
HGN009. Land adjacent to Field End
Road, South Harrow, London HA4 0RG

Planning Appeal –Proposed
telecommunications removal and
replacement

Statement of Case

The Council of the London Borough of
Hillingdon, Appn Ref:
60595/APP/2019/1653

TITLE
Statement of Case

DATE
4 December 2019

WRITTEN BY
M Caine

AUTHORISED BY
Clare Preece

REVISION
1.0

REFERENCE
FL11399

hello@fullerlong
0845 565 0281
fullerlong.com

Head Office: Floor 5, 10 York Road,
London
SE1 7ND

London

Surrey

Cambridgeshire

Kent

Yorkshire

Scotland

Fuller Long

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1.0 INTRODUCTION

- 1.1 This Statement of Case has been prepared in support of an appeal against the refusal of planning permission by The Council of the London Borough of Hillingdon (the Council) for planning application 60595/APP/2019/1653. The proposed development is for:

Proposed telecommunications removal and replacement

- 1.2 The planning application was refused by the Council under delegated powers for the following reasons:

1. *The proposed telecommunications mast installation by reason of its excessive height, scale, design and location would be an incongruous and visually obtrusive form of development, thereby resulting in a detrimental impact on the character and appearance of the street scene and surrounding area. Furthermore, the proposed cabinets, by reason of their size, siting and design would add undue clutter to the detriment of the visual amenity of the street scene. The proposal is therefore contrary to Policy BE1 of the Hillingdon Local Plan: Part 1 Strategic Policies (November 2012), Policies BE13 and BE37 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).*
2. *The proposed development, by virtue of its size, scale and proximity would be detrimental to the amenities of the adjoining occupiers at 590 Field End Road by reason of visual intrusion. Therefore the proposal would be contrary to policy BE21 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).*

Processing of Planning Application

- 1.3 Prior to the submission of the planning application the agents Beacon Comms on behalf of the applicants, MBNL (a joint venture between EE (UK) Ltd and H3G (UK) Ltd), formally contacted the planning authority setting out the proposed upgrade to the existing telecommunications equipment located at Field End Road. This letter is provided as Appendix 1. The applicants also contacted the three local ward Councillors and local Member of Parliament and a local junior school (see Appendix 7, p2). No responses were received to these pre-application consultations.
- 1.4 The subsequent planning application was dated 5 May 2019 and was validated on 16 May 2019.
- 1.5 It should be noted that the site address used by the Council in its decision notice is incorrect. This implies that the application site is located in a prominent position adjacent to the junction of Paddock Road and Field End Road. However, it is sited on a grass verge that runs parallel to Field End Road. The application site is therefore on land adjacent to Field End Road.
- 1.6 Information submitted with the application provides full details of the proposals as follows:
- Pre-con letter (App 1)
 - Cover letter (App 2)
 - Application form (App 3)
 - Plans and drawings (App 4)
 - Amended drawings (App 5)
 - Supplementary Information in support of the application (App 6)
 - Joint statement from the Dept. for Digital, Culture, Media and Sport and Ministry for Housing and Local Government “Collaborating for Digital Connectivity” (App 7)
 - Future Technology Statement (App 8)

