Field End Road
National Grid Reference:	E: 512059 N: 186327		South Harrow
			Harrow
			London
			HA4 0RG
Site Ref:	HGN009/50688	Site Type: ¹	Macro

2. Pre-Application Check List - Site Selection (for New Sites only)

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 explain why:		
No suitable alternatives were identified. Re-use of an existing telecommunications site is the preferred option.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		
No suitable alternatives were identified. Re-use of an existing telecommunications site is the preferred option.		

Annual Area Wide Information to local planning authority

Date of information submission to local planning authority	Information not available
Name of Contact:	
Summary of any issues raised:	

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	30/04/2019
Was there pre-application contact:	
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised:	
Planning department emailed with request for pre-application consultation with proposed plans but no response received to date.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Amber
The site was rated as amber due to its proximity to residential dwellings. Pre-application consultation letters were sent to the following people on 30th April 2019; Councillor Allan Kauffman Councillor Vanessa Hurhangee Councillor Steve Tuckwell Boris Johnson MP	

School/College

Location of site in relation to school/college (<i>include name of school/college</i>):
Field End Junior School is located approx. 326m to the North of the site location.
Outline of consultation carried out with school/college (<i>include evidence of consultation</i>):
Consultation sent to Field End Junior School, Field End Rd, Ruislip HA4 9PQ via email to the address enquiries@fieldendjun.hillingdon.sch.uk
Summary of outcome/Main issues raised:
No response received to date

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

Will the structure be within 3km of an aerodrome or airfield?	Yes	
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	
Details of response: RAF Northolt, West End Road, Ruislip, London, Middlesex, HA4 6NG is located some 1.8Km from the site, preconsultation has been sent via email to TMCO@mod.uk and SPTMCO@mod.uk, however no response has been received to date.		

Developer's Notice

Copy of Developer's Notice enclosed?		No
Date served:	FULL PLANNING APPLICATION- Article 13 Notice served.	

3.0 Proposed Development

The proposed site:

The site in question is located adjacent to Field End Road, an area populated by rows of residential dwellings with a large amount of schools present in the surrounding area. Some 650m to the South of the installation is a Victoria Retail Park which backs onto Chiltern Main Line, a key transport route that connects London to Birmingham with Acton–Northolt line running adjacent. RAF Northolt, is located approx. 1.8Km to the West of the installation, RAF Northolt is a busy runway accommodating for both RAF flights and private civil flights.

Residential dwellings are located some 20m from the installation. To the West of the installation along Paddock Road, residential dwellings are situated at their closest, however the installation will be seen at oblique angles as the façade of the dwellings do not look directly upon the installation. Houses to the East of the installation do have direct line of sight to the installation, however this is beyond Field End Road, dwellings looking directly upon the installation are limited. Additionally, the dwellings which do have direct line of sight, already look upon the existing mast, as such, its id deemed the installation will not be an obtrusive feature within the landscape.

Existing vertical features running down Field End Road provide screening to the installation, high rise trees run for the entirety of the Field End Roads duration, these are accompanied by existing street lighting columns, BT poles and road signage. Mitigating views from dwellings and road users alike.

The site is not located within any specific planning designations, with the nearest building being The Roman Catholic Church of St Gregory the Great, a grade II listed building some 1.1Km to the West. Due to the distance from the Church to the installation, in addition to the topography of the landscape, it has been concluded that the Church of St Gregory will remain unaffected by the proposal.

Full consideration has been given to alternative sites and other existing masts in the vicinity. However, the proposed location and design are considered to provide the optimum solution in this instance, the site has to fit into an existing network and re-using the existing site will mitigate the need for an additional site within the area and maintain the current level of network coverage. Additionally, re-use of an existing site represents the preferred option, as outlined in the NPPF discussed in further detail below.

View of existing mast to the South of Field End Road.



View of the existing mast to the North of Field End Road.



Planning History

60595/APP/2016/2391

Replacement of existing 11.7m high telecommunications monopole with 15m high telecommunications monopole and installation of two stacked equipment cabinets and associated development.

GPDO – Approved – 03/08/2016

60595/APP/2005/1205

Installation of a 12-metre-high imitation telegraph pole mobile phone mast and equipment cabinets.

