Design and Access Statement in Support of Full Planning

At

North Hyde

North Hyde Gardens

Hayes

Southall

UB3 4QS

PHOTOGRAPH OF EXISTING SITE

Telent
Rutland House
5 Allen Road
Livingston
EH54 6TQ

t: +44 (0) 1506 721023
e: martin.brown@telent.com
w: www.telent.com

Table of contents

Rev	Originator	Approved	Date
0	Name	Name	Day/Month/Year
1	Kirsty Stewart	Martin Brown	August 2024

1.0 Introduction

This Planning Supporting Statement has been prepared by Telent on behalf of EE Ltd – care of Wireless Infrastructure Group (WIG). The statement has been prepared in support of an application for planning permission that would see the installation at equipment at North Hyde, North Hyde Gardens, Hayes, Southall, UB3 4QS.

The proposal would comprise the following works;

- Sector 1 - relocation of 1 No. antenna to new support pole, and installation of 2No. new antenna on a new support pole.
- Sector 2 – installation of 2No. new antenna on new support pole
- Sector 3 - relocation of 1 No. antenna to new support pole, and installation of 2No. new antenna on a new support pole.

together with ancillary thereto development at the existing telecommunications facility.

The statement sets out the most relevant considerations in respect of the proposed development.

1.1 About Wireless Infrastructure Group

WIG is an independent provider of wireless infrastructure and Code Operator, working alongside most of the telecommunication service operators (all of whom are also Electronic Communications Code ('Code') Operators). The company was launched in 2006 and is head-quartered in Bellshill, Lanarkshire. WIG is backed by infrastructure investors and has major plans to invest in digital infrastructure to improve mobile and wireless connectivity in rural areas.

WIG does not operate a retail network of its owns and instead builds and operates wholesale infrastructure for the sole purpose of providing access to all wireless network operators on a shared basis. The four MNOs, together with over 100 other smaller networks, use our infrastructure to deliver

a wide variety of services ranging 2G, 3G, 4G mobile through to fixed wireless broadband, emergency radio services, broadcast and local wireless services.

WIG operates over 2,000 communications towers across the UK with over 50% located in rural areas. In Scotland, WIG's rural communication towers support an average of over four networks each, enabling transformational levels of connectivity for the communities they serve. International consultancy Ernst & Young highlighted in a recent report that the independent sector "can play a valuable role in promoting effective infrastructure use – enabling lower costs, increased coverage for remote areas, and increased retail competition for mobile services". Ernst & Young further noted that the sector has "a proven track-record in sharing towers with multiple network operators" and referenced evidence that independent towers enable 2-3x more connectivity than towers deployed by traditional network operators.

Supporting this application will therefore not only secure investment in a high-quality infrastructure asset for the community but also ensure that the tower is deployed by a Code Operator focussed on maximising the use of that infrastructure to enable ongoing improvements to connectivity over the long term.

1.2 The importance of mobile connectivity

The ability to access mobile data and voice services is an integral part of modern life. Mobile devices are relied upon by consumers and businesses. Mobile connectivity is no longer seen as a luxury: the ability to make calls, access the internet and receive e-mail and text is seen as a necessity. Businesses, large and small, need mobile connectivity to operate effectively and to compete in an increasingly global market. In an emergency, the public rely upon mobile devices to call for help and the emergency services rely upon mobile services to respond.

1.3 National Support for Modern Communications

There is significant UK Government support for the upgrading of existing 2G, 3G and 4G mobile coverage and delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. Our accompanying document of national policy **'National Policy - Delivering Ultra-**

Fast Broadband Mobile Connectivity', sets out how upgraded mobile connectivity will underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. It is essential that the planning system looks to support and facilitate new base station installations that would provide this upgraded coverage whereby there is no opportunity to upgrade any existing site, such as that proposed, in order to meet the Government's Digital Strategy. In addition, modern connectivity will be essential to help the Government meet its wider sustainability and climate change targets.

1.4 UK government policy on mobile infrastructure deployment

The UK government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks.

> *"The Government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile devices anywhere they go".* DCMS, May 2016.