- ICNIRP Public Exposure Guidelines Certificate as submitted with the original application (App 9). A revised ICNIRP certificate for the amended Rev D plans is included at Appendix 15.
 - Article 13 Site Notice (App 10)
- 1.7 The planning authority notified a total of 53 local neighbours and the South Ruislip Residents Association regarding the application. No objections, or other representations, were submitted in response to the application's notification procedure. No objections were also received from any consultees including the Council's Landscape Architect who assessed the impact of the proposal on the landscape character and appearance of the area. The Council's Landscape Architect's comments appear to suggest that they are satisfied that the existence of telecommunication equipment nearby and the existing backcloth of trees that the proposal would be seen against would provide sufficient mitigation to ensure that no unacceptable visual impact would occur.
- 1.8 The application was refused planning permission under delegated powers on 26 July 2019. Copies of the Officer's Report and Decision Notice are provided as Appendices 11 and 12.
- 1.9 Photographs of the application site are provided in App 6. Additional background information which sets out Government Guidance promoting/facilitating digital communications growth is provided with this appeal:
- Connected Growth – A Manual for Places; Dept. for Digital, Culture, Media & Sport (App 13)
 - Councils & Connectivity, Building Mobile Britain, Sept 2018, Mobile UK (App 14)
 - Updated ICNIRP Public Exposure Guidelines Certificate (App 15)
- 1.10 Appendix 16 provides photomontages of the proposed development together with existing images from the same locations.

Relationship to Existing Base Station

- 1.11 The proposed development is to replace and reuse the existing base station at the appeal site. As explained in App 6, the proposed mast is the minimum capable of accommodating the 5G equipment and meeting ICNIRP standards.
- 1.12 The application includes the removal of the existing monopole on the site and all but one of its associated existing cabinets. Due to network coverage requirements the proposed apparatus would be located approximately 18 metres to the north of the current location (see drawing 215 Max Configuration Site Plan for details). One small existing equipment cabinet (used for BT Fibre) is also proposed to be retained in its current location. The land comprising the existing base station will be restored to its previous condition before the development took place within three months of the removal of the equipment. The selected site is 18m to the North West of the existing site. This degree of separation was necessary to avoid obstruction of the public footpath approximately 5m North West of the site and to allow for the cabinet arrangement required on either side of the replacement mast.

2.0 RESPONSE TO REASONS FOR REFUSAL

Need for Proposed Development

- 2.1 The proposed development by MBNL, which is a joint venture between EE (UK) Limited and H3G (UK) Limited, is part of these companies' programme to upgrade the existing mobile/digital telecommunications equipment to accommodate 5G services. The proposal would provide an upgraded base station to achieve this.
- 2.2 Upgrading digital telecommunications is a key Government priority. This is set out in detail in the National Planning Policy Framework (the NPPF) (see below) and is also summarised in the joint DDCMS and MHLG statement (Appendix 7) and also in the DDCMS Connected Growth Manual (Appendix 13). This document notes that improved digital infrastructure lowers barriers to social and economic participation and boosts productivity and earning power (App 14 p6) and the Minister emphasises that the digital sector is central to the nation's economic future (see, for example, the Secretary of State's Foreword to the Manual, p3). Furthermore, the Government wants the UK to be a world leader in 5G with the majority of the UK population to have access to a 5G signal by 2027 (App 14 p37). Critical to achieving this is the ability of operators to deploy appropriate infrastructure. Additional background information on this is provided in Appendices 8, 13 and 14.

Alternatives Considered

- 2.3 Before considering the current proposals for the replacement of the existing base station on land adjacent to Field End Road, MBNL considered a number of alternative options. A sequential approach was adopted identifying an appropriate location with site sharing, followed by use of an existing site or building with a new site being considered last. The first was to consider accommodating the new equipment on the existing monopole at the base station. However, the existing monopole is not capable of accommodating the required equipment and its height would be insufficient to avoid interference or to meet ICNIRP requirements.
- 2.4 Other alternatives are to use existing tall buildings or other existing telecoms poles:
- *Tall Buildings.* There are no tall buildings within the area capable of addressing the network requirement of this location. To address this requirement buildings would need to be in excess of 15m in height and there are none in the locality.
 - *Existing Masts.* There are no existing masts by other operators that are capable of accommodating the required equipment for this proposal in the vicinity of the appeal site.
- 2.5 The current proposal is for the re-use of an existing base station for the upgrade. Use of this site as a digital communications base station is long-established having been used as such since 2006 (planning application ref 60595/APP/2005/3498 which was initially refused by Hillingdon Council but upheld at planning appeal on 31/08/2006). The re-use of an existing base station for the proposed upgrade is an approach that is consistent with the principles of sustainable development which is significantly more attractive, in planning terms, than the development of a new site for the proposed base station.
- 2.6 The re-use of the existing base station therefore ensures that the number of base stations in this area remains the same as existing while, at the same time, ensuring an important upgrade to 5G services for mobile communications. Furthermore, the proposed replacement base station will be shared by two network operators further mitigating visual impacts through avoiding unnecessary proliferation of base stations and telecommunications masts.
- 2.7 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 and discussed in further detail below.

