

|                                  |
|----------------------------------|
| <b>SUPPLEMENTARY INFORMATION</b> |
|----------------------------------|

## 1. Site Details

|                          |                     |                         |                                                                    |
|--------------------------|---------------------|-------------------------|--------------------------------------------------------------------|
| Site Name:               | Sipson Road         | Site Address:           | Sipson Road,<br>West Drayton,<br>Hillingdon,<br>London,<br>UB7 9JJ |
| National Grid Reference: | E: 506507 N: 179256 |                         |                                                                    |
| Site Ref:                | HGN035/70402        | Site Type: <sup>1</sup> | Macro                                                              |

## 2. Pre-Application Check List - Site Selection (for New Sites only)

|                                                                                                                                     |     |    |
|-------------------------------------------------------------------------------------------------------------------------------------|-----|----|
| 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:                                                                                                                  |     |    |
| No suitable alternatives were identified.                                                                                           |     |    |
| Were industry site databases checked for suitable sites by the operator:                                                            | Yes | No |
| If no explain why:                                                                                                                  |     |    |
| No suitable alternatives were identified.                                                                                           |     |    |

### Annual Area Wide Information to local planning authority

|                                                            |                           |
|------------------------------------------------------------|---------------------------|
| Date of information submission to local planning authority | Information not available |
| Name of Contact:                                           |                           |
| Summary of any issues raised:                              |                           |

### Pre-application consultation with local planning authority

|                                                        |            |
|--------------------------------------------------------|------------|
| Date of written offer of pre-application consultation: | 10/07/2019 |
| Was there pre-application contact:                     |            |
| Date of pre-application contact:                       |            |
| Name of contact:                                       |            |
| Summary of outcome/Main issues raised:                 |            |
| No response.                                           |            |

## Ten Commitments Consultation

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| Rating of Site under Traffic Light Model:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>AMBER</b> |
| <p>The site was rated as RED due to its proximity to residential dwellings and location within a Conservation Area. Pre-application consultation letters were sent to the following consultees on 10<sup>th</sup> July 2019.</p> <ul style="list-style-type: none"> <li>○ Councillor Ali Milani</li> <li>○ Councillor Peter Money</li> <li>○ Councillor June Nelson</li> <li>○ John McDonnell MP</li> <li>○ Sandy Kidd (Historic England)</li> <li>○ Yiewsley and West Drayton Community Centre</li> <li>○ West Drayton Young People's Centre</li> </ul> <p>Response from Sandy Kidd at Historic England – “Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.</p> <p>The proposed application site lies just outside the Colne Valle archaeological Priority Zone and given its relatively small-scale and the likely modern disturbance in this location it is unlikely to harm assets of archaeological interest.”</p> |              |

## School/College

|                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Location of site in relation to school/college ( <i>include name of school/college</i> ):                                                                                           |
| The nearest educational establishment is West Drayton Academy, Kingston Lane, West Drayton, UB7 9EA.                                                                                |
| Outline of consultation carried out with school/college ( <i>include evidence of consultation</i> ):                                                                                |
| Pre-consultation has been issued to the following recipient:<br><a href="mailto:Wdaoffice@theparkfederation.org">Wdaoffice@theparkfederation.org</a> on 10 <sup>th</sup> July 2019. |
| Summary of outcome/Main issues raised:                                                                                                                                              |
| No response received.                                                                                                                                                               |

## Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

|                                                                                                                               |            |  |
|-------------------------------------------------------------------------------------------------------------------------------|------------|--|
| Will the structure be within 3km of an aerodrome or airfield?                                                                 | <b>YES</b> |  |
| Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?                             | <b>YES</b> |  |
| Details of response:                                                                                                          |            |  |
| Heathrow Airport and the Civil Aviation Authority have been consulted on the 10 <sup>th</sup> July 2019. No further comments. |            |  |