GPDO – Refused, 07/06/2005 – Granted at appeal, 07/02/2006.

Current Telecommunications Use/ The Future

Since the date of the above decisions, mobile operator networks have been under increased pressure to provide up-to-date telecommunications functionality, as mobile phones and mobile broadband use have become increasingly essential to our daily lives. 5G is the next generation of technology to enable increased connectivity with increased data speeds. The growth of digital connectivity over the last decade and the expectations of users have advanced at an unprecedented level. The NPPF recognises that “Advanced high quality and reliable telecommunications infrastructure is essential to economic growth...”, as will be considered in more detail below. The current proposal will provide positive benefits to the community which will far outweigh any perceived negative

impacts. MBNL have produced an advisory note entitled 5G and Future Technology- Delivering the UK's Telecoms Future and this is enclosed as part of the application.

Enclose map showing the cell centre and adjoining cells:

Information available on request.

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

Description: - A telecommunications base station located at Field End Road, South Harrow, Harrow, London, HA4 0RG.

The proposed development will include the removal and replacement of the existing 15m monopole, with a 20m monopole, 12 no. antennas, equipment cabinets, the removal of the existing 15m monopole, 3 no. antennas, redundant equipment cabinets and development ancillary thereto.

Overall Height: 20m

Height of existing building (*where applicable*):

N/A

Equipment Housing:

Length:

As per attached drawings

Width:

Height:

Materials (*as applicable*):

Tower/mast etc – type of material and external colour:

As per attached drawings

Equipment housing – type of material and external colour:

As per attached drawings

Reasons for choice of design:

The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements needed by the operator. It is necessary for the height of the structure to ensure that the topography of the landscape does not have an unacceptable impact upon mobile signal quality and that the structure is able to support the 5G antenna and other apparatus.

The mast has been specifically designed for the site in question, taking into account the existing street scene. Whilst the proposed replacement mast is taller than that which already exists, it needs to be in order to introduce the required technologies to the area. The existing masts and associated equipment has been in situ for a considerable length of time without causing any undue harm to its setting. As such, it is believed that the proposed installation will not be of an adverse impact upon the surrounding area.

Ground based equipment has been sited with the idea to keep visual impacts to a minimum. Immediately to the West of the installation, existing trees and hedgerows will act as a backdrop to the ground-based equipment. The entirety of the area is heavily populated with existing vertical features, this provides screening, context and a backdrop to the proposal. It is

contended that the site in question is capable of accommodating the proposed development without causing excessive street clutter.

Full views of the installation will be restricted for road users to short range, existing high-rise trees will mitigate views of the installation when approaching from the North and South of Field End Road, limiting views of fleeting glimpses. As a result of this, it is considered that the appearance of the installation would not form an obtrusive feature within the landscape.

Every effort has been made in relation to the equipment associated with the installation, to keep visual intrusion to a minimum. Consideration has been taken in order to reduce the cumulative impact that a telecommunications installation in this location may have upon the vicinity.

The replacement site has been relocated slightly more North than the current installation in place, this is done in order to assure that the network is still able to run during the 5G upgrade, if the installation were to be located in the same location as the existing, the network would experience down time, resulting in no network coverage whilst works are being carried out.

Full consideration has been given to alternative sites and other existing masts in the vicinity. However, the proposed location and design were considered to provide the optimum solution in this instance. Re-use of an existing site represents the preferred option, as outlined in the NPPF discussed in further detail below.

The height of the proposed apparatus is the minimum capable of providing the technological improvements sought and satisfying ICNIRP requirements. Whilst it is acknowledged that there is a significant increase in the scale of telecommunications development on the site, it should be noted that the new technologies will provide advanced high-quality communications infrastructure essential for economic growth as sought by the NPPF. Furthermore, existing equipment will be removed where not required to allow the proposed equipment to be located on or as close to the same location as possible.

4.0 Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) *	Yes	No
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. 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.		
Frequency	To be provided on request	
Modulation characteristics ²	To be provided on request	
Power output (expressed in EIRP in dBW per carrier) In order to minimise interference within its own network and with other radio networks, EE 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 EE's network, the radio base station that is the subject of this application will be configured to operate in this way.	To be provided on request	
Height of antenna (m above ground level)	20m	

5.0 Technical Justification

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

Information available upon request.

