

Date: 21st June 2021

Our Ref: A00071 – St John the Baptist



Chief Planning Officer
London Borough of Hillingdon,
Civic Centre,
High Street,
Uxbridge,
Middlesex
UB8 1UW.

Email: Planning@hillingsdon.gov.uk

Submitted via Planning Portal

Dear Sir or Madam,

PRIOR APPROVAL APPLICATION TO REPLACE THE EXISTING ELECTRICAL METER CABINET WITH A SFMC266 CABINET MEASURING 655 X 264 X 1215 MM AND PAINTED GREEN ON THE SOUTHERN ELEVATION OF THE CHURCH ADJACENT TO THE EXISTING EQUIPMENT CABINET AND ASSOCIATED DEVELOPMENT THERETO AT ST JOHN THE BAPTIST, ROYAL LANE, HILLINGDON, MIDDLESEX UB8 3QR. (NGR 506918/182911).

We are planning consultants retained by NET to submit planning applications on behalf of Telefónica O2 UK Limited and Vodafone Limited who entered into a network sharing agreement. These arrangements will be overseen by Cornerstone Telecommunications Infrastructure Ltd (Cornerstone) which is a joint venture company owned by Telefónica UK Limited and Vodafone Limited.

This agreement allows both organisations to:

- pool their basic network infrastructure, while running two, independent, nationwide networks
- maximise opportunities to consolidate the number of base stations
- significantly reduce the environmental impact of network development

This development is for Telefonica O2 UK limited only and consists of:

THE REPLACEMENT OF THE EXISTING ELECTRICAL METER CABINET WITH A SFMC266 CABINET MEASURING 655 X 264 X 1215 MM AND PAINTED GREEN ON THE SOUTHERN ELEVATION OF THE CHURCH ADJACENT TO THE EXISTING EQUIPMENT CABINET AND ASSOCIATED DEVELOPMENT THERETO.

Enclosed is the following:

- BACS for £462 made payable to planning portal
- drawings 42280 100A,200A,201C,300A, 301B,402C, 601B,602B issue D
- Application forms

We trust you will find the enclosed information sufficient to register and validate the application. If however you require any further information, please contact Rebecca Skerrett on 0161 956 4305 or Rebecca.skerrett@avisonyoung.com

Yours faithfully,

A handwritten signature in black ink, appearing to read "R. N. Skerrett". The signature is written in a cursive, slightly stylized font.

Avison Young
International Property Advisors

PLANNING STATEMENT

The following planning statement is enclosed in support of this proposal and demonstrates the general development principles that have been adopted in the final detailed design of this proposal.

1. HISTORY & BACKGROUND AND HERITAGE

Background

A previous GPDO application was submitted for the electrical meter cabinet and equipment cabinet in 2010 under reference 3655/APP/2010/1354 and was approved in August 2010. This application seeks to replace the existing electrical meter cabinet.

The church is Grade II* Listed and is located within a Conservation area. There are a number of listed buildings and monuments in proximity to the church.



Historic England has the following information on the church:

Heritage Category:

Listed Building

Grade:

II*

List Entry Number:

1080160

Date first listed:

08 - May - 1950

Statutory Address:

CHURCH OF ST JOHN, ROYAL LANE.

Details

804/23/386

HILLINGDON ROYAL LANE (east side) Church of St John 08-MAY-50 II* Parish Church. C13 chancel arch, (only remaining part of earlier chancel) nave and aisles C14, west tower rebuilt in 1629, the building refurbished and transepts and chancel added by Sir G.G Scott 1847-48, north east vestry of 1964 by H Norman Haines.

Cruciform church with aisles, transepts and west tower. Coursed flint with freestone dressings and tiled roofs. Tower of 1629 in four stages with battlements and octagonal wooden cupola with bell and weathervane. Mainly traceried windows.

INTERIOR: C13 chancel arch with stiffleaf capitals on short stalks. Three bay C14 nave and aisles with octagonal piers with capitals and arch mouldings. North aisle roof C15 with main timbers supported by corbels with stone busts.

Many monuments including large brass to Lord Strange 1509, monument with figures to Sir Edward Carr 1657, and splendid reclining figure to Henry Pagett Earl of Uxbridge 1743. C19 marble pulpit.