## Developer's Notice

|                                      |                          |  |
|--------------------------------------|--------------------------|--|
| Copy of Developer's Notice enclosed? | YES                      |  |
| Date served:                         | Developers Notice served |  |

### 3.0 Proposed Development

| The proposed site:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The proposed new mast has been sited and designed in order to provide 5G coverage and to support the existing mobile network. At present it is paramount that digital connectivity is supported and maintained throughout the country. In particular the current massive shift in user demand from city centres and places of work to residential areas and suburbs requires an improvement in coverage and capacity throughout the whole network. The current proposal therefore provides such additional capacity to the network whilst still promoting the improved 5G technology.</p> <p>The proposed development is within the limits set out in Part 16 for permitted development with Prior Approval. The location enables the whole of the surrounding area to benefit from improved cover and capacity of the existing network as well as the introduction of 5G network coverage and has been designed to be future proof, thus enabling other technologies to be deployed depending upon the demand required. As the shift in demand is expected for the foreseeable future and that as central government considers digital communications to be a critical national infrastructure, we intend to support customers and local residents by ensuring as little disruption as possible. The existing site will therefore be retained so that all existing users may benefit at this difficult time. In addition, EE will become the Emergency Services Network Provider and in order to dedicate the 4G network for that use, the intention is to support all users during the current climate and to maintain all current services without the removal of any existing equipment.</p> <p>The applicant would also like to stress in today's current crises (COVID-19) it is imperative the communications is not only maintained but also enhanced to ensure capacity and real time data is at the forefront. Telecommunications is considered as a critical service as it is providing data to network operatives, field engineers, call centre staff, IT and data infrastructure, 999 and 111 critical services. This new cell will allow telecommunications infrastructure provides (EE/H3G) to assure quality, capacity and operational performance so that customers have uninterrupted access to crucial mobile and broadband services at specifically at this critical time.</p> <p>The additional cell in question will be located of Harmondsworth Road and Dell Road, to the South East of west Drayton. Heathrow Airport is sited some 2.6KM directly Southbound. The Heathrow Express lies approx. 1.1KM to the East, West Drayton Train Station lies some 913m Northbound, accommodating for the Great Western Main Line and the Staines and West Drayton Railway 1.5KM Westbound. The A408 lays some 1.1Km Eastbound. The M4 motorway is situated approx. 736KM South, with the M23 2KM West. There are numerous key transport links within the vicinity providing ease of access into Greater London and therefore occupying high levels of public traffic that would subsequently benefit from the increased connectivity/capacity.</p> |

The additional cell is to be located upon an area of grass verge in-between Harmondsworth Road & Dell Road. Located West of the additional cell location are a number of community and recreational facilities which occupy large areas of open space. Directly East of the additional cell location are an array of retail and local amenity assets, residential dwellings occupy the majority of the area further East and South, with the closest being located on Dell Road & Sipson Road.

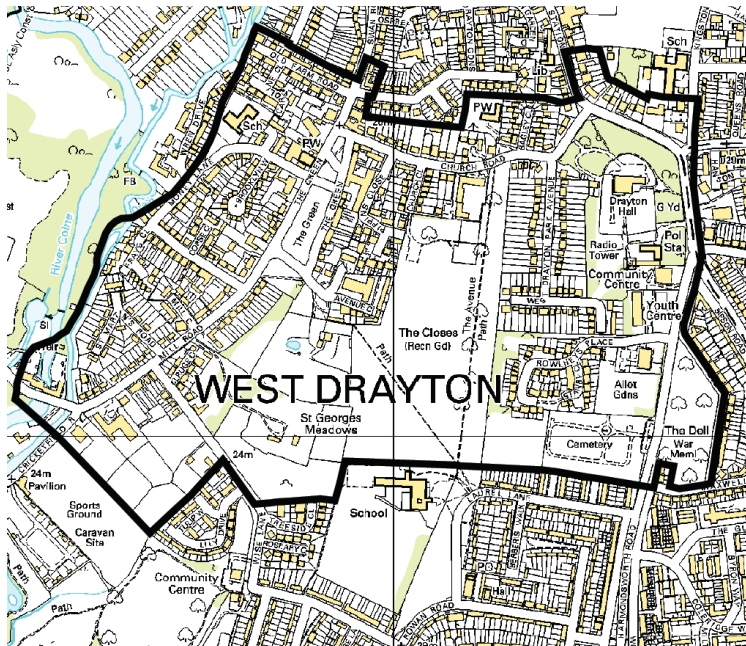
The additional cell is located in an active suburb, subject to high levels of public activity, sited adjacent to the community centres, amenities, dwellings and area of open space. The requirement for high speed connectivity within this area is paramount for both residents and visitors to the area. The immediate area houses an array of vertical elements within the existing street scene, in the form of; traffic lights, associate road signage, business signage, CCTV units, mature level trees, street lighting columns, bollards and pedestrian crossing. Many of these features have similar vertical lines to the additional cell and therefore this provides context.