Background:

As part of EE Ltd.'s and H3G Ltd.'s continued network improvement program they wish to upgrade the existing site to facilitate additional coverage and capacity requirements, incorporating new technologies. Section 10 of the NPPF sets out the Government's general overview regarding supporting high quality communications infrastructure, recognising that advanced, high quality communications infrastructure is essential for sustainable economic growth. In order to keep the

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.

number of base stations to a minimum, the use of existing sites is considered to provide the optimum solution and accordingly the proposed site upgrade should be viewed positively. As such, no alternative locations were sought in this instance.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive; calls, texts, emails, pictures, web, TV and downloads. Without base stations, mobiles devices and phones will not work.

Many other everyday items also use radio signals to send and receive information, such as television and radio broadcasting equipment and two-way radio communications. Base stations are connected to each other and telephone exchange buildings by cables or wireless technology such as microwave dishes, to create the network. The area each base station covers is called a “cell”. Each cell overlaps with its neighbouring cells to create a continuous network. The size and shape of each cell is determined by the features of the surrounding area, such as buildings, trees and hills which can block signals. When people travel between cells, the signal is transferred between base stations without a break in service. Each base station covers a certain area only and can only handle a limited number of calls at once. As mobile phones and devices become more popular, more base stations are needed to ensure continuous coverage.

It is imperative that support is given to the introduction of new infrastructure to allow new technology which will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds. Whilst it is acknowledged that there is a significant increase in the scale of telecommunications development on the site, it should be noted that the new technologies will provide advanced high-quality communications infrastructure essential for economic growth as sought by the NPPF. Any perceived negative impacts will be far outweighed by the overall benefits of the scheme and the location of the apparatus on a building which already supports extensive telecommunications equipment will minimise its potential impact on the immediate environment.

All EE installations are designed to be fully compliant with the public exposure guidelines established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines have the support of UK Government, the European Union and they also have the formal backing of the World Health Organisation. A certificate of ICNIRP compliance will be included within the planning submission.

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

Site ³	Site Name and address	National Grid Reference	Reason for not choosing ⁴
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If no alternative site options have been investigated, please explain why

The site is an existing telecommunications site which is to be replaced and upgraded.

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

Planning Policy Assessment

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with policies of the adopted Statutory Development Plan, unless material considerations indicate otherwise.

National Planning Policy Framework (2018)

The National Planning Policy Framework (NPPF) was published in July 2018 and supersedes previous versions of the document and national planning guidance contained in the various Planning Policy Guidance notes and planning Policy Statements. The NPPF sets out the Government's economic, environmental and social planning policies and how these are to be applied in relation to all planning applications.

Under Section 6 paragraph 80 the NPPF advises....” *Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.* The proposal seeks the upgrade of an existing telecommunications site, rather than utilising land which has not previously been developed. This approach provides a sustainable solution to the need to upgrade telecommunications services in the area which will benefit not only the local community, but also visitors to the area and potentially reducing the need to travel.

In section 10 of the new NPPF, the document seeks to support “*Advanced, high quality and reliable communications infrastructure*” ensuring that it is “*essential to economic growth and social wellbeing*”. It advises that “*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.*” Paragraph 113 states” *the number of radio and electronic communications masts, and the sites for such installations, 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. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.*” The proposal allows for the re-use of an existing telecommunications site which will be upgraded to allow for the introduction of 5G technologies.

Paragraph 114 continues” *Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:*

a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and

b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.

The scheme will not cause any undue impact on the services outlined above and fully complies with ICNIRP standards. An ICNIRP certificate is enclosed with the application. The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for EE Ltd and H3G (UK) Ltd to enhance telecommunications services in the area to the benefit of the local community and visitors to the area. It will make effective use of the land as set out under Section 11 of the NPPF.

The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for EE Ltd and H3G (UK) Ltd.

Local Planning Policy

The statutory development plan for the area is comprised of London Borough of Hillingdon Strategic Infrastructure Plan (May 2017), Local Plan Strategic Policies (Adopted 2012) and Saved Unitary Development Policies.