Building of England "London 3: North West" pp 334-5.

Listing NGR: TQ0691482916

We have not undertaken any consultation due to the minor nature of the proposal we have however sent a courtesy letter to the school to inform them of the proposal.

Where ever possible we try and install all the apparatus internally to reduce the visual impact on the aesthetics of the building and surrounding are, however in this particular case it was not possible, this application proposes to replace the existing electrical meter cabinet which is located behind a hedge on the southern elevation of the church.

1.1. NET

NET has forged a close relationship with the churches and has opened up a portfolio of church sites to the operators. NET oversees the whole of the design and build process right from the initial negotiations with the church to the build and the maintenance of the site.

Many of the 16,000 parish and guild churches across England are suitable for housing installations and are widely used by the telecoms operators.

Church buildings have a special significance in the communities they serve, and the mission and environment of the church and its many listed buildings have to be protected. The Church of England has a strict legal process for granting permission to change the fabric of a church building, and this applies to any telecoms installation. Without full understanding of these special needs, church installations can be time consuming and difficult for both the operators and parishes concerned.

NET has worked with the Archbishops' Council to develop a standard approach to both the practical and legal aspects of telecom installations; this has resulted in a quicker and easier process for the applicant.

1.2. Background to Cornerstone

For some years Vodafone and Telefonica (O2) have been operating a network sharing agreement – broadly similar to the Orange/T-Mobile/Three arrangement. This arrangement allowed each company to share the other party's installation.

In September 2012 approval was received from the Office of Fair Trading for the formation of a new company – Cornerstone Telecommunications Infrastructure Ltd (Cornerstone).

1.3. The proposal

The church is located on the Southern side of Royal Lane, there are a number of listed buildings and monuments which surround the site.

It is proposed to replace the existing electrical meter cabinet with an SFMC 266 cabinet on the southern elevation of the church.