The immediate area surrounding the additional cell are occupied by a mixed use assets notably the ground floor shops with the residential tenants located a top of these shops, some 20m West along Dell Road. Whilst views of the additional cell may be present from the flats upon the second storey, views will be in conjunction with existing vertical elements. Mature tree cover along Harmondsworth Road will further mitigate views, with only the pole section of the mast visible from these assets. The slim nature of the pole and linear arrangement of the cabinets are the smallest dimensions possible to be fit for purpose and adhere to ICNIRP guidelines. Whilst ensuring the development utilises effective green space in accordance with the NPPF sustainable design-led approach.

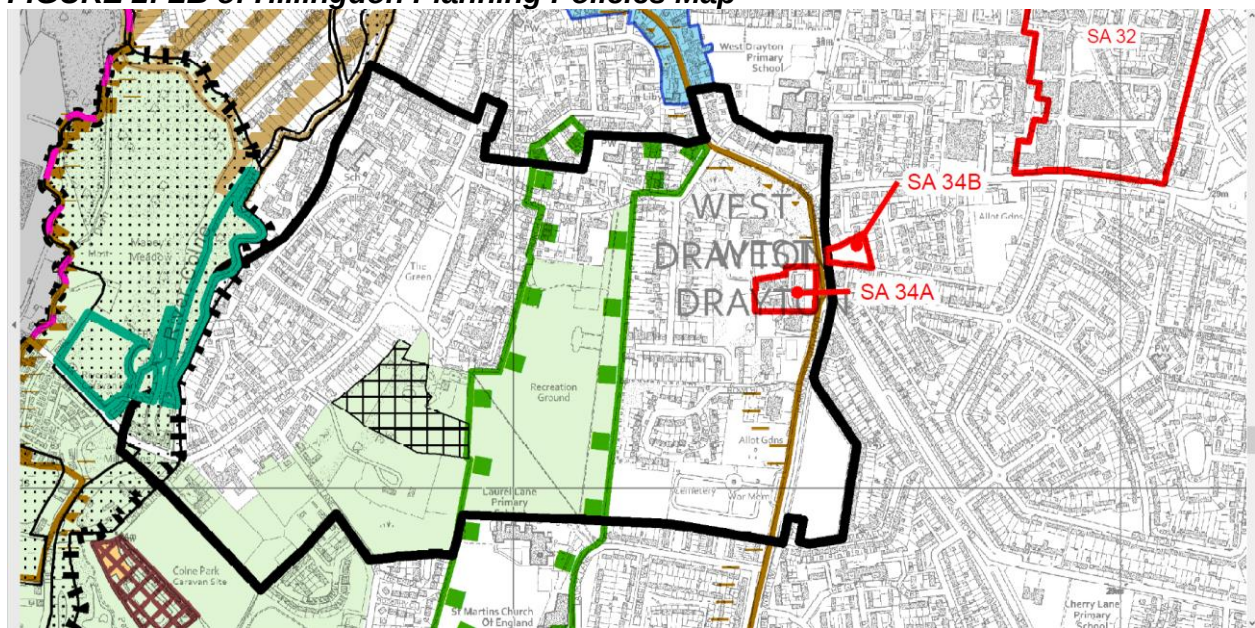
Dwellings are also present along Sipson Road, some 50M East. Although the fenestration on the façade of many of these dwellings faces due West, towards the additional cell. Full views of the additional cell are limited from the majority of these dwellings, due to the cell being situated on the grass verge with properties already blocking views. The applicant would like to note that there is recently complete housing, one the Old Police Station that lie some 50m North, front onto Station Road. Set behind tree cover, at an oblique angle , the additional cell will not be considered an eye sore, in fact the applicant would contest the additional cell would further increase the likelihood of these dwellings being occupied by tenants due to the enhanced coverage/capacity and new technologies being brought to the area.