Design

- 2.8 Another factor in the options considered for the development is the height of the proposed monopole. This is 20m, which is 5m higher than the existing pole. The reasons for the choice of design are set out in detail in p7 of App 7. The additional height is required to address the specific technology being installed, to avoid potential interference and to take into account the topography and structures in the local area, as well as ensuring that ICNIRP requirements are complied with. The proposal is the minimum height and girth capable of providing the improved services proposed and introducing 5G technology into the area (see App 8). The precise location ensures that existing equipment from the current site will be removed and re-used where possible.
- 2.9 The appeal site is on a landscape verge that runs parallel with the footway on Field End Road. It is set against the line of lofty established trees and a large amount of street furniture, including tall vertical structures such as street lighting columns, telegraph poles and another established telecommunications base station. Therefore, whilst the shrouded antenna would be visible it would be seen against the backdrop of tall mature trees from certain viewpoints and in the context of an area where numerous vertical features exist.
- 2.10 Although all elements of the proposal would therefore be observable at close quarters, when approached more obliquely from along both directions of Field End Road they would not appear as cumulatively prominent or cluttered in the street scene. Furthermore, the impact of the proposed column and cabinets would be reduced by the use of coloured powder coating which could be similar to that found on nearby street lights or the greenery of the landscape verge. This could be secured by an appropriately worded planning condition. The proposed monopole needs to be considered in the context of the existing character of the location, the lack of alternatives for the proposed upgrade and the enhancement of telecommunications (including the introduction of 5G) into this locality that will arise with the proposal.
- 2.11 The most up to date designs and equipment are to be provided on the site and the associated equipment cabinets are the minimum number capable of supporting the required technologies for two operators.
- 2.12 Appendix 16 provides a series of photomontages that demonstrate the limited visual impact of the proposed development. Finally, it is notable that there were no objections from any local residents.
- 2.13 The most up to date designs and equipment are to be provided on the site and the associated equipment cabinets are the minimum number capable of supporting the required technologies for two operators.

Impact on Character and Appearance of the Area

- 2.14 It is argued in the Delegated Application Report that the proposed monopole would appear as a utilitarian and incongruous feature in the streetscape and that the equipment cabinets would appear out of keeping against the green landscape and add undue clutter to the street. It is also stated that the space between the cabinets and the retaining walls would create potential for littering. (App 11). Nonetheless, it is considered that the application report substantially overstates the impact that the proposal will have on the character and appearance of the surrounding area for the reasons set out below.

Proposed Mast/Monopole

- 2.15 The proposed monopole would undoubtedly be taller than the existing pole, however it would still be of a slimline design and appearance that would be similar to that of the existing mast that forms a part of the context of the local area (see App 5, drawing 265 Max Configuration Elevation). Indeed, it would only result in an approximate 5 metres increase in height and a negligible increase in diameter around the shroud.
- 2.16 The same factors summarised above, i.e. the presence of existing vertical structures (lighting columns, telegraph poles), the presence of the existing base stations on the site for a number of years, and tall mature trees and landscaping, all mitigate the visual impact of the proposal. This is seen in the photomontages provided at Appendix 16.

