

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Park Inn Heathrow	Site Address:	Park Inn Hotel Bath Road West Drayton UB7 0DU
National Grid Reference:	507588, 177224		
Site Ref Number:	27296	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing sites)

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: N/A – Site upgrade.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: N/A – Site upgrade.		

Site specific pre-application consultation with local planning authority

Was there pre-application contact:	Yes	No
Date of pre-application contact:	N/A	
Name of contact:	N/A	
Summary of outcome/Main issues raised: Pre-application correspondence was sent to the London Borough of Hillingdon by email on 15 October 2020. No response has been received.		

Community Consultation

Rating of Site under Traffic Light Mode If Required:	Red	Amber	Green
Outline Consultation carried out: Pre-application consultation letters were sent by email on 15 October 2020 to the Heathrow Villages Ward Councillors – Councillors Milani, Money and Nelson.			
Summary of outcome/Main issues raised: No responses have been received.			

¹ Macro or Micro

School/College

Location of site in relation to school/college (<i>include name of school/college</i>): There are no schools close to the site, however there is a pre-school establishment approximately 130 metres away – Littlebrook Nursery on Sipson Road.
Outline of consultation carried out with school/college (<i>include evidence of consultation</i>): Correspondence was sent to the nursery by email on 15 October 2020.
Summary of outcome/Main issues raised: No response has been received.

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation

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: Correspondence has been sent to Heathrow Aerodrome Safeguarding, Heathrow Radio Approvals and NATS. Copies of correspondence and approvals included with the application documents.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	3 August 2021	

3. Proposed Development

The proposed site:

The existing installation on the site consists of 6 no. pole mounted antennas on the roof of the building along with transmission dishes, and ancillary equipment cabinets within an internal room in the building. The site provides 2G, 3G and 4G coverage for EE, and 3G and 4G coverage for H3G (trading as 3). There is also telecommunications equipment for other operators on the roof of the building.

The host building is a substantial building located on Bath Road, to the east of the M4 motorway. There are a mixture of uses in the area, including commercial and residential uses.

The proposal involves the removal of four of the existing antennas and their replacement with 4 no. new antenna apertures. The existing transmission dishes will remain. Five additional equipment cabinets are also proposed within the existing internal room (this element does not require consent and is not part of the application). The development would provide improved connectivity and network enhancement to the surrounding area for both EE and H3G, including new 5G coverage to the surrounding area.

The host building is shown on the photograph below:



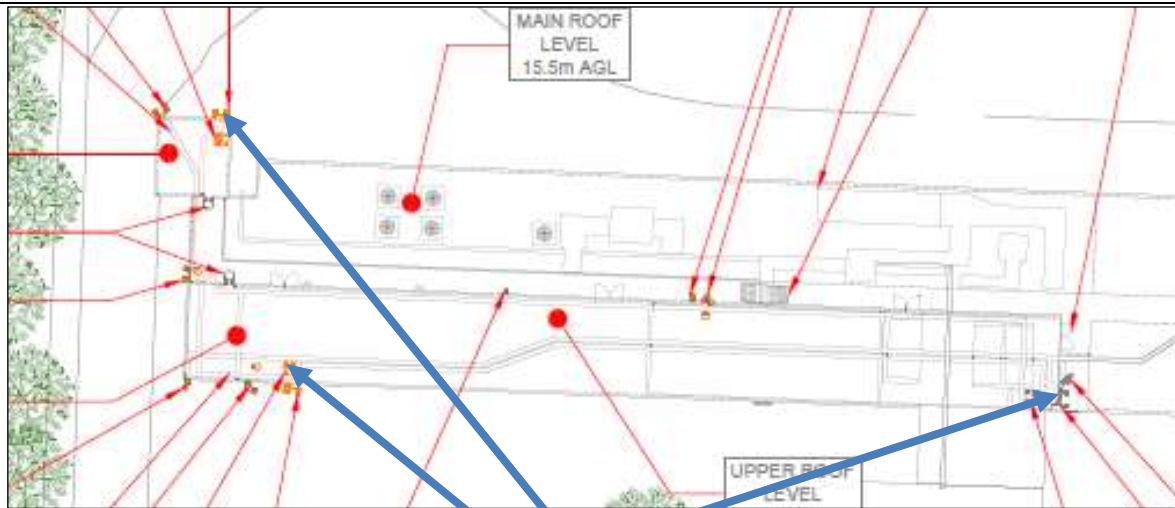
The original submission on October 2020 was not validated (application reference 195/APP/2020/3497). The application was not considered valid for the following reasons (set out below with a brief response to confirm how this has been addressed:

- Location plan not including a red line to the adopted highway – a red line around the site is not required for a Prior Approval application, therefore no amendments have been made to the drawings;
- Query regarding the address and property name – the road name has been amended to Bath Road;
- Confirmation of the antennas to be removed need to be shown on drawings – the drawings show sufficient information for the application to be valid, however the 'Reasons for choice of design' section below explains the proposed works;

- Details of the proposed cabinets not included on the submitted drawings – consent is not required for the cabinets within an internal room. This element of the scheme has now been removed from the description of development;
- Insufficient consultation undertaken in respect of the proximity of the site to Heathrow Airport – consultation has now been undertaken with Heathrow Aerodrome Safeguarding, Heathrow Radio Approvals and NATS. Copies of correspondence and approvals are included with the application documents.

Type of Structure (e.g. tower, mast, etc):		Rooftop
Description: The replacement of 4 no. antennas with 4 no. new antenna apertures and development ancillary thereto		
Overall Height:		22.2 metres to top of antennas
Height of existing building (where applicable):		18.2 metres
Equipment Housings:		
Length:		N/A – within existing equipment room.
Width:		
Height:		
Materials (as applicable):		
Tower/mast etc. – type of material and external colour:		N/A
Equipment housings – type of material and external colour:		N/A – within existing equipment room.

Reasons for choice of design:
In designing the proposed replacement installation, the applicant has sought to achieve a balance between technical requirements 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. There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signals, 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 links into the network either by fibre cabling or by dish antennas, power source (meter cabinet or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station. The application proposes replacement antennas on the roof of the building. The development would provide enhanced 2G, 3G and 4G coverage for EE and 3G and 4G for H3G, along with providing 5G coverage to the surrounding area. The drawing extracts below have been included to confirm the antennas to be removed and the new replacement antenna locations. The extracts are from drawings 100D (Existing site plan) and 215D (Proposed site plan).



Existing antenna locations



Proposed antenna locations

The extract of the existing site plan (top plan above) shows existing antenna locations and the plan below shows the proposed new scheme. It can be seen that the existing antennas on the western end of the building are proposed to be removed with their replacements further east on the building. The more eastern antennas are not affected.

The chosen design ensures impact is kept to a minimum. By utilising an existing rooftop site, for two Operators and for multiple technologies, the proposed development achieves a significant upgrade in coverage to the area with only a minimal additional visual impact. The antennas would be larger, however the additional impact would be minimal.

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

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, EE Ltd & H3G UK Ltd operates its networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of EE and H3G's networks, 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
---	-------------------	-----------

4. Technical Justification

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

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

The development is required to provide enhanced connectivity and network coverage to EE and H3G in the area, in particular by providing new 5G coverage. The first generation of services provided voice calls, the second generation (2G) allowed basic data such as texting and the third generation (3G) offered internet access and the development of apps. Since then, the smart phone has developed further and the fourth generation has brought video and much faster data speeds allowing the integration of the smart phone into wider use. The next generation of mobile telephony is 5G which brings greatly increasing data speeds. The advantages this presents range from near-instant downloads of HD films to connected cars, smart medical devices and smart cities. 5G is the next generation of mobile internet connectivity, offering faster speeds and more reliable connections on smartphones and other devices than ever before. Compared to even the most recent and
--

efficient generation of mobile network, 4G, 5G is set to be far faster and more reliable, with even greater capacity and lower response times.

As is often the case with the introduction of new mobile technologies, we are aware that there has been a lot of coverage on the internet and in the media with regard to the possible health implications of 5G rollout in the UK. Exposure to non-ionising radiation is regulated and limited and all UK base stations are required to comply with health and safety guidelines set by the International Commission on Non-Ionisation Radiation ('ICNIRP'). This is an independent body of scientists that was set up to provide advice and guidance on the health and environmental effects of non-ionizing radiation which is used in mobile telecommunications. The guidelines set by the commission are in place to protect all members of the public, of all ages and in all states of health and wherever they might be in relation to a base station for 24 hours a day. They are backed by the World Health Organisation, the EU and the UK Government.

