

Supplementary Information

1. Site Details

Site Name	Coldharbour Lane House	Site Address	Coldharbour Lane House 105 – 126 Coldharbour Lane Hayes London UB3 3HD
NGR	E: 510097 N: 180104		
Site Ref Number	HGN044	Site Type	Rooftop Upgrade

2. Pre-Application Check list

Site selection

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 – upgrade of existing communications site		
Was the industry site database checked for suitable sites by the operator?	Yes	No
if no explain why n/a – upgrade of existing communications site		

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation	17 th December 2020
Was there pre-application contact	No
Date of pre-application contact	
Name of contact	Head of Planning
Summary of outcome/Main issues raised To date no response has been received	

Ten Commitments Consultation

Rating of Site under Traffic Light Model	Red	Amber	Green
Outline Consultation carried out: This proposal was given a Green Traffic Light Rating in accordance with the guidelines set out in the Code of Best Practice on Mobile Network Development in England. On that basis, consultation was only undertaken with the local planning authority.			
Summary of outcome/Main issues raised n/a			

School/College

Location of site in relation to school/college (include name of school/college): There are no schools in the immediate vicinity that have a functional relationship with the existing rooftop telecommunications site
Outline of consultation carried out with school/college: n/a
Summary of outcome/Main issues raised n/a

3.0 Proposed Development

The proposed site

The application site relates to an established telecommunications installation found on top of Coldharbour Lane House located at the junction of Coldharbour Lane and Hunters Grove. For illustrative purposes only please see below a photograph of the building.



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

Description:

The relocation of existing 2 no. antennas and installation of 4 no new antennas on new antenna poles on the existing Stub Mast and associated ancillary development.

Overall Height:	18.67 metres
Height of existing building (where applicable)	13.27metres
Equipment Housing	Internal Equipment Cabin
Materials (as applicable)	Galvanised Steel Grey
Tower/mast etc – type of material and external colour	Galvanised steel
Equipment housing – type of material and external colour	Galvanised Steel Grey

Reasons for Choice of Design:

The design of the proposed upgrade is influenced by the existing communications base station in situ. The height of the existing and proposed antennas has been increased to gain clear visibility over the edge of the building and to allow the signal to propagate over the target area, whilst at the same time complying with ICNIRP guidelines. Given the height of the building the lowest possible antenna height is being progressed to meet the new ICNIPR clearance guidelines and the technology coverage demands in the surrounding area and fit into the surrounding network of sites. Any decrease in antenna height would result in a reduction in the coverage footprint to the surrounding area which may result in the need for another new base station in the area to fill the coverage gap. The height and amount of equipment proposed helps to prevent the proliferation of communications sites in the area; thereby minimising impact on the character and appearance of the area, and is compliant with both local and central government planning policies and guidelines.

The number of antennas and amount of ancillary equipment proposed is the minimum requirement to provide high quality 5G coverage to the surrounding area. The new antennas are greater in scale and number than the existing due to the higher technical capability of the equipment.

In light of the above, it is considered that the design of the proposed upgrade of the existing Telecommunications Installation and the ancillary development associated with the upgrade, will have a minimal impact on the character and visual amenity of the area. The proposal will help to achieve the Government's aim to provide high quality and reliable communications infrastructure and support the expansion of 5G electronic communications networks. The local area will benefit from the 5G coverage whilst ensuring that the current level of coverage is not impacted on.

4.0 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 (UK) Ltd and H3G (UK) Limited operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of EE (UK) Ltd and H3G (UK) Limited's network, 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
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Frequency	GSM 1865.5-1846.5 MHz
Modulation characteristics ¹	GMSK & QPSK
Power output (expressed in EIRP in dBW per carrier)	56 dBm
Height of antenna (metres above ground level)	18.75m

¹ The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase Modulation. The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation.

5.0 Technical Justification

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

The proposed upgrade at this established communications site is necessary to provide the surrounding area with the latest 5G technology. The growth of digital connectivity over the last few decades has transformed all aspects of life in the UK and provided the opportunity to word differently, to socialise and interact differently, to bring the world closer and to offer new commercial opportunities. The next generation of 5G coverage offers download speeds far in excess of what has been achieved to date, which results in a vast array of advantages and opportunities. Some of the examples that will emerge from 5G coverage includes, connected and autonomous vehicles; smart traffic management; smart manufacturing; autonomous machines; advanced medical devices; automated agriculture; and greater security provision.

5G operates across multiple spectrums and therefore requires additional antennas and new equipment cabinets to be added to existing base stations to provide the benefits of 5G coverage to the surrounding area.

6.0 Site Selection Process and Planning Assessment

Site Selection Process:

In accordance with Section 10 of NPPF 'Supporting High Quality Communications', paragraph 113 confirms that the number of radio and electronic communications sites should be kept to a minimum consistent with the needs of consumers, efficient operation of the network and providing capacity for future expansion and that the;

"Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged."

In accordance with Government Planning Policy, the proposal subject of this planning application involves upgrading an existing and established rooftop communications site, thereby assisting in keeping the number of communications sites to a minimum. On that basis, no alternative site options were considered before progressing with this upgrade proposal.