- 2.17 Furthermore, it is important to note that the only reason that planning permission is required for the proposed new monopole is because the width of the new pole exceeds that of the existing pole by more than one third (see GPDO Part 16 A.1 (1)(d)(ii)). Comparison of the elevations set out in App 6 show that the only part of the proposed monopole where the width exceeds the existing by more than one third is the top 2.5m. In all other respects the proposed monopole would be permitted development. It is unreasonable to consider that this additional width (which is ca. 0.75m width compared to the existing 0.45m) for this limited part of the pole would have an unacceptable visual impact on the character of the immediate area. On this basis, it is considered that the proposed monopole will be assimilated into the street scene without causing undue harm to the environment.

Cabinets

- 2.18 The location of the proposed cabinets is shown in drawing 215 Max Configuration Site Plan (App 5). These cabinets are all required for the accommodation of the new equipment to provide the 5G services. In total the new base station will require 7 cabinets, to provide 2G, 3G, 4G and 5G technologies, resulting in a net increase of 3 cabinets. The number of associated cabinets is the minimum capable of supporting the required technologies for both operators. The proposed cabinets are similar in size to those existing (there is some variation but these are typically 1.5 m high x 1.1m long and 0.5-0.8m deep). The scale of the proposed cabinets are, therefore, modest and less than the statutory permitted limit of 2.5 m³. Other than for a solitary small BT Fibre cabinet they would also sit in close proximity to each other in a linear arrangement behind a retaining wall approximately 1.1m high, with a rendered finish. As a result, they would appear to be neatly contained within a small narrow area, that would not significantly clutter or impinge upon the green landscape character of the highway verge or the surrounding area.
- 2.19 Given the siting, scale and design of the proposed cabinets and the character of the locality, the cabinets should not be regarded as adversely affecting the character and appearance of the area.
- 2.20 It should also be noted that the proposed cabinets, in isolation, would constitute permitted development under the terms of the Town and Country planning (General Permitted Development) (England) Order 2016, as amended. Furthermore, no objections to the proposal, including any expressions of concern about the visual impact of the new monopole or cabinets, have been lodged by any consultee or neighbour.
- 2.21 The Council has also failed to substantiate how the small gap between the cabinets and the retaining wall would create potential for littering. Any littering would clearly not be as a consequence of a proposal for telecommunications equipment.
- 2.22 Taking all these factors together, it is considered that the proposal would not be unduly visually dominant nor would it be unacceptably visually intrusive nor unduly affect visual amenity along this part of Field End Road.

Traffic and Pedestrian Movement

- 2.23 The appellants concur with the view of the Council's Highway Engineer and the Case Officer in that as the proposal would be contained on the grass highway verge it would not affect pedestrian movement or have any other impacts on highway safety (see App 11).

Health

- 2.24 There have been no concerns raised by the case officer or any consultees regarding any potential impacts associated with either health or other environmental effects such as noise associated with the machinery at the base station. In relation to health matters, the proposal is ICNIRP compliant (App 9 and 15) and health issues are not planning considerations since they are addressed through other legislation. An updated ICNIRP associated with the revised plans is provided at Appendix 15. The applicants also adhere to advice provided by Public Health England.

Residential Amenity

- 2.25 It is recognised that the proposed development would face the front habitable windows of 590 Field End Road. However, it is located approximately 11 metres away from this property and the case officer accepts that the outlook from the ground floor window is already compromised by the hedgerow in the front garden. This window would therefore not be materially affected by the proposal. Although it is recognised that the proposed monopole would be clearly visible from the first floor windows of No 590 it would be seen against the backdrop of a number of tall trees,

telegraph poles and street lights in the vicinity. Whilst the monopole would exceed the height of these trees, it would not, for the reasons provided above, appear as a conspicuous, or visually intrusive feature that would dominate the outlook of No 590's first floor habitable windows. As a result it would not cause any demonstrable material loss of amenity for the occupier. Two other properties on the eastern side of Field Road will also look towards the monopole, but views from these properties will be around 30m away, with intervening trees, telegraph poles and lighting columns and they already look upon the existing monopole at an oblique angle. Other adjacent properties on this side of the road will have views at an oblique angle only. It is perhaps important to note also that the officer's report did not conclude that any of these properties would be materially affected by the proposed development.