The nearest listed building is Drayton Hall (listed Grade II, List Entry Number 1358345) which lies at approx. 80m away from the additional cell and is screened from it by intervening vegetation and buildings. The additional cell sites at the eastern edge of West Drayton Green Conservation Area. The Conservation Area was designated in 1969 and extends from St George's Meadows in the south to Church Road in the north. The eastern boundary of the Conservation Area runs along the east side of Station Road. Harmondsworth Road and Dell Road. The Conservation Area is shown at Figure 1 & 2 below. The Conservation area designation was clearly intended to protect the former historic core of West Drayton Village and Church Road. By comparison the area immediately surrounding the application appears to possess neither historic nor architectural special interest. Directly opposite the application site are the Yiewsley and West Drayton Community Centre, both modern buildings with no evident historic or architectural value and beyond that to the North is a recent residential development. The buildings to the west of the application site date to the interwar period and are not of special interest. Therefore, the applicant believes the prejudice to the area does not outweigh the public benefit/requirement for enhanced communications/coverage/capacity and should be supported.

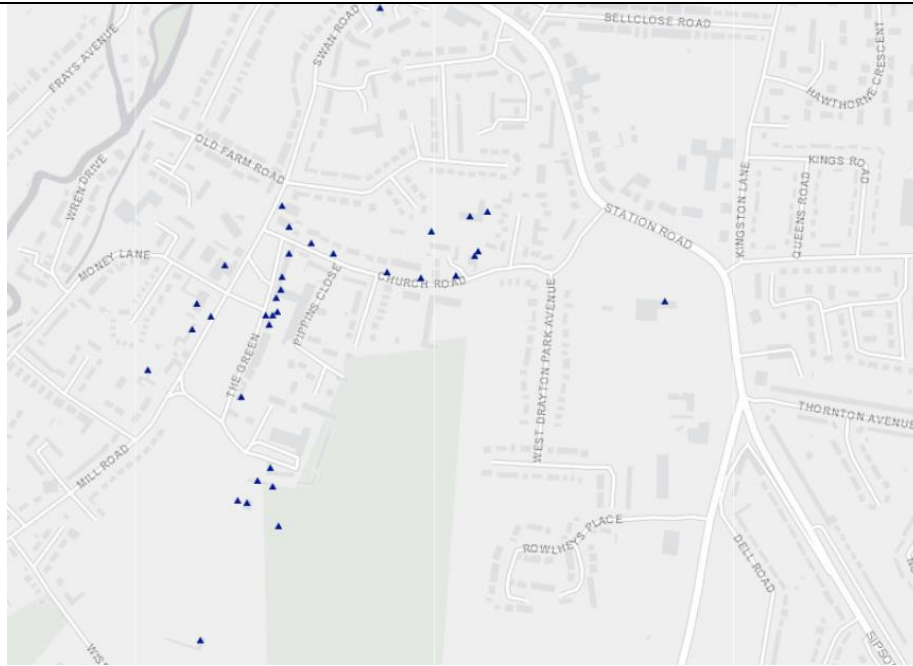
**Figure 1: West Drayton Green Conservation Area Map.**