The last few years have seen a number of UK-wide initiatives to improve coverage including:

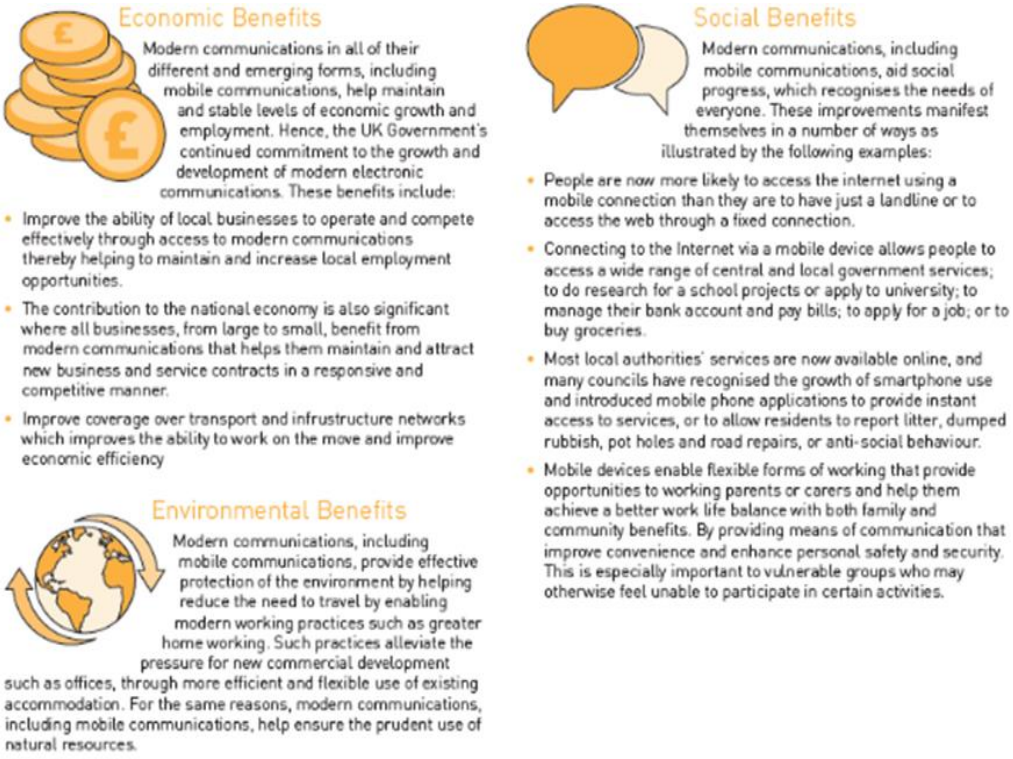
- Coverage commitments in the 4G LTE spectrum awarded to Telefonica O2 (February 2013) to deliver mobile broadband with 98% indoor premises coverage by the end of 2017
- National commitment by all four MNOs (December 2014) to deliver 90% geographic coverage by 2017
- Mobile Infrastructure Project (MIP) – investment by DCMS of up to £150m (to March 2016) in towers to deliver connectivity in complete mobile not spots.
- Changes to the Permitted Development rights afforded to communications code operators to allow new networks to be rolled-out more efficiently.
- Changes to the Electronic Communications Code (December 2017) to allow mobile operators to more easily roll-out new communications infrastructure.

1.5 Shared Access – The Benefits of Mobile Technology

Mobile phones and other similar communication devices are ubiquitous both for business and personal use. Mobile connectivity is now about fast, secure access to the internet anywhere. People and businesses are increasingly choosing to access the internet using a mobile device, and the numbers doing so are growing, as ownership of internet-enabled devices rises.

Smartphones are integral to people's lives as mobile devices supporting a growing range of functions from communication to navigation, to use as principle sources of news media, cameras, diaries and numerous other functions.

Overall, 94% of adults personally own/use a mobile phone with 52.4 million 4G mobile subscriptions. The proportion of adults in the UK with a smartphone has now reached 76% (as of 2017), with 18% of adults living in a mobile phone only home. Increasing coverage and take-up of higher speed 4G services is driving data use. The average volume of data consumed per subscriber per month is now 1.9GB.



Economic Benefits

Modern communications in all of their different and emerging forms, including mobile communications, help maintain and stable levels of economic growth and employment. Hence, the UK Government's continued commitment to the growth and development of modern electronic communications. These benefits include:

- Improve the ability of local businesses to operate and compete effectively through access to modern communications thereby helping to maintain and increase local employment opportunities.
- The contribution to the national economy is also significant where all businesses, from large to small, benefit from modern communications that helps them maintain and attract new business and service contracts in a responsive and competitive manner.
- Improve coverage over transport and infrastructure networks which improves the ability to work on the move and improve economic efficiency

Environmental Benefits

Modern communications, including mobile communications, provide effective protection of the environment by helping reduce the need to travel by enabling modern working practices such as greater home working. Such practices alleviate the pressure for new commercial development such as offices, through more efficient and flexible use of existing accommodation. For the same reasons, modern communications, including mobile communications, help ensure the prudent use of natural resources.