Summary

- 2.26 The proposed development provides an important upgrade to telecommunications infrastructure in this part of Ruislip by improving both mobile telecommunications service capacity and enabling 5G networks in this area. This will support economic development and improve access for all sections of the community to a wide range of services and information. Upgrading ICT networks is a key national and local government objective.
- 2.27 The current appeal is for the re-use of an established telecoms base station. The design of the proposal is the minimum required to support the proposed technologies and full consideration has been given to the re-use of the existing base station and alternative options. The proposal will not unduly affect residential privacy, amenity or health, nor will it adversely affect access to public open space or protected views.

3.0 REVIEW OF PLANNING POLICIES

3.1 The reasons for refusal identify that the proposal would be contrary to Policy BE1 of the Hillingdon Local Plan: Part 1 Strategic Policies (November 2012) and Policies BE13, BE21 and BE37 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012). However, it identifies that the following policies are relevant to the decision:

- Policies AM7 and BE19 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).
- The London Plan-The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.
- Section 10 of the National Planning Policy Framework (2019).

3.2 It follows that from this that the case officer did not consider the proposed development to conflict with any of the above development plan policies/policy documents apart from Policies BE1 (Part 1) and BE13, BE21 and BE37 (Part 2).

3.3 The following sets out a summary review of the appeal proposal in terms of all of the policies referred to in the decision notice and selected other relevant policies. A further review of the proposal in terms of relevant policies and other material considerations is set out in App 7.

NPPF 2019

3.4 The NPPF 2019 places a high importance on the need to upgrade England's digital communication network and the promotion of economic growth. Key policy references are identified in the planning application Supplementary Information (App 6 pp11-12). In summary:

- Para 112 emphasises that *"high quality and reliable communications infrastructure is essential for economic growth and social well-being"* and that *"planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)"*.
- Para 113 advises that the re-use of existing masts and buildings should be encouraged and equipment should be well designed/camouflaged where possible.

3.5 The current proposal is for an important investment in upgrading the local communications infrastructure. Full consideration has been given to alternatives, including existing masts, and the proposal is considered to provide the best option in terms of meeting the technical requirements and minimising local impacts.

3.6 Improving the communications infrastructure is critical to supporting sustainable economic growth. Para 80 of the NPPF notes that significant weight should be placed on the need to support economic growth and productivity. Para 82 states that planning decisions *"should address and recognise the locational requirements of different sectors"* which will include the locational requirements of digital communications infrastructure.

3.7 **Conclusion:** the proposed development is strongly supported by the NPPF which identifies that weight should be attached to this type of investment. The proposal fully satisfies the NPPF's requirements to consider alternative locations for communications infrastructure including existing masts.

The London Plan 2016

Economy

3.8 **Policy 4.10 New & Emerging Economic Sectors** of the London Plan identifies measures that should be undertaken to promote new and emerging economic sectors including the evolution of London's science, technology, media and telecommunications sectors. Critical to the promotion of these sectors, and other research and development, is the provision of the highest quality digital communications network. The current proposal invests in this network to serve this part of Ruislip.

- 3.9 **Policy 4.11 Encouraging a Connected Economy** expands on this in relation to “*encouraging a connected economy*”. This states that all strategic agencies should “*facilitate the provision and delivery of ICT infrastructure* (Policy 4.11 A b)”. It has been demonstrated that the appeal proposal is well-designed and supports this policy.