**FIGURE 2: LB of Hillingdon Planning Policies Map**



**FIGURE 3: Distribution of listed buildings around West Drayton**



The public realm surrounding the additional cell dates to the post-war period and is of no special architectural or historic value in its own right. It is possible that some of the mature trees at the eastern verges to Harmondsworth Road once form part of the wooded landscape to the South of Drayton Hall. However, the area is now dominated by the community centre buildings, car parks and the playground such that the former historic character no longer exists.

The street scene itself is not distinguished. The application site sits near a junction and is dominated by tarmac roads and cycleways. The architectural backdrop comprises commonplace interwar semi-detached houses and an unremarkable parade of the same period. While the West Drayton Conservation Area as a whole has historic and architectural interest for the historic townscape which survives at The Green and Church Road, the area opposite the application site contributes (at best) neutrally.

Full consideration has been given to alternative sites and other existing masts in the vicinity. However, the proposed location and design are considered to provide the optimum solution in this instance, the new sites will enhance the coverage of the existing 2G/3G/4G network and also implement 5G technologies providing enhanced coverage to the public and emergency services alike. It is noted that the recent planning application was refused due to the visual impact of the monopole. However, the proposed location would have the least possible impact on the residential dwellings nearby. The Government-issued Covid-19 guidance (released 2 April 2020) stating... "Now, more than ever, the country is reliant on fixed line and mobile communications networks. Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak".

The site has to fit into an existing network, this site will allow advancements in capacity and will give the opportunity for further people to work from home and support emergency services in receiving real time data, inevitably enhancing 2G/3G/4G communications which is imperative with the current COVID-19 pandemic.

For the avoidance of doubt, the applicant would like to stress this is a brand-new site and it to be used to support the current network in implementing 5G connectivity as well as increasing

connectivity and capacity to much needed areas and therefore this application should be reviewed as a new site application. Site notices notifying the public of the proposal have been put in place during the survey stage of site identification.

During the initial site survey, site notices were erected on the existing EE/H3G pole in the nearby area to notify the public to the proposed works. It is acknowledged that the proposal would result in the introduction of a structure into the local landscape which is notably higher than surrounding structures. This effect on the appearance of the immediate area must be weighed against the significant economic and social benefits that the proposal would deliver to the wider area, inclusive of the critical communications being provided.

Three representative views have been provided to illustrate the effect of the scheme on the surrounding street scene. Commentary is provided for each to describe (in short) the choice of viewing position and the impact of the proposals on the visual amenity. The applicant would like to highlight the photos take into account visual sensitivity of the site, the quality of the townscape and the importance of the view; and the scale and nature of the additional cell.

***Photomontage 1: View taken from the edge of the Thornton Avenue/Sipson Road Junction looking South- West towards the additional cell.***



**Proposed Photo - Showing new equipment**

- The sensitivity to change is low, the townscape is architecturally undistinguished, and this street scene heavily dominated by the wide roads and the existing street furniture – bollards, railings, traffic lights and tall street lighting columns. The receptors moving through the area are likely to be focused on their journey rather than the surrounding townscape.

***Photomontage 2: View from Harmondsworth Road level with Rowle's Place and looks north towards the proposed additional cell.***



**Proposed Photo - Showing new equipment**

- *The photomontage shows the effect on pedestrians, motorists and cyclists moving north along Harmondsworth Road, an important thoroughfare leading to the West Drayton and Yiewsley. The townscape is not distinguished and receptors are likely to be focused on their journey rather than the surrounding visual amenity. Street lighting columns and existing infrastructure at the Sipson Road/Harmondsworth Road junction form tall and visually prominent elements in the view.*

***Photomontage 3: View looking South towards the additional cell along Station Road***



**Proposed Photo - Showing new equipment**

- This montage shows the effect of the proposal on pedestrians, cyclists and motorists moving along a busy thoroughfare towards Harmondsworth.
- The townscape is undistinguished and heavily dominated by the road and the existing street furniture at the Sipson Road/Harmondsworth Road Junction – railings, traffic lights and taller elements such as street lighting columns, CCTV pole and existing infrastructure.