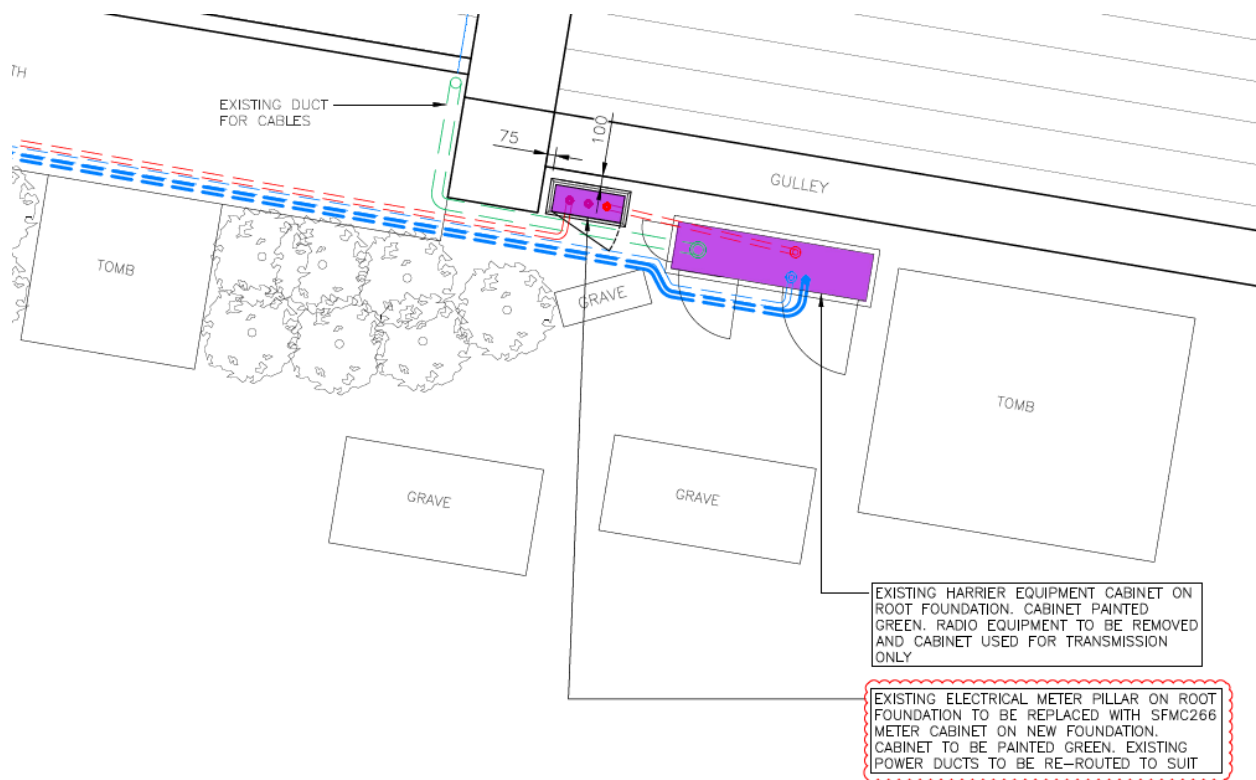
1.4 Design Considerations

The proposed electrical meter cabinet is small in size measuring 655 x 264 x 1215 mm high and replaces the existing cabinet which measures 366 x 117 x 894 mm. Although, the new cabinet is slightly larger due to its careful positioning behind the hedge which is located on the western elevation. The hedge will hide the cabinet from views in the west where the entrance is located therefore there will be limited views of the cabinet. The cabinet will be painted green to match the existing cabinet and to further lessen its visual presence.



EXISTING EXTERNAL EQUIPMENT LOCATION

Above is a photograph of the existing cabinets as can be seen the hedge effectively screens the electrical meter cabinet. Below is the setting out plan.



1.5 Planning Policy Considerations

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that Local Planning Authorities should determine proposals in accordance with development plan policies, unless material considerations indicate otherwise. Material considerations may include, inter alia, central government guidance, High Court and Inspector's decisions etc.

1.6 Local Policy

The Hillingdon Local Plan Part 1 (Strategic Policies) and Part 2 (Development Management Policies) have the following policies which are relevant in the determination of this application.

Strategic Objectives: SO1: Conserve and enhance the Borough's heritage and its setting by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and sensitive to the wider historic environment.

HE1: Historic Environment

The Policy sets out that the council will conserve and enhance conservation areas and historic buildings.

Policy DMHB1 : Heritage Assets:

The Council will expect development proposals to avoid harm to the historic environment.

Policy DMHB 2: Listed Buildings

Sets out how development should retain the significance of the listed building, and should be sympathetic in size and scale.

Policy DMHB 4: Conservation Areas

The council expects that proposals should enhance or preserve conservation areas.

Policy BE1: Built Environment

The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.

In terms of these policies the proposal is to replace an existing cabinet. The LPA in their original assessment of the application did not consider that the cabinets were contrary to policy. The visual change to the site will be negligible given the positioning of the cabinet behind a hedge and replacing a very similar cabinet. The proposal will therefore not have a detrimental impact on the listed building or the conservation area.

Policy DMHB 21: Telecommunications development

This policy states, equipment should be sited to minimise impact, should be ICNIRP compliant and existing sites and shared equipment should be utilised where possible and should not have a detrimental impact on historic assets or conservation areas.

In compliance with these policies the proposal upgrades an existing site, the cabinet is small in scale and will be well screened by the existing hedge. In addition the cabinet replaces a similar cabinet although the proposed is slightly larger. As a result the character and appearance of the conservation area will be maintained as will the historic qualities of the listed building and its setting. As the proposal is for a cabinet only an ICNIRP certificate is not required.

It is therefore considered that the proposal complies with local plan policy.

1.7 National Policy

National Planning Policy Framework

This legislation was formally adopted in July 2018 and revised in 2019 and replaces the previous version which was introduced in 2012.

In relation to this policy the following sections are relevant in determining this application:

Section 6 – Building a strong, competitive economy

Section 10 – Supporting high quality communications

Section 12 – Achieving well-designed places

Section 16 – Conserving and enhancing the historic environment

The following paragraphs need to be considered in relation to this policy:

Paragraph 80 – “significant weight should be placed on the need to support economic growth and productivity... this is particularly important where Britain can be a global leader in driving innovation.”

Paragraph 112 – “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)”

This installation will provide Hillingdon with good connectivity and will ensure that there is high quality digital infrastructure in this locality.