The London Plan, March 2016

“POLICY 4.11 ENCOURAGING A CONNECTED ECONOMY

Strategic

A. The Mayor and the GLA Group will, and all other strategic agencies should:

a) facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive connectivity meeting the needs of small and larger enterprises and individuals.

b) Support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits.”

It is contended that the installation will comply with Policy 4.11, securing the Mayor’s vision for the delivery of modern communications networks across London.

The proposed installation will bring 5G to the area, supporting modern infrastructure and providing the best network connectivity possible across Hillingdon. The 5G network is to be the fastest service operators are able to provide, the new technology will enable easy and rapid access to information. The services provided by the mast will benefit both the local community and those working in the area.

Hillingdon Strategic Infrastructure Plan (May 2017)

“4.2.6 Telecoms and Broadband

Context Vodafone partner with O2, Three partner with EE under a company called MBNL and each partnership ensures sufficient mobile network coverage and capacity through the provision of the necessary infrastructure (antennas and masts on sites). BT Openreach provide the necessary infrastructure for broadband provider fixed roll-out.

The Housing White Paper Fixing Our Broken Housing Market (February 2017) set out that to achieve full fibre connectivity it is consulting on requiring local authorities to have planning policies setting out how high-quality digital infrastructure will be delivered in their area.

At the 2016 Autumn Statement, the Government announced over £1 billion of new funding to boost the UK’s digital infrastructure. This includes £400m of funding for a new Digital Infrastructure Investment Fund to support access to commercial finance for providers to invest in new fibre networks, and £740m to support the market to roll out full fibre networks and to deliver a programme of 5G and integrated fibre trials in local areas. In assessing bids for these trials from local authorities, the DCLG will take account of which areas can demonstrate that they have policies setting out how high-quality digital infrastructure will be delivered in their area. Furthermore, the Local Government Finance Bill published on 13 January 2017 will give a business rates tax break worth £60 million to incentivise telecommunications companies to lay new full fibre broadband.”

Securing a 5G development will improve the social and environmental conditions in the area and will provide significant benefits to the community in general. The current application forms part of a multi-million-pound trial of new high-speed connectivity, paving the way for the future rollout of 5G across the UK. The installation has been designed to the highest possible standard, utilising the latest equipment available. The use of a single site for two operators will in any event remove the need for additional base stations in the area.

It is assured that the presence of 5G within the area will provide significant benefits to both the local community and businesses alike. The proposal incorporates the latest technologies and design techniques to ensure that the proposed monopole will be as easily assimilated into the existing environment as it is able to be. It is determined that the benefits of granting planning permission would significantly outweigh any potential perceived negative impacts and accordingly it is contended that permission should be granted in line with the above statement.

Local Plan Strategic Policies (Adopted 2012)

“Policy HE1: Heritage

The Council will:

1. *Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes: Historic village cores, Metro-land suburbs, planned residential estates and 19th and 20th century industrial areas, including the Grand Union Canal and its features; Designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments; Registered Parks and Gardens and historic landscapes, both natural and designed; Locally recognised historic features, such as Areas of Special Local Character and Locally Listed Buildings; and Archaeologically significant areas, including Archaeological Priority Zones and Areas.*
2. *Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant.*
3. *Promote increased public awareness, understanding of and access to the borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities.*
4. *Encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset.”*

The installation is not located within any specific designations, the nearest being Islip Manor a Local Nature Reserve, some 1.6km to the South of the installation. Additionally, the nearest listed building is situated approx. 1.1Km to the West of the installation at The Roman Catholic Church of St Gregory the Great, a grade II listed building. The Roman Catholic Church is situated adjacent to a large retail park, backing onto the busy trainline, as such, it is considered that the Churches heritage will remain unaffected by the installation.

“Policy CI1: Community Infrastructure Provision

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.”

The proposed installation will bring 5G to the area, supporting modern infrastructure and providing the best network connectivity possible across Hillingdon. The 5G network is to be the fastest service operators are able to provide, the new technology will enable easy and rapid access to information. The installation is located within an area, populated by a vast amount of schools, the services provided by the mast will benefit both the local community, educational establishments and businesses within the immediate area. Whilst there will be some visual impact it is contended that the character and appearance of the area will not be unacceptably harmed and the overall benefits of the proposal will outweigh any perceived harm.