The ICNIRP reviewed and updated their guidelines in 2020. The new guidelines provide better and more detailed exposure guidance in particular for the higher frequency range, above 6 GHz, which is of importance to 5G and future technologies using these higher frequencies. The ICNIRP chairman, Dr Eric van Rongen, has advised that "the most important thing for people to remember is that 5G technologies will not be able to cause harm when these new guidelines are adhered to". We confirm that they are adhered to by H3G as well as the UK's other mobile operators.

The Director of Mobile UK has also commented on the updated ICNIRP guidelines and stated that "*The consistent conclusion of public health agencies and expert groups is that compliance with the international guidelines is protective for all persons (including children) against all established health risks.*" (our emphasis).

Public Health England (PHE) commented in 2019 that "*It is possible that there may be a small increase in overall exposure to radio waves when 5G is added to an existing network or in a new area. However, the overall exposure is expected to remain low relative to guidelines and, as such, there should be no consequences for public health*" <https://www.gov.uk/government/publications/5g-technologies-radio-waves-and-health/5gtechnologies-radio-waves-and-health>

There has been a significant amount of other independent, peer reviewed, scientific research by recognised bodies that has been carried out into the technology used in mobile telecommunications over several decades. The consensus of the international scientific community is that there has been no convincing evidence to date that RF field exposure below the internationally agreed guideline levels applied in the UK (ICNIRP) causes negative health effects in adults or children. This includes recent reviews of 5G technology.

In January 2019 the Finnish Radiation and Nuclear Safety Authority (STUK) concluded that "*In the light of current information, exposure to radio frequency radiation from base stations will not rise to a significant level with the introduction of the 5G network. From the point of view of exposure to radio frequency radiation, the new base stations do not differ significantly from the base stations of existing mobile communication technologies (2G, 3G, 4G)*" <https://www.stuk.fi/aiheet/matkapuhelimet-jatukiasemat/matkapuhelinverkko/5g-verkon-sateilyturvallisuus>

Similarly, and also in January 2019, the Norwegian Radiation and Nuclear Safety Authority (DSA), commented that "*The overall research shows that the radiation from wireless technology is not hazardous to health, as long as the levels are below the recommended limit values. This is the prevailing view among researchers in many countries today, and it is supported by the EU Scientific Committee. We have used cell phones and radio 5G and transmitters for decades and much research has been done on how this affects our health. Risk factors of importance to public health have not been found. With the knowledge we have today, there is no need to worry that 5G is hazardous to health.*" <https://www.dsa.no/temaartikler/94565/5g-teknologi-og-straaling>.

All EE and H3G base stations are designed to be fully compliant with ICNIRP guidelines, and a certificate of compliance is included with the application. In addition, a document entitled 'Mobile Health Fact Sheet' is included with the application documents. This provides a simple explanation of 5G and the equipment

behind it, including the antennae and the masts, in particular in relation to health issues. In addition, further details of the new 5G technology are included within this application in the form of the '5G and Future Technology' document.

5. Site Selection Process

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

Site	Site Name and address	NGR:	Reason for not choosing
	N/A		

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

Paragraph 115 of the revised National Planning Policy Framework, in which the Government's supportive stance towards developing high quality communications infrastructure is laid out, states that "*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.*"

The proposal is for works at an established communications site and not for the development of a new installation, thus the consideration of alternative sites is not appropriate. The applicant has examined its portfolio of sites in this region and determined that there are no alternatives in the area which can be utilised to meet the specific technical requirement. The application site represents the only feasible option in this instance which allows the requirement to be met without the deployment of an additional base station in the locality.

Additional relevant information:

Siting and Appearance

It is considered that the proposed development is the least visually intrusive site and design available to the applicant which also ensures suitable continued and enhanced coverage can be provided to the area. The amount and scale of equipment proposed is the minimum to provide the proposed enhanced levels of coverage to the area. Although the proposed upgrade has larger antennas it is considered the development would not appear excessive. 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 setting.