In relation to these paragraphs, the Government’s Industrial Strategy sets out a vision to drive productivity improvements across the UK, and sets out a delivery programme to make the UK a leader in “*artificial intelligence and big data*”. The improvement of telecommunications capacity and provision of 5G is imperative to allow for areas to be connected, and is essential for economic growth.

Paragraph 113 “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....., use of existing

masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged.”

In relation to this, the proposal is to upgrade an existing site. The proposal does utilise an existing building and utilises good design to ensure that the scheme is not visually apparent.

Paragraph 114 – “Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:

- a) They have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and
- b) They have considered the possibility of the construction of new buildings or other structure interfering with broadcast and electronic communications services.”

Paragraph 115 – “Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- a) The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and
- b) For an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or
- c) For a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

In relation to these paragraphs, the proposal complies with policy. Consultations were not undertaken due to the minor nature of the proposal and the fact that only a replacement cabinet is proposed. An ICNIRP certificate is not required for a cabinet and the proposal upgrades an existing site.

Paragraph 124 – “Good design is a key aspect of sustainable development creates better places in which to live and work and helps make development acceptable to communities.”

The proposal replaces an existing cabinet and is considered to be a good design and the cabinet is screened by the existing hedge.

London Plan 2021

The Plan recognises the strategic importance of providing necessary infrastructure, including modern communications networks that London requires to secure its long-term economic growth. The proposed works will improve digital connectivity to the benefit of Londoners and businesses. The site will ensure a high level of connectivity is sufficient to meet the rising demands of reliable data and services of the public as well as safeguarding the reduction of coverage within the surrounding area. This application is therefore an integral element in securing the Mayor’s vision for the delivery of modern communications networks across London.

With particular reference to Policy SI 6 (Digital Connectivity Infrastructure), the applicant is committed to fulfilling network obligations to cater current and future demands to ensure high quality coverage is provided which continues to be faster and stronger. In line with this policy the applicant has also demonstrated efforts to utilise existing base stations, rooftops or other structures prior to identifying

new locations to fulfil network objectives. Ongoing network upgrades are an essential aspect of London's global competitiveness which is recognised in the latest Plan.

London Infrastructure Plan 2050 – Update

Chapter 8 – Digital connectivity states that digital connectivity is vital and essential for businesses and citizens to take part in modern society. The upgrade of this site will allow for a sufficient level of connectivity to be continued within the area, thus keeping businesses and citizens at a technological advantage.

National Infrastructure Commission Report – Connected Future

The National Infrastructure Commission (NIC) was asked to advise government on the steps the UK should take in order to become a world leader in the deployment of 5G mobile telecommunications networks, and ensure that the UK can take early advantage of the applications those networks may enable.

The Commission's central finding is that mobile connectivity has become a necessity. The market has driven great advances since the advent of the mobile phone. But Government must now play an active role to ensure that basic services are available wherever we live, work and travel, whilst our roads, railways and city centres must be made 5G ready as quickly as possible.

Recommendation 4: States,

"Local Government should actively facilitate the deployment of mobile telecoms Infrastructure"

This proposal is part of the mobile network and is required to provide mobile coverage and connectivity in this busy London area.

Paragraph 3.4

"These issues need to be addressed to enable widespread provision and adoption of various future services in the UK, with high quality mobile access where people live, work and travel. Addressing coverage issues now will provide the infrastructure platform on which successive generations of mobile technology will sit, be they 5G, 6G or next generation Wi-Fi."

This site is an import part of this ethos and will provide good mobile coverage where people live work and travel.

Code of Best Practice for Mobile Network Development – June 2016

The Code of Best Practice was developed by a Working Group consisting of representatives from many organisations, including Mobile UK (on behalf of the Mobile Network Operators), the DCMS and DEFRA, and Historic England.

Of particular interest are Sections 4.3 and Section 5.

Section 4.3 relays the importance of maximising the use of existing infrastructure by upgrading it to improve capacity and coverage. This proposal upgrades an existing site to improve capacity.

Section 5 explains how Mobile Connectivity in the 21st Century is now an imperative part of everyday life. People now choose to access the Internet using their mobile device over connecting to fixed broadband networks. This Section stresses the importance of good connectivity to improve the economy, to promote social inclusion, to deliver public services such as NHS reminders by text message and to promote sustainability (by enabling home working). The proposed upgrade will

improve capacity, which will allow more people to access the network in this busy locality. This will subsequently improve the above factors and provide accessibility to more customers.

