

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Ferrari House	Site Address:	258 Field End Road
National Grid Reference:	511149, 187568		Eastcote HA4 9UU
Site Ref Number:	98257	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	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 29 May 2020. To date no response has been received.		

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of Consultation carried out: Pre-application consultation letters were sent by email on 29 May 2020 to the Cavendish Ward Councillors – Councillors Barnes, Lavery and Makwana.			
Summary of outcome/Main issues raised: To date 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 a number of schools and pre-school establishments close to the site: • Little Companions Pre-School, Acorn Youth Club, Columbia Avenue, Off Beech Avenue, Eastcote, Middlesex, HA4 9SU • Our Children's Activities, Acorn Hall, Columbia Avenue, Eastcote, Ruislip, HA4 9SU
Outline of consultation carried out with school/college (<i>include evidence of consultation</i>): Correspondence was sent to the establishments on 29 May 2020.
Summary of outcome/Main issues raised: To date no responses have been received.

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	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response: N/A – Full planning application.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	N/A – full planning application	

3. Proposed Development

The proposed site:
Ferrari House is located on the western side of Field End Road, to the south of a tube line and Eastcote tube station. It is a 3-storey building with a plant room on the roof and is in commercial use. There are existing communications base stations on the roof of the building, one of which is a shared EE Ltd and Hutchison 3G UK Ltd (Trading as '3') installation. This shared installation consists of 6 no. pole mounted antennas, located on poles attached to the plant room towards the centre of the roof, and a large equipment cabin on the roof. There are also antennas located towards the edge of the building. These belong to another Operator and do not form part of this application. The area around the site has a mixture of uses. The host building is in commercial use, along with the buildings across Field End Road, where there are commercial uses at ground floor level with the upper floors in residential use. The building to the south is now in residential use. Eastcote tube station is located across Field End Lane to the north of the site and there is an industrial area to the north between the host building and the tube line. There is a further communications monopole in this area. The proposal involves the removal of four of the existing pole mounted antennas, along with radio equipment from inside of the equipment cabin. The remaining two antennas are proposed to remain, although in a relocated position. The four removed antennas are proposed to be replaced with four new antennas. Replacement radio equipment is proposed to be located within the existing equipment cabin. This development would provide improved connectivity and network enhancement to the surrounding area for both EE and H3G, including new 5G coverage.

The host building is shown on the photograph below:



This application is submitted following the refusal of a proposed upgrade in 2019 (application reference 21552/APP/2019/95). This previous application proposed to remove the antennas and replace them with a 7.5 metre high stub tower on the plant room. This development greatly reduces the impact of the development.

Type of Structure (e.g. tower, mast, etc):		Rooftop installation
Description: The removal of 4 no. antennas, relocation of 2 no. existing antennas and the installation of 4 no. new antennas on the roof of the building and ancillary development thereto.		
Overall Height:		17.7 metres to top of antennas
Height of existing building (where applicable):		12.8 metres (plant room level)
Equipment Housings (existing cabin to remain):		
Length:		3.6m
Width:		2.65m
Height:		2.4m
Materials (as applicable):		
Tower/mast etc. – type of material and external colour:		Support poles - steel with a galvanised finish.
Equipment housings – type of material and external colour:		Steel with a grey finish (existing cabin to remain and replacement equipment to be located within).