Living Spaces and Places

- 3.10 **Policy 7.4 Local Character** states that design should have regard to the form, function and structure of an area, place or street (Policy 7.4A). Regarding planning decisions, it states that the design response should have regard to the pattern and grain of spaces and streets and other factors (Policy 7.4B).
- 3.11 It has been noted that the proposal respects and takes into account the existing structures, nearby residential properties and, more generally, the character of this area. The site is located within an area with strong vertical elements including established trees, lighting columns and telegraph poles. Indeed, the landscape officer commented that “*the verge is extensive and already has some telecoms equipment features whose presence is part-screened by roadside trees*”. The limited visual impact of the proposed development is seen in the photomontages provided in Appendix 17.
- 3.12 **Policy 7.5 Public Realm.** This policy identifies that the public realm should be accessible, connected and incorporate the highest quality design (among other factors). The proposal does not adversely affect pedestrian access in this area which is a view supported by the case officer and Council’s Highways Engineer.
- 3.13 **Conclusion.** The proposal will not conflict with relevant policies within the London Plan.

Hillingdon Council - Local Plan Part 1 - Strategic Policies

- 3.14 **Local Plan Policy BE1** seeks to improve and maintain the quality of the built environment in order to ensure that it serves the long term needs of its residents. Amongst other things, it requires all new development to enhance local distinctiveness, and be designed to be appropriate to the identity and context of Hillingdon’s buildings, townscapes, landscapes and views, having regard to its layout, form, scale and use of materials. It also requires that new developments should not result in the inappropriate development of green spaces that erode the character and biodiversity of suburban areas.
- 3.15 For the reasons set out in the previous section it is considered that the proposed development does not conflict with the requirements of this policy. It seeks to provide an upgrade to an existing telecommunications mast in an established location for the benefit of local residents and visitors to and through the area. Furthermore, it provides for new physical infrastructure that is required to meet future mobile telecommunications requirements. It is also noted that the case officer in the Delegated Application Report did not identify that the proposed development conflicted with this policy, although it is within the decision notice.

Hillingdon Council - Local Plan: Part Two- Saved UDP Policies

Policy BE13

- 3.16 Policy BE13 permits development where its layout and appearance harmonises with the existing street scene or other features of the area which the LPA considers desirable to retain or enhance. For the reasons provided in the previous section the proposed development is consistent with the principles set out in Policy BE13.
- 3.17 The proposed development is the minimum height and girth suitable to accommodate the required technologies due to the need to avoid interference, the general topography of the area and to comply with ICNIRP standards. Furthermore, the cabinets are the minimum number and size capable of supporting 2G, 3G, 4G and 5G technologies for both operators. No other suitable alternatives exist and the proposed mast is only 5m taller than that which already exists on this established telecommunications site.

Policy BE21

- 3.18 In seeking to safeguard the living conditions of existing residents, this policy only permits new buildings or extensions where their siting, bulk and proximity would not result in a significant loss of residential amenity.
- 3.19 The previous section demonstrates that the siting, bulk and proximity of the proposal in relation to the first floor front habitable windows of no.590 would not be so substantial as to cause an unacceptable loss of outlook or light. As a consequence, a significant loss of residential amenity would not occur and the withholding of planning permission on this basis would not be justified. The proposal would therefore not conflict with the requirements of Policy BE21 for the reasons outlined above.