1.8 Site Need and Identification

This is an upgrade of an existing site therefore no alternative sites have been considered.

1.9 Health and Safety

The site is ICNIRP compliant but an ICNIRP certificate is not required for the electrical meter cabinet.

There are about 1400 peer-reviewed publications on the biological and health effects of radiofrequency (RF) signals, which are used in mobile communication technology. The scientific community have collated, summarised and assessed these publications in research reviews, the most influential in the UK being the Stewart Report (Mobile Phones and Health) by the Independent Expert Group on Mobile Phones under the chairmanship of Professor Sir William Stewart. These research reviews are used by Governments to develop policy on exposure to radio frequency signals.

Published in May 2000, the Stewart Report concluded that the balance of evidence did not suggest that exposures to radio frequency fields below international guidelines could cause adverse health effects, although it acknowledged that biological effects might occur below these values. The report stressed, however, that a biological effect does not necessarily mean a negative impact on health. Walking, drinking a glass of water or listening to music all produce biological effects.

Since 2000, over 30 further reviews have been carried out, carefully considering many hundreds of pieces of research. Most have made similar recommendations and have come to similar conclusions: that research should continue to address any gaps in the knowledge; and that overall, the possibility of adverse health effects from mobile communications remains unproven.

Further, the reviews stress that exposures from base stations (or masts) are, in the words of the National Radiological Protection Board (now part of Public Health England), “extremely unlikely to cause any effects on biophysical grounds.” [A Summary of Recent Reports on Mobile Phones and health (2000-2004), NRPB, Jan 2005]

In June 2011 the World Health Organisation (WHO) noted that “A large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have been established as being caused by mobile phone use” WHO factsheet 193: Electromagnetic fields and public health: mobile telephones. In April 2012 the independent Advisory Group on Non-ionising Radiation (AGNIR) published a report entitled “Health Effects from Radiofrequency Electromagnetic Fields”. This report concluded that there is no convincing evidence that mobile phone technologies cause adverse effects on human health. AGNIR also found that although a substantial amount of research has been conducted, there is no convincing evidence that RF field exposure below the internationally agreed guideline levels applied in the UK causes health effects in adults or children.

In addition, the International Commission on Non-Ionizing Radiation Protection reviewed its guidelines in 2009 and concluded “*ICNIRP reconfirms the 1998 basic restrictions in the frequency range 100 kHz–300 GHz until further notice.*” ICNIRP statement on the “Guidelines for limiting exposure to time-varying electric, magnetic and electromagnetic fields (up to 300 GHz)”.

Research reviews are used by guideline setting bodies and Governments to develop advice and public policy on exposure to the signal used by mobile communications technology.

The proposal for this site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines and therefore Health and Safety concerns

should not be a planning consideration. An ICNIRP certificate is submitted with this application confirming that the site is in compliance.

In addition to this, The Institution of Engineering and Technology's *Guide for Local Planning Authorities regarding 5G Masts and Small Cells*, provides a brief overview of 5G technology and the health issues that are often misunderstood. It concludes by saying, *"Small 5G base stations in our towns and cities will allow improved network coverage. They will reduce radio wave exposure to individual smartphone users and improve local 5G capacity for all manner of useful bandwidth-hungry applications. And a good 5G fibre base local broadband infrastructure will be important to local communities over the coming decades in view of the ever-increasing amounts of data being consumed by the general public."*

2.0. CONSULTATION

As previously mentioned due to the minor nature of the proposal no consultation has been carried out.

3.0. ACCESS

Access to the site will remain unchanged, as will the on-going traffic visiting the site. We do not envisage additional maintenance visits incurring, and being new equipment, the likelihood of requiring visits for repair is remote.

4.0 CONCLUSION

This upgrade is minimal and replaces an existing cabinet. The new cabinet is marginally increased in size but is well screened by the existing hedge and therefore the character and appearance of the conservation area will be maintained and there will not be a detrimental impact on the listed building. It is considered that the siting and design complies with national and local policy. We hope the above information is sufficient for you to consider this application favourably.