### **Planning History**

Reference: 4634/APP/2019/2717

Installation of a 20m monopole, 12 antenna apertures, 8 equipment cabinets and 10 concrete bollards and the retention of 2 equipment cabinets following the removal of the existing 14.7m monopole, 3 antennas and redundant equipment cabinets

Decision: Rejected – 08/11/2019

**This application is for a new site and therefore a GPDO application as the existing is to be retained. The applicant would like to stress the importance of having two poles in situ to support and enhance the current network due to the current COVID-19 pandemic. These poles will provide critical communications to the public working from home and the emergency services alike.**

Reference: 56867/APP/2012/2409

Installation of new telecommunications equipment cabinet and ancillary works (Application for prior approval made under Part 24 of the Town and Country Planning (General Permitted Development Order) (as amended).

Decision: Refused – 27/11/2012

Reference: 56867/APP/2014/2732

Additional ground level equipment cabinet and replacement of existing 14.7m high mast

with new 14.7m high telecommunications mast (application under part 24 of schedule 2 to the Town and Country Planning (General Permitted Development) Order for determination as to whether prior approval is required for siting and appearance)  
**Decision: Refused – 23/09/2014**

**Reference: 56867/APP/2015/2910**

**Installation of a 15m high street works pole supporting 6 antennas, 2 ground based cabinets and development ancillary thereto.**

**Decision: Refused – 22/09/2015**

**Appeal : Allowed – 14/06/2016**

#### **Current Telecommunications Use/ The Future**

Mobile operator networks have been under increased pressure to provide up-to-date telecommunications functionality, as mobile phones and mobile broadband use have become increasingly essential to our daily lives. 5G is the next generation of technology to enable increased connectivity with increased data speeds. The growth of digital connectivity over the last decade and the expectations of users have advanced at an unprecedented level. The NPPF recognises that “Advanced high quality and reliable telecommunications infrastructure is essential to economic growth...” , as will be considered in more detail below. The current proposal will provide positive benefits to the community which will far outweigh any perceived negative impacts. MBNL have produced an advisory note entitled 5G and Future Technology- Delivering the UK’s Telecoms Future and this is enclosed as part of the application.

Enclose map showing the cell centre and adjoining cells:

**The existing coverage will be maintained and the technology will be enhanced to provide 5G. It is therefore not considered necessary to provide coverage plots in this instance.**

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

Description: - The installation of the telecommunications cell located Sipson Road, West Drayton, Hillingdon, London, UB7 9JJ.

The installation of a 20m monopole, 12 no. antenna apertures, equipment cabinets and development ancillary thereto.

Overall Height: 20m

Height of existing building (*where applicable*):

**N/A**

Equipment Housing:

Length:

As per attached drawings

Width:

Height:

Materials (*as applicable*):

Tower/mast etc – type of material and external colour:

**As per attached drawings**

Equipment housing – type of material and external colour:

**As per attached drawings**

### **Reasons for choice of design:**

The mast has been specifically designed for the site in question, considering the existing street scene along Harmondsworth Road & Dell Road. Whilst the additional mast is taller than that which already exists nearby, it needs to be in order to introduce the required technologies to the area. It is necessary for the height of the structure to ensure that interference is avoided, the topography of the landscape does not have an unacceptable impact upon mobile signal quality and that the structure is able to support the 5G antenna and other apparatus. It also needs to be tall enough to satisfy ICNIRP standards and would not provide the levels of coverage and capacity of the existing and emerging networks/technologies.