Social Benefits

Modern communications, including mobile communications, aid social progress, which recognises the needs of everyone. These improvements manifest themselves in a number of ways as illustrated by the following examples:

- People are now more likely to access the internet using a mobile connection than they are to have just a landline or to access the web through a fixed connection.
- Connecting to the Internet via a mobile device allows people to access a wide range of central and local government services; to do research for a school projects or apply to university; to manage their bank account and pay bills; to apply for a job; or to buy groceries.
- Most local authorities' services are now available online, and many councils have recognised the growth of smartphone use and introduced mobile phone applications to provide instant access to services, or to allow residents to report litter, dumped rubbish, pot holes and road repairs, or anti-social behaviour.
- Mobile devices enable flexible forms of working that provide opportunities to working parents or carers and help them achieve a better work life balance with both family and community benefits. By providing means of communication that improve convenience and enhance personal safety and security. This is especially important to vulnerable groups who may otherwise feel unable to participate in certain activities.

1.6 WIG commitment to the responsible development of wireless infrastructure

WIG is committed to the responsible development of wireless infrastructure, and explore all of the alternative locations in a given region and rank the options based on strict Town Planning criteria (visual amenity, impact on the local community), balanced against the physical requirements of the tower (radio plan coverage, backhaul line of sight, power and road access). WIG operate in accordance with the Code of Best Practice on Mobile Network Development (March 2022) including the commitments to maintain clear standards and procedures and continue to deliver, with other interested parties, high quality consultation with local communities; and to participate in appropriate pre-application consultation with planning authorities.

In the case of this site, the proposal would see the upgrading of an existing established base station site owned and managed by WIG. As such, there would be no requirement to look at any alternative sites in this instance, as the need to upgrade the existing site has been established. The proposed equipment upgrade would allow for additional capacity in this instance as a result of traffic growth.

2.0 Proposed Development

2.1 Site and Proposed Development

The site is accessed via North Hyde Gardens road and surrounded by a chain link fence . The immediate landscape setting is that of a mixed setting, with the host building a visually prominent element within the existing streetscene; residential to the west and an electric sub-station to the north, with the existing base station located on the roof of the building. The proposed equipment upgrading in this instance will have a minimal (if any) impact the immediate streetscene or on any residents to that which is already the case, due to the very small scale nature of the proposed works in this instance. The existing large stub tower on the roof of the building, to which the proposal does not relate to, would continue to be the prominent visual feature in the immediate and surrounding streetscene context.

The site location (and surrounding area) is shown in the image below by way of a yellow star for context.

Image 1: Existing/Proposed Site Location

The drawings submitted with this full planning application provide further details regarding the specific location, design and material specifications of the equipment.

The proposal is required in order to upgrade the operator's coverage/capacity within the locale and cell area. The ability of the building to host telecommunications equipment (as an existing 'base station' site) ensures that the number of masts needed within the locale are kept to a minimum in line with the NPPF, thus reducing any potentially perceived visual impact within the locale. In this instance, planning permission is only required given the number of existing antenna systems present on the building.

2.2 Application History

There is an existing telecommunications equipment located on the roof of the building, which has hosted such equipment now for a considerable period of time. On searching the Council's online planning search, despite this existing equipment being present, it was not possible to easily identify any previous applications submitted at the site, although it is understood that such previous applications would have been submitted.

2.3 Alternative Site Assessment

As the proposal would see the replacement/upgrading of equipment at an established telecommunications site and not the development of a new site, the consideration of alternative sites is not appropriate in this instance. As a result, it is therefore considered that the principle of telecommunications development at this location is acceptable as the site would represent a suitable location, which the Council have previously supported telecommunications development on, a search for alternative sites would not therefore be required in this instance.