Planning Policy and Assessment:

National Planning Policy Framework – Supporting High Quality Communications – Feb 2019

Section 10 of the NPPF published in February 2019 provides very strong support for the provision of high quality communications as follows:

Paragraph 112 states:

"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; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution)."

Paragraph 113 continues:

"The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate." Operators always follow the sequential site

selection process. Where an existing site can be shared or upgraded this will always adhered to before a new proposal is put forward for consideration”.

The support for telecoms and the need not to constrain Operators is laid out in Paragraph 116

“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.”

A signed ICNIRP Compliance Certificate is included within this application

UK Digital Strategy 2017

The Department for Digital, Culture, Media & Sport published the UK Digital Strategy in 2017 which includes many aspects that are relevant to this application. One of the main strands of the Digital Strategy is to build world-class digital infrastructure for the UK:

“For businesses to thrive and grow, government needs to create the conditions and set the framework for investment in widespread and up-to-date infrastructure. Digital infrastructure is a critical component of this: digital connectivity is now a utility, and modern life is increasingly impossible without it. Connectivity drives productivity and innovation and is the physical underpinning of a digital nation.”

It confirms the Government’s strategy in relation to 5G Technology as follows:

“5G is the next generation of mobile connectivity and is currently in development. It is expected to represent a significant upgrade: providing ultrafast, low latency, and more reliable mobile connectivity, able to handle our ever-increasing data requirements. This should present huge opportunities to boost productivity and grow the economy. In addition to giving consumers and business users high quality connectivity, it will also support the development of the Internet of Things: the rapidly-increasing number of connected devices, from connected cars to digital health applications. We want the UK to take a leading role in the development and roll-out of 5G. If the UK is going to be at the forefront of the 5G revolution it will require concerted action from government, industry, academia and local areas both to develop the technology and deploy the networks to support it.”

Development Plan

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.*

Planning Assessment

It should be recognised that irrespective of the installation’s use as a communications base station, changes to an existing structure within any environment will always be, to some degree, a noticeable addition to when viewed from the surrounding area. However, it should be appreciated that the visibility of a development does not automatically result in an overwhelming adverse harm occurring.

The fundamental principle applied by the applicant is always to minimise the contrast between the communications equipment and its surroundings through, where practicable, appropriate siting and design.

The siting of the existing communications base station is already established, and the proposed upgrade of equipment is the most effective way to deliver the Government's aim for the UK to be at the forefront of the 5G revolution. The upgrading of an existing communications base station also accords with Government policy to keep the number of separate base stations to a minimum.

The technical limitations and operational requirements of the equipment also need to be borne in mind when assessing the application and the case should concentrate on whether the minor impact associated with the proposed upgrade outweighs the benefits that the 5G network will bring to the UK population and economy.

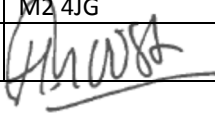
As discussed previously, the justification for the proposal's height is that the antennas need to clear the building edge and of a height in order to function and project the necessary signal across the target area and to comply with ICNIRP Guidelines on exclusion zones. The design of the upgrade to accommodate 5G equipment is influenced by the existing and established base station in situ. While the upgraded equipment will be tall and more visible from the surrounding area, it is not considered to have an unacceptable impact on the character or visual amenity of the building and the surrounding areas. Although there will be some harm, it is considered to be less than substantial when balanced against other material planning considerations and the public benefits improved connectivity will bring to the area.

The proposed antennas and their positions on the building offer a technically preferred solution, in which where possible the antennas will be tilted and orientated so as to provide cell specific coverage to the demands of the target area. When taking into account that this is an established telecommunication site accommodating a number of operators, then it is felt that the extent of development has been kept to a minimum so far as technically practicable. Considering the existing telecommunications installation on the roof, it is considered that the upgrade proposal at a similar height to the antennas that are being removed, will have a negligible visual impact especially when viewed from the ground and in perspective. The proposed antennas will be pole mounted fixed to new steel framework. The proposed antennas will be left in their manufactured form and will take a similar appearance to those they replace. In this regard although the proposed antennas will be seen from wider vantage points, it is considered that the level of visual impact has been kept within reasonable bounds.

In light of the above it is considered that every effort has been made to limit the visual impact of the upgrade scheme. It is considered that reasonable steps have been taken to achieve this by limiting the extent of development and grouping antennas together, in which the upgrade scheme will have a neutral impact on the host building.

In conclusion, the proposed upgrade of the existing communications base station at this site will provide the latest 5G technology to people and businesses in the surrounding area and will form part of EE and Three's wider 5G network of sites. It will deliver the Government's objective to provide people and businesses with access to the latest high-quality communications services, resulting in improvements to the economy and productivity across the UK. The proposed upgrade to the existing communications site is in accordance with both Central Government Policy and Local Planning Policy and, taking into account the technical constraints of the equipment, the siting and design of the equipment clearly represents the optimum environmental solution.

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For and on behalf of MBNL for EE UK Ltd and H3G UK Ltd