The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements needed by the operator. It is necessary for the height of the structure to ensure that interference is avoided, the topography of the landscape does not have an unacceptable impact upon mobile signal quality and that the structure is able to support the 5G antenna and other apparatus. It also needs to be tall enough to satisfy ICNIRP standards, relative to the surrounding land uses.

The mast will be seen to be blended into the existing context of the street scene. Lighting columns, tree cover, business signage, traffic lights, bollards and other existing vertical elements. The apparatus has been specifically designed and sited, to allow for continued free flow pedestrian passage, upon the pavement. The additional cell has been located as not to impede upon motorist's visibility splays when travelling along Harmondsworth Road and using nearby junctions, avoiding conflict with nearby mature trees.

The cabinets are all located close to each other in a linear arrangement situated on the grass verge; as a result, it is not considered that they add unreasonable 'clutter' to the street scene. The bollards are positioned with the intention of providing protection to an engineer while maintaining cabinets. Although desirable they are not, however, essential and should the case officer consider that these have adverse effects then the applicants would be willing to remove these from the proposed scheme.

The location and appearance of the proposed cabinets is shown in drawings 215 and 265. These cabinets are all required for the accommodation of the new equipment to provide the 5G services. In total the new base station will require new cabinets to provide 2G, 3G, 4G and 5G technologies for both operators. The proposed cabinets are similar in size to those within the area (there is some variation but these are typically 1.5 m high x 1.1m long and 0.5-0.8m deep). The scale of the proposed cabinets is, therefore, relatively modest given the location and size, the additional cell and associated equipment should not be regarded as adversely affecting the character and appearance of the area. The development will not be out of character with the existing street scene more generally.

It is accepted that the proposed monopole would extend slightly higher than the top of the crowns of the mature trees located in this part of Harmondsworth Road & Dell Road. However, the structure is slim and designed in a way that fits in within the surrounding street furniture. The limited visual impact of the proposed monopole will be screened by the already high rise industrial units. The proposed monopole would not have any significant adverse impact on the appearance or character of the location or the street scene. The monopole is slim in form and would be seen in the context of the current character of the locality with existing vertical elements (including street lighting columns, mature trees, street signage, business signage, traffic lights, bollards and pedestrian crossings). All of which would provide context and screening to a large section of the monopole and further mitigating visual impacts.

Network Planners have indicated that the position of the additional cell is the ideal location to provide optimum coverage to both enhance the capacity of the current network and also bring advanced technologies to the area. It should be noted that the new technologies and increase to the existing network will provide high-quality and high-speed critical communication infrastructure, this is essential for economic growth and to improve a critical service as illustrated in the NPPF and Government COVID-19 aim.

The requirement for the additional monopole is to support the existing network and has been designed in order to provide network coverage and capacity where demand is located. During normal times network capacity is within city centres and places of work. As the country faces this crisis, demand has shifted to different locations and there is far greater demand and thus requirement for increased capacity. It is highly likely the population will work in this manner well beyond when any restrictions are lifted. Consequently, the capacity now and in the future requires a second pole rather than a replacement.

#### 4.0 Technical Information

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                           |     |    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----|----|
| International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                           | Yes | No |
| International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.                                                                                                                                                                                                                                                                                  |                           |     |    |
| 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.                                                                                                                                                                                                                                                                                                                                                            |                           |     |    |
| Frequency                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | To be provided on request |     |    |
| Modulation characteristics <sup>2</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | To be provided on request |     |    |

<sup>2</sup> 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.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| <p>Power output (expressed in EIRP in dBW per carrier)</p> <p>In order to minimise interference within its own network and with other radio networks, EE operates its network in such a way that radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.</p> <p>As part of EE's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> | To be provided on request |
| Height of antenna (m above ground level)                                                                                                                                                                                                                                                                                                                                                                                                                  | 20m                       |

## 5.0 Technical Justification

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

The proposed development represents a solution to enhance the existing site. The existing coverage will be maintained and the technology will be enhanced to provide 5G. It is therefore not considered necessary to provide coverage plots in this instance.