Furthermore, given that this proposal will utilise an existing base station in order to minimise the spread of masts across the area, there is no need for discounted options in this instance. This is consistent with Para 18 of the Code of Best Practice for Wireless Network Development in England, which states that;

Site sharing and use of existing infrastructure: make use of existing structures, ***sites*** *[emphasis added] and masts possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and* ***sites*** *[emphasis added] 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.*

Such matters in relation to siting are also addressed under para 25 of the Code, whereby it again highlights the weight given to utilising existing bases station sites as follows;

Sharing sites/masts: sharing sites should always be considered as this reduces the total number of sites/masts required for the network and also minimises the visual intrusion caused by wireless infrastructure. This may involve redeveloping an existing site, including installing a replacement mast that can accommodate additional radio equipment.

In addition to the above, it should be noted that the applicant has examined its portfolio of sites in this area and determined that there are no other viable alternatives in the area which can be upgraded to meet the specific technical requirement in this instance. The application site, therefore, represents the only feasible option in this instance which allows the requirement to be met without the deployment of an additional site to host the equioment that would be required in the locality.

2.4 Technical Justification

Coverage Services

2G (GSM) allows for basic voice calls and text services. 2G operates using lower frequencies than 3G and 4G. These lower frequencies have longer wavelengths which are more resilient to physical obstructions and will, in general, cover larger geographical areas. This contributes to the fact that 2G coverage is often more commonly achieved in rural or remote areas than 3G or 4G.

3G (UMTS) is a more efficient technology than 2G for voice communications and also allows for data transmission as well as text services as mobile phones, computers, and other portable electronic devices access the internet wirelessly.

4G (LTE, the acronym used for ‘Long Term Evolution’) supports mixed data, voice, video and messaging traffic and offers speeds of up to five times faster than 3G, enabling network users with 4G devices to benefit from ultra-fast internet browsing, video streaming, gaming, e-mail and downloads.

5G is the next generation of mobile technology. It is likely to be deployed as an intricate patchwork of technologies, including advanced LTE, Wi-fi and New Radio, and will utilise a range of spectrum frequencies including re-farmed existing bands, new bands (below 6 GHz) and mmWave spectrum.

3.0 Planning Policy

This section sets out the most relevant national and local planning policy concerning the proposed development.

3.1 General Policies

National Planning Policy Framework (2023)

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The NPPF is pro – development with a *'presumption in favour of sustainable development' seen as a golden thread, running through both plan making and decision taking'*. The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

In this regard the Framework can be summarised as follows:

- Government policy is to support high quality communications infrastructure and systems as essential for sustainable economic growth;
- Government policy is to keep the inevitable environmental impact associated with electronic communications development to a minimum;
- The best way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites;
- The starting point for planning new networks or the expansion of existing networks is therefore to use existing electronic communications sites as and when applicable;
- The emphasis on minimising environmental impact is greater per the sensitivity of the site. The emphasis on exploring and utilising site sharing opportunities is consequently higher in these circumstances;

The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. This is

emphasised in paragraph 10 of the NPPF, which states that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. The NPPF recognises that this is especially relevant where a development might have other significantly important benefits such as being essential to meet, for example, enhancement and improvement to existing communications infrastructure.

Paragraph 11 of the NPPF state that for 'decision-making', the presumption in favour of sustainable development means approving development proposals that accord with an up-to-date development plan without delay; or 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.*

As such, development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully will all relevant Development Plan and NPPF policies and, therefore, permission should be granted for the development. The importance of the proposed development in providing the upgrading and expansion of the existing communications network is clearly an important material planning consideration as it directly supports sustainability and is also precisely the type of new digital infrastructure that the NPPF is seeking to support. The development proposed is small scale, sited where the principle of telecommunications development has been long established and therefore accepted, designed in a way that is predominately consistent with the existing infrastructure setup and so should be acceptable in every respect.

However, for completeness we still highlight some of the key points within the NPPF as they help demonstrate why the application should be permitted:

Paragraph 7 advises that the purpose of the planning system is to contribute to the achievement of sustainable development. It then states that*: "At a very high level, the objective of sustainable*

development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs." [our emphasis];

Paragraph 20 advises that strategic policies should *"make sufficient provision for … telecommunications"* and that it should *"be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances"*

Paragraph 38, on "decision-making" states that authorities should *"work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible".*

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 85 states: *'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation[44]'*...

Footnote 44 of the NPPF states: *'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'.*

The NPPF (2023) 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 118 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. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time……".* This wording echoes guidance set out in previous versions of the NPPF. However, unlike the previous version it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

While supported, paragraph 119 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion [our emphasis].