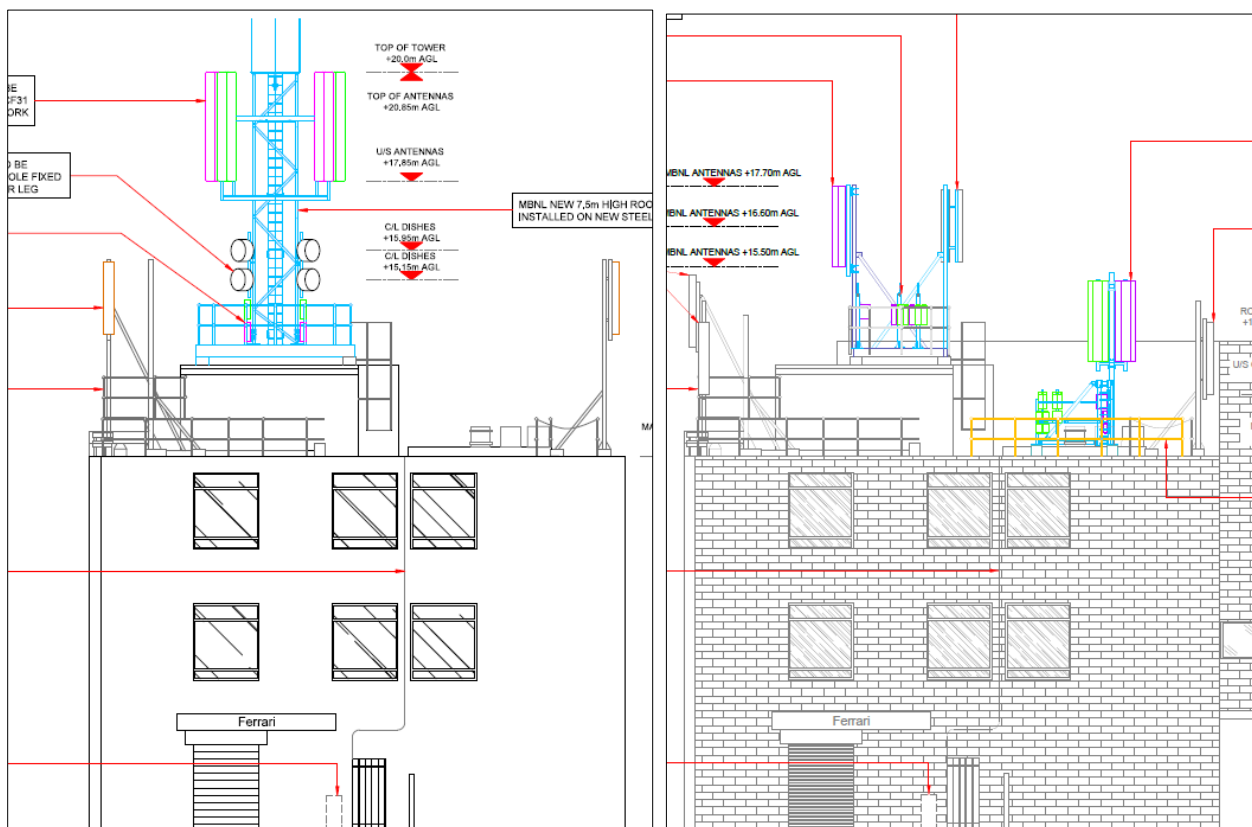
Reasons for choice of design:

In designing the proposed upgraded installation the applicant has sought to achieve a balance between the technical requirements of the Operators 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.

As noted previously, this is a resubmitted application following the refusal of an application in 2019 for an upgrade of equipment on the building. The previous application proposed to install replacement equipment on a stub tower on the plant room of the building. This application was refused as it was considered to have an unacceptable impact on the surrounding street scene.

The revised proposal removes the stub tower element of the proposal, and reverts to the use of antennas mounted on support poles to minimise impact. Extracts of the previously refused application and the current proposal are set out below to illustrate the reduction in the scale of the respective schemes:



The removal of the stub tower has allowed for both the overall height and bulk of the proposed development to be reduced. The height of the proposed equipment is reduced from 20 metres to 17.7 metres.

Although the scale of equipment is greater than the current development, the increase is much reduced. The overall height of the antennas now increases by 0.9 metres. Whilst this would have a minor impact

on the host building and surrounding area this is now considered to be a minimal increase, and not sufficient to cause harm to the host building or surrounding area. This minimal impact would be outweighed by the significant benefits of the proposal.

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).	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. 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.		

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 improved connectivity and network enhancement to EE and H3G in the area. As noted above, apart from providing 2G, 3G and 4G coverage, 5G coverage will be deployed from the site without the need for further changes to the site, ensuring Hillingdon benefits from the latest technology.

High quality communications infrastructure is essential for sustainable economic growth. High-speed broadband technology and other communications networks can play a vital role in enhancing the provision of local community facilities and services. Furthermore, mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

One of numerous benefits of this, on a wider scale, is that this allows for an increase in home working, by providing the opportunity to create a "virtual office", reducing in the need to travel for work as a consequence, which is helpful in supporting the sustainable development agenda.

The UK Government, recognising the benefits to commerce, industry and the public in general, places great emphasis on the benefits of mobile telecommunications to modern life. This position was reinforced by a statement made by then Prime Minister David Cameron in March 2016 when he specifically addressed the vital importance of mobile connectivity for residents and local economies and highlighted that the urgent delivery of the required network improvements is a Government priority;

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

Further details of the 5G network are set out in the document '5G Explanatory Note' which is included as part of this application.