Policy BE37 - Telecommunications

- 3.20 Policy BE37 supports the principle of telecommunications development providing that any apparatus is sited and designed so as to minimise its effect on the appearance of surrounding areas. However, it states that it will grant permission for large or prominent structures if:
- i.) *There is a need for the development in that location.* As the proposal comprises the re-use of an existing base station, which is the optimum solution, the locational need for the proposal has not been challenged by the Council and therefore satisfies this requirement.
 - ii.) *No satisfactory alternative means of telecommunications is available.* It has been demonstrated in the previous section of this statement that the proposed height and girth is the minimum capable of accommodating the equipment for the proposed upgrade of the telecommunications equipment and the introduction of 5G technologies to the area. No suitable alternative exists for the reasons outlined in paragraphs 2.3-2.7 above.
 - iii.) *There is no reasonable possibility of sharing existing facilities.* The proposal utilises an existing base station site and will be shared by two carriers. The case officer confirms in the report that the proposed development complies with this aspect of the policy and it is considered to be the optimum solution.
 - iv.) *In the case of radio masts there is no reasonable possibility of erecting antennae on an existing building or other structure;* As previously noted, the proposal utilises an existing telecommunications base. The case officer does not identify that the proposed development conflicts with this aspect of the policy.
 - v.) *The appearance of the townscape is not seriously harmed.* The proposal occupies a long-established existing base station, which forms a part of the context of the local area and townscape. There is screening provided from existing trees and landscaping and the presence of existing vertical features (notably lighting columns and telegraph poles) all contribute to mitigating any visual impacts. The photomontages provided in Appendix 17 also demonstrate that the proposed development will have a limited visual impact. The appearance of the townscape would therefore not be seriously harmed.
- 3.21 When taking all these factors in consideration it is concluded that the proposal complies with the requirements and objectives of Policy BE37.

Summary

- 3.22 The above review demonstrates that the proposed development supports, and is supported by, the provisions of the development plan and other material considerations.

4.0 CONCLUSION

- 4.1 This appeal relates to the refusal of planning permission by Hillingdon Council for a replacement telecommunications base station comprising a 20m monopole and associated equipment on land adjacent to Field End Road. This Statement has substantiated that:
- The proposal provides an important upgrade to the digital telecommunications in this part of Ruislip allowing the required additional coverage and capacity, including the introduction of 5G technologies to the area.
 - Upgrading existing ICT infrastructure, including provision of 5G technology, is a key Government aim which will support enhanced economic growth and social inclusion and well-being.
 - The appellants have considered a range of alternatives for the location of the upgrade including the re-use of the existing telecommunications mast, use of other existing masts and location on existing tall buildings. None of these alternatives have proved feasible for the proposed upgrade. The current proposal, which re-uses the site of the existing base station, is an appropriate and sustainable approach for achieving the proposed upgrade.
 - The proposed base station would be shared by two competing network operators.
 - The design incorporates the most up to date technologies available and the proposed mast is the minimum height and girth, with the minimum number of associated cabinets, capable of introducing advanced telecommunications services of the nature proposed, whilst also satisfying ICNIRP standards, for two operators. This will help to secure the economic future of the area and should enable more people to work from home.
 - The appeal site lies adjacent to a busy road and visual impacts are mitigated by a range of factors including, the existing telecommunications base station, landscaping and existing street furniture, which all form part of the established street scene. Direct views of the monopole from residential premises are limited by landscaping and the proposed development would not materially affect residential amenity or privacy to an unacceptable degree. The proposal will not therefore significantly harm the character of the local area nor will it affect local amenity.
- 4.2 The proposal strongly supports and is supported by the NPPF, Government policy, the London Plan and Hillingdon Council's Local Plan to upgrade existing ICT infrastructure and promote 5G telecommunications. Furthermore, it has been demonstrated that the proposal does not conflict with the provisions of other policies within the development plan.
- 4.3 Finally, the principle of a 20m monopole is permitted development under Part 16 of the GPDO. The only reason this proposal requires planning permission is due to the width of the upper part of the proposed monopole being more than one third greater than the existing monopole. This confirms that the proposal should be regarded as acceptable in terms of height and visual impact given that it is only slightly wider than the statutory permitted development rights for this type of development.
- 4.4 Moreover, there is an unchallenged need for EE (UK) Ltd and H3G (UK) Ltd to replace and improve the coverage and capacity for the 5G service. This together with the benefits of using an existing base station and mast sharing should be sufficient to outweigh any limited harm to the character and appearance of the surrounding area.
- 4.5 It is, therefore, respectfully requested that this appeal should be allowed and that planning permission be granted for the proposed development.