Paragraph 122 retains the guidance set out in previous versions of the NPPF version and 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".*

As can be seen from the above, the NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this must include an understanding of the associated special problems and technical needs of developing and upgrading communications networks.

Public benefits are defined within the NPPF and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Public benefits are defined within the NPPG and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. However, in this instance, given the existing equipment is being upgraded to provide better coverage to the area the benefits of the works are unquestionable. The proposed development accords with all these aspects of the NPPF, particularly as the proposal is for the replacement of existing antenna at a site that has supported such infrastructure now for a considerable period of time, and not therefore the addition of a new base station installation. Furthermore, the replacement equipment will ensure the operator continue to provide good and improved network provision within the town and surrounding areas, bringing a range of associated economic and technical benefits.

Code of Best Practice on Mobile Network Development in England (March 2022)

The Code of Best Practice has been fully revised in March 2022 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information superhighway no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2016).

The principal aim of this Code is to support the government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

The development of such infrastructure must be achieved in a timely and efficient manner, and in a way, which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. The Code also has an important role in making sure that appropriate engagement takes place with

local communities and other interested parties. The Code also highlights that wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT)and Smart City applications.

The Code highlights that local planning authorities should support the deployment of digital infrastructure by:

- Incentivising connectivity: support the expansion of telecommunications networks and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.
- Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.
- Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.
- Information and communication: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives).

The Code highlights the Government's Communications Policy and Planning Policy. It acknowledges that digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code indicates that recent changes in planning policy [and regulation] are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed. Furthermore, Section 2 of this Code also reiterates NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth.

The Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time due to changes in technology and associated changes in demand. The Code acknowledges that all wireless network installations are principally guided by the technical need for the site and the technical constraints placed upon transmitting a signal. It then goes on to state that *"the three primary technical and operational considerations for installation sites are: ensuring that wireless infrastructure provides an appropriate level of coverage over the intended geographical area; ensuring that sites have sufficient capacity to meet user demand; and requiring a connection to the wider network 'backhaul".*

It then goes onto state that *"With the introduction of 5G, more equipment will be required to provide coverage and capacity. 5G, as well as 4G, are data-driven technologies, and high volumes of data will be transmitted between base stations and wireless devices. 5G will require a denser network of base stations than previous generations, including more fixed line fibre optic cable for reliable and high capacity backhaul. The siting of 5G installations will be more constrained and guided by these special technical and operational considerations.*

Due to the scale and technological constraints of 5G equipment, in some cases previous camouflage design solutions, such as tree mast designs and concealing antennas in flagpoles, may not be practicable or suitable. In these cases, simple designs with particular attention to colouration and finishes may help reduce visual impacts on a site-specific basis".

In acknowledging the considerations of new technology such as 5G, the revised Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity needs to be enhanced in line with Government commitments and customer demand. Similarly, some new sites will be required to replace existing sites that are lost, for example, through redevelopment of an existing building. Some masts may need to be redeveloped or replaced to enable an upgrade in services to take place.

Section 5 relates to mobile connectivity in the 21st Century, explaining that mobile phones and other devices are now everywhere. Mobile connectivity is not just making calls and texts but also mobile broadband. The majority of mobile phones in the UK are Internet enabled smartphones and large

numbers of people also now own tablet devices. People are increasingly choosing to access the internet using a mobile device even when they have fixed broadband connection available.

The Code acknowledges that by the second decade of the 21st Century, the greatest increase in traffic across mobile networks was in data i.e., internet use (para 5.3). Paragraph 5.4 states that in terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5% in the Gross Domestic Product per capita, while another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade. Section 5 of the Code goes on to highlight that connectivity promotes social inclusion. In recent years, more people rely on a mobile phone than they rely on a landline. Furthermore, people on lower incomes are even more likely to live in a mobile only household, or to access the Internet using a mobile connection (para 5.5).

The Code highlights that planning authorities, and those who represent rural areas, should recognise the importance of access to reliable mobile broadband and services for those who live and work in rural communities, including coverage for the emergency services network. The benefits of high-quality wireless connectivity to the rural economy are far reaching - better wireless infrastructure will give rural communities greater choice and access to services, allow businesses to grow, and have positive impacts on healthcare, education, tourism, and remote working.