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 113 of the National Planning Policy Framework, 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 telecommunications site and not for the development of a new site, 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 upgraded 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 location is the least visually intrusive site and design available to the applicant which also ensures enhanced coverage can be provided. The site is an existing rooftop communications site. The height and bulk of the building, and the other Operator equipment on the building, along with the revised design which now has a minimal increase in scale, would ensure the proposed development would not be seen as a prominent or incongruous addition to the building.

It is noted the final use of the equipment would provide coverage for two Operators and for multiple technologies – 2G, 3G 4G and 5G coverage would be provided. This accounts for the increase in scale of equipment required. An alternative would be to either propose separate installations for the two operators or an additional installation for the new technology. Proposing a slightly larger redevelopment of the site assists in keeping the overall number of installations to a minimum, and therefore also keeping the overall visual impact of telecommunications development in the area to a minimum.

In terms of heritage assets, the host building is not located within a conservation area, the closest being across the underground line to the north. Eastcote Underground Station, across Field End Road to the north of the site is a Grade II listed building. Due to the commercial nature of the host building and surrounding area, the distance between heritage assets and the site, and the intervening busy main road, there would only be a marginal impact on heritage assets. This impact would be outweighed by the significant benefits of the proposal.

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 host building or the surrounding area. The equipment would be visible, however its impact would not be excessive.

On balance this proposed location is considered to be the optimum location in terms of siting and design, with the limited harm it may impose on the surrounding area being outweighed by the provision of 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 (2019) (NPPF)

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

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

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

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

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

For **decision-taking** (paragraph 11) this means:

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

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

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

The proposed development will enable the provision of enhanced reliable mobile communications services to the residential and commercial areas surrounding the site, 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 (2019) directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

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

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

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 113 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 a building which is an existing telecommunications site, and providing coverage for two operators for multiple technologies from a single installation, the proposal is in line with the above policy.

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

In terms of heritage assets, section 16 of the guidance deals with 'Conserving and enhancing the historic environment'. Paragraph 184 sets out that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 196 states: "where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use." The minimal impact on heritage assets would be outweighed by the substantial public benefit of the proposal in terms of improved connectivity.

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

The London Plan

The London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In Paragraphs 1.38-1.41 'Ensuring the infrastructure to support growth', the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to secure its long-term growth.

It is considered that the applicants' network is an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in Policy 4.11 'Encouraging a Connected Economy' of the Plan, which states that:

"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 broadband access meeting the needs of 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."

At paragraph 4.55 of the supporting written justification to policy 4.11, the Mayor "wishes to ensure sufficient ICT connectivity to enable communication and data transfer within London, and between London, the rest of the UK and globally" and "...support ubiquitous networks – those supporting use of a range of devices to access ICT services beyond desk-based personal computers.." Furthermore, at paragraph 4.57, the Mayor states the intention to "...support competitive choice and access to communications technology, not just in strategic business locations but more broadly for firms and residents elsewhere in inner and outer London, and to address e-exclusion amongst disadvantaged groups."

Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing EE and H3G to provide enhanced high-quality 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:

- i) it is sited and designed to minimise their visual impact;*
- ii) it does not have a detrimental effect on the visual amenity, character or appearance of the building or the local area;*
- iii) it has been demonstrated that there is no possibility for use of alternative sites, mast sharing and the use of existing buildings;*
- iv) 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*
- v) it includes a Declaration of Conformity with the International Commission on Non Ionizing Radiation.”*

As noted above in this statement the scheme has been amended from a stub tower to lower and less bulky pole mounted antennas which will provide enhanced coverage to the area with a minimal impact. Impact on visual and residential amenity has been kept to an acceptable level by this revised design. Although alternative sites have not been sought for this enhanced coverage, the application site is suitable. 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. It is acknowledged that there is a conservation area close to the site, however the scale and design of the equipment ensures that the less than substantial harm to heritage assets would be outweighed by the substantial public benefits of improved connectivity. 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 continued connectivity to the area, with a minimal impact. This site achieves this aim. The proposed development is compliant with the NPPF. This siting and design are considered the most appropriate solution to providing the coverage requirements to the area. This revised proposal minimises impact whilst at the same time providing enhanced coverage.

The proposal is fully compliant with ICNIRP guidelines.

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