Saved Unitary Development Policies.

“Policy BE37

Telecommunications developments will be acceptable in principle provided that any apparatus is sited and designed so as to minimise its effect on the appearance of the surrounding areas. The local planning authority will only grant permission for large or prominent structures if:

- (i) *There is a need for the development in that location;*
- (ii) *No satisfactory alternative means of telecommunications is available;*
- (iii) *There is no reasonable possibility of sharing existing facilities;*
- (iv) *In the case of radio masts there is no reasonable possibility of erecting antennae on an existing building or other structure; and*
- (v) *The appearance of the townscape or landscape is not seriously harmed.”*

Network planners have identified the need to upgrade this existing telecommunications site and it is proposed to introduce up to date technologies to the area. It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices

simultaneously at much faster speeds than is possible using the existing technology. This will enable places to remain competitive in and will support the Government's ambition for the UK to become a world leader in 5G.

The proposed mast is the minimum height and girth capable of introducing the desired new technologies which will benefit the area more generally. It has been designed and sited to minimise its impact as far as possible and it is believed that the proposed installation will not have an undue impact upon the amenity of the area. Whilst there will be some visual impact it is not considered that the impact will be so great as to warrant the refusal of planning permission. Furthermore, no suitable alternatives exist and the re-use of an existing site is the preferred solution, as indicated in the NPPF. The mast has been specifically designed for the site in question, taking into account site specific characteristics as highlighted above.

The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for EE Ltd and H3G (UK) Ltd. In all these circumstances it is contended that the proposed development complies with the aims and objectives of Policy IN2 and accordingly planning permission should be granted.

"Policy BE13

Development will not be permitted if the layout and appearance fail to harmonise with the existing street scene or other features of the area which the local planning authority considers it desirable to retain or enhance."

The proposed mast has been specifically designed for the site in question taking into account the setting of the surrounding area. The design and scale of the installation are appropriate in this setting,

Whilst there will be an increase in the height of the installation, it is contended that the proposed mast, which will introduce 5G technologies to the area will support the local economy in this active setting. The most up to date equipment will be provided and the overall benefits of the proposal far outweigh any perceived negative impacts. Other vertical elements in the form of lampposts already exist in the street scene without causing any undue harm. It is considered that the proposed monopole will merely be seen as another vertical element in the street scene. The installation is set back from the road, to the rear of the pavement behind the grass verge and will not impede pedestrian passage.

The proposed increase in height is the minimum capable of providing the technological improvements sought. It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds than is possible using the existing technology. This will enable places to remain competitive in and will support the Government's ambition for the UK to become a world leader in 5G. The proposed replacement mast needs to be taller than the existing mast to introduce the required new technologies to the area and satisfy ICNIRP

requirements. In all these circumstances it is contended that the proposal is suitable to the form and function of the site and therefore complies with Policy BE13.

CONCLUSION

We consider that the development complies with both national and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system that will be of significant benefit to the community.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

The social and economic benefits of providing reliable and high quality mobile 5G connection support growth in productivity, efficiency and labour force. We believe that the strong benefits to the modernisation of this mobile network service will outweigh any minor loss of visual amenity to the surrounding area.

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This application explains the technical need for the installation to provide improved customer service.

In terms of siting and design, it is considered that the proposal responds well to the character and appearance of the local environment and will not have an unacceptable adverse impact on the application site or the surrounding area. The design is of a high standard, and will not detract significantly from the existing visual and environmental character of the area. The benefits to residents and visitors to the area far outweigh any potential perceived negative impacts. In all these circumstances it is concluded that there no policy or other objections that would warrant the refusal of planning permission and accordingly permission should be granted for the proposed development.

Contact Details

Name (agent)	Jenna Allen	Telephone	07812231010
	Beacon Communications Services Ltd.		

Operators	MBNL, EE(UK) Ltd & H3G (UK) Ltd	Fax no	N/a
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Address	Unit 26-28	Email address	Jenna.allen@beaconcomms.co.uk
	Britannia Way		
	Lichfield		
	WS14 9UY		
Signed	J.Allen	Date	15th May 2019
Position	Town Planner	Company	
			For and on behalf EE Ltd & H3G (UK) Ltd