Additionally, as set out above, Para 18 of the Code of Best Practice for Wireless Network Development in England, which states that;

> *Site sharing and use of existing infrastructure: make use of existing structures,* ***sites*** *[emphasis added] and masts possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and* ***sites*** *[emphasis added] 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.*

Such matters in relation to siting are also addressed under para 25 of the Code, whereby it again highlights the weight given to utilising existing bases station sites as follows;

Sharing sites/masts: sharing sites should always be considered as this reduces the total number of sites/masts required for the network and also minimises the visual intrusion caused by wireless infrastructure. This may involve redeveloping an existing site, including installing a replacement mast that can accommodate additional radio equipment.

Planning Advice Note: PAN 62 Radio Telecommunications

PAN 62 refers to Radio Telecommunications and states that the NPPG (now superseded by the SPP and FPF3) considers the general siting and design principles for telecommunications. It states that such development should be undertaken in a manner that minimises environmental impact and should have a sensitive design in both urban and rural areas.

Paragraphs 8 – 17 of Planning Advice Note 62: Radio Telecommunications broadly explain how mobile networks operate. Although the operators' networks are mature, improvements, upgrades and new sites are required for their networks for a number of reasons. For example, to increase capacity in an area of high demand, to provide new or improved network coverage in terms of quality as well as extent, or perhaps to provide coverage over a new development area such as a new housing estate or industrial park.

Paragraph 32 identifies two components associated with minimising the contrast between telecommunication equipment and its surrounding as; minimising the contrast between equipment and people's expectations of a particular scene and minimising the contrast between equipment and its immediate setting of background. For example, a lattice tower generally fits the expectations within industrial landscapes.

Paragraph 33 further identifies ways in which to minimise these contrasts as follows;

- select a shape and material appropriate to the character of the area;
- keep the shape simple with clean lines, and fit all the elements, such as antennas, cables and ladders within the visual envelope of the basic shape;

- develop a composition where the properties seem in proportion and balanced, for example masts that taper to the top are usually more acceptable;
- minimise the number of separate visual elements in a base station; and
- use regularity, order and symmetry in positioning equipment.

Furthermore, para 34 identifies a series of options that should be considered as a guide in selecting the siting and design of telecommunications equipment in order to minimise any resultant visual contrast. The implementation of telecommunications equipment is site-specific and therefore should be considered against the site conditions and coverage capacity requirements in addition to technical constraints and landscape character. The series of options is therefore a guide or checklist rather than a sequence to be rigidly followed. The options are:

- installing small scale equipment;
- concealing or disguising equipment;
- mast sharing;
- site sharing;
- installing on existing buildings or other structures; and
- erecting a new ground based mast.

As can be seen from the above, the proposal would result in the upgrading of an existing installation at an established telecommunications building. Viewed within the context of this established use, where such telecommunications development would not therefore be seen as being visually incongruous, the equipment would be very much viewed within the context of the existing and established site arrangement, ensuring that any impact is minimised as far as is practicable. The proposal would therefore be consistent with National policy guidance as set out above.

Local Planning Policies

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that *"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts*

the determination must be made in accordance with the plan unless material considerations indicate otherwise".

The statutory development plan as defined by the Planning and Compulsory Purchase Act 2004 comprises the London Borough of Hillingdon Local Plan Part 1 (Strategic Policies – adopted 2012) and Part 2 (Development Management policies – adopted 2020).

London Borough of Hillingdon - Local Plan Part 1 and Part 2

The Local Plan Part 1 sets out the overall level and broad locations of growth up to 2026 within Hillingdon. It comprises a spatial vision and strategy, strategic objectives, core policies and a monitoring and implementation framework. These policies are supported by more detailed policies and allocations set out in the Local Plan Part 2.

The Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations and the Policies Map. Once adopted, it will deliver the detail of the strategic policies set out in the Local Plan Part 1.

The Local Plan Part 2 Development Management Policies and Site Allocations and Designations were adopted as part of the borough's development plan at Full Council on 16 January 2020. This replaces the Local Plan Part 2 Saved UDP Policies (2012).

In relation to the proposed development policy DMHB 21: Telecommunications is of particular relevance to the proposal. While the introductory text for this policy highlights the objectives of the NPPF with regards to the need to promote and support the development of advanced, high quality communications infrastructure to promote sustainable economic growth, this reference to the NPPF relates to a previous version of the document, which has since been amended a number of times. However, what is relatively consistent is that the national guidance continues to advise that masts and associated installations should be kept to a minimum and that existing masts, buildings and other structures should be used unless the need for a new site has been justified.