New antennas are required because the existing antennas are not capable of providing the increased range of services from the site. To minimise impact, the height of the equipment has been kept to a minimum and equipment cabinets are proposed to be located within an internal room and will therefore not be visible.

Any impact would be outweighed by the significant benefits of the proposal, with two Operators achieving continued and enhanced coverage to the area. The site would provide coverage for both EE and H3G, therefore helping to keep the overall number of installations to a minimum. The alternative of providing separate installations for EE and H3G would have a greater overall impact.

On balance this proposed location is considered to be the optimum location in terms of siting and design, with the less than substantial harm it may impose on the surrounding area being balanced by the provision of replacement and enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2021) (NPPF)

The National Planning Policy Framework came into force in July 2018. The guidance has recently been revised. 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 proposed development will enable the provision of enhanced mobile communications services to the surrounding area, bringing about substantial public benefit both socially as well as the allowing for certain businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the 'virtual office', thus reducing the need to travel and contributing to the sustainability agenda.

Government advice in recent years has been to promote and encourage communications services. Within his presentation to Parliament in July 2015 of the Government report “Fixing the Foundations: Creating a more prosperous nation” the Chancellor of the Exchequer reiterated the importance of a high-speed digital communication infrastructure. *“7.1 Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.”*

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

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 114 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”*.

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 115 states that *“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”*.

By utilising an existing rooftop site to provide enhanced coverage for two Operators, the proposal is in line with the above policy.

It should be noted that paragraph 118 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”*.

The proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 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 the London Borough of Hillingdon, relevant to the proposal, comprises:

- The London Plan: The Spatial Development strategy for Greater London 2021;
- The Hillingdon Local Plan: Part 1 – Strategic Policies (2012);
- Local Plan Part 2 - 2020.

The London Plan

This revised guidance emphasises the importance of digital infrastructure. Policy SI 6 deals specifically with Digital connectivity infrastructure. The general aim of the policy is for new development to meet demand for connectivity. This is expanded upon in the supporting text for the policy. Paragraph 9.6.1 states: *“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.”*

Of particular relevance to the development is paragraph 9.6.6 which states: *“Access for network operators to rooftops of new developments should be supported where an improvement to the mobile connectivity of the area can be identified.”*

The revised guidance is clearly supportive of the proposal and the role that it will perform allowing EE and H3G to provide enhanced coverage to the surrounding area.

Local Plan

Most relevant to the proposal is policy DMHB 21 of the Local Plan Part 2 – Development Management Policies which deals specifically with telecommunications. For ease of reference the policy is copied below:

“Policy DMHB 21: Telecommunications

Telecommunication development will only be permitted where:

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

This is a proposal which achieves an enhancement of coverage to the area with only a minimal impact. This is aided by the fact that equipment cabinets are located within an internal room rather than on the roof of the building. Alternative sites have not been investigated as the site is on a substantial existing building and the upgrade can take place with only a marginal increase in impact. Use of the site to provide enhanced coverage negates the need for an additional site, and it is also noted that it is a shared development for two operators providing coverage for multiple technologies.

The building is not listed nor is it within a conservation area. Finally, the application includes a certificate confirming compliance with the International Commission on Non Ionizing Radiation guidelines.

The proposal therefore complies with the above policy and no conflict with any other aspect of the plan has been identified.

Summary

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for a continued and improved quality of service.

The specific requirement of the operators in this instance is to provide enhanced coverage to the area, with a minimal impact and without harm to the local environment. The proposed development is compliant with the NPPF. Thus, siting and design are considered the most appropriate solution to providing the coverage requirements to the area.

The proposal is fully compliant with ICNIRP guidelines.

Confirmation that submitted drawings have been checked for accuracy

Name (Agent):	Chris Andrews, Waldon Telecom	Telephone:	01932 411 011
Operator:	EE Ltd & H3G UK Ltd	Fax no:	01932 411 012
Address:	C/o Agent	Email Address:	chris.andrews@waldontelecom.com
Signed:	Chris Andrews	Date:	03/08/2021
Position:	Planner	Company (Agent): (on behalf of EE Ltd & H3G Ltd)	Waldon Telecom (Agent) Phoenix House Pyrford Road West Byfleet Surrey KT14 6RA