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.*

3.3 Planning Assessment

The special operational and technical factors that require specific siting of base stations should be balanced by the need to minimise environmental and visual impact.

However, there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs, the NPPF now applies a reduced policy test compared to previous guidance. This helps clarify that an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.

As noted in previous sections, upgrades to existing equipment are required in this instance to improve the coverage/capacity of the equipment in the cell coverage area. The base station has hosted equipment previously and as such there is a history of telecommunications at the site. The equipment proposed would see a very small-scale change visually to that of the existing equipment

at the site, with the relocation of a total of 2 No. antenna to new support pole, and the installation of a total of 6 No. antenna. The visual change would be minimal in this instance and when considering that the existing stub tower on the roof would remain the prominent feature within the immediate or surrounding streetscene, the proposal would clearly constitute and remain, a visually subservient form of development in this instance. Consequently, given the small-scale nature of the proposal when considering the existing rooftop development, there would be no significantly enhanced visual impact with the addition of a number of new antennas on the roof of the building, which has accommodated such equipment now for a considerable period of time.

As such, given the very small-scale nature of the proposal, the development would not have a detrimental effect on the visual amenity, character or appearance of the building or the local area and in this instance in line with the NPPF and the Hillingdon Local Plan. Additionally, as the site hosts existing telecommunications equipment and the new antenna would be at a similar height to that of existing antenna on the roof of the building and not therefore a new site, then there should be no requirement for an ICNIRP declaration in this instance.

As stated previously, the proposal would look to utilise and upgrade an existing and established base station site, thereby ensuring that the number of sites is kept to a minimum consistent with the needs of the operators and sequential approach at both national and local levels.

As with any form of telecommunications development, the visual impact of such proposals is a key material consideration. When seeking approval for the installation of new telecommunications equipment, the Council will require that the applicant has demonstrated they have taken all reasonable measures to minimise the visual impact of the proposed development on the local environment, as far as is practicable. It is of our consideration that this requirement has been met in locating the proposal within the limits of an existing and longstanding base station site in line with the NPPF.

4.0 Access

The site is located via North Hyde Gardens road. There would be no change to the existing access arrangement to the site and as such access requirements are not considered an issue. The site is also enclosed by way of a chain link fence.

Once installed, the development will be unmanned requiring only periodic visits for routine maintenance and servicing, in line with existing equipment at the base station site.

In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base station sites are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

5.0 Health and Safety

Telecommunications planning guidance states that it is not for the local planning authority to seek to replicate through the planning system controls under the health and safety regime as it is a matter for the Health and Safety Executive.

The Government guidelines state that provided a proposed base station meets the ICNIRP guidelines for public exposure, then it should not be necessary for the local planning authority to consider the impacts of health concerns.

As this is an existing base station site and not therefore a new site, then there would be no need for any new ICNIRP declaration in this instance.

6.0 Conclusion

The requirement for new infrastructure in this area is to provide improved mobile phone coverage for local residents, visitors, and businesses due to coverage/capacity issues associated with the existing infrastructure. The existing and improved base-stationsite would continue to provide the latest communication services for surrounding businesses and local residents and would therefore deliver the Government's objective of the public having access to a choice of high-quality electronic communications services.

The telecommunications installation proposed as set out in this application has been designed and sited having regard to technical, engineering and land use planning considerations in order to minimise its impact on the local environment. The antenna height is the minimum required in order to ensure operational efficiency and the location on the existing building which has hosted such equipment for a considerable period of time, will ensure there would be no significant increased visual presence and impact in this instance.

National planning policy is to facilitate the growth of existing and new telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This development proposes an upgrade to existing coverage to the surrounding area to provide modern technologies and frequencies, including 5G, as well as a required increase in capacity for existing technologies.

The NPPF is clear that the use of building, is preferred over the installation of a new ground-based site, whereby the visual impact on the street scene would minimal. This is preference for a sequential approach to development is also set out within the Code of Practice for Mobile Network Development in England (2022) which is published by DCMS. The proposal would see the upgrading of an established base station on the roof of the building and therefore meet with these aims.

To upgrade the operator's capacity, modern equipment is required to accommodate the increased equipment. The dimensions of the equipment and its quantity have been kept to technical minimums.

As a result, the Council are requested to give all of the above matter's due consideration and timeously grant this application, subject to the attachment of any planning conditions that may be required to support the development.