### Proposed HS2 Pole Design:

1. In order to maintain coverage (which is height dependent) for all frequency bands and technologies the lowest antenna height in the HS2 design must be the same as, or greater than, the antenna height of the existing Street works pole.

2. Reducing the antenna height would potentially remove coverage for existing mobile phone users.

3. The HS2 design contains 12x Individual sector antennas positioned at 4 levels (3x 120deg sector antennas per level)

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4. The antennas in the lower two levels provide 2G/3G/4G coverage in the 800MHz, 1400MHz, 1800MHz, 2100MHz and 2600MHz Bands. These antennas provide a mixture of voice, data and text to mobile phone users.

5. The antennas in the upper two levels provide 5G coverage in the 3500MHz band. These antennae provide 5G high speed / low latency packet data (for applications such as HD Video, Home Broadband and Machine to Machine Communications)

6. The 3500MHz band has the poorest radio propagation characteristics of all the presently available bands – this issue is somewhat mitigated by positioning them at the top of the antenna array.

7. Some vertical separation (0.5m) is required between antennas to prevent adjacent antennas interfering with each other.

8. Many elements of antenna sharing between EE and 3UK are removed in the HS2 design. This means that the site can be better tuned for EE and 3UK's individual coverage and capacity requirements.

**Background:**

As part of EE Ltd's and H3G Ltd's continued network improvement program they wish to enhance the existing site to facilitate additional coverage and capacity requirements, incorporating new technologies. Section 10 of the NPPF sets out the Government's general overview regarding supporting high quality communications infrastructure, recognising that advanced, high quality communications infrastructure is essential for sustainable economic growth.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive; calls, texts, emails, pictures, web, TV and downloads. Without base stations, mobiles devices and phones will not work.

Many other everyday items also use radio signals to send and receive information, such as television and radio broadcasting equipment and two-way radio communications. Base stations are connected to each other and telephone exchange buildings by cables or wireless technology such as microwave dishes, to create the network. The area each base station covers is called a "cell". Each cell overlaps with its neighbouring cells to create a continuous network. The size and shape of each cell is determined by the features of the surrounding area, such as buildings, trees and hills which can block signals. When people travel between cells, the signal is transferred between base stations without a break in service. Each base station covers a certain area only and can only handle a limited number of calls at once. As mobile phones and devices become more popular, more base stations are needed to ensure continuous coverage.

It is imperative that support is given to the introduction of new infrastructure to allow new technology which will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds. This will enable places to remain competitive and will support the Government's ambition for the UK to become a world leader in telecommunications technologies and development. Whilst it is acknowledged that there is a significant increase in the scale of telecommunications development on the site, it should be noted that the new technologies will provide advanced high-quality communications infrastructure essential for economic growth as sought by the NPPF.

All EE installations are designed to be fully compliant with the public exposure guidelines established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines have the support of UK Government, the European Union and they also have the formal backing of the World Health Organisation. A certificate of ICNIRP compliance will be included within the planning submission.

| Site <sup>3</sup>                   | Site Name and address                                           | National Grid Reference | Reason for not choosing <sup>4</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------|-----------------------------------------------------------------|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Location on Existing Tall Buildings |                                                                 |                         | There are no tall buildings within the area capable of addressing the network requirement of this location. To address this requirement buildings would need to be generally in excess of 15m in height and there are none in the locality. Even if there were sufficiently high buildings then these would require roofs that are structurally capable of accommodating the required equipment, which would be in the form of a stub tower or roof pods. Such structures are likely to be more visually intrusive than a slim monopole as is proposed at the proposed new site. |
| Existing Mast                       | Sipson Road, West Drayton, Hillingdon, London, UB7 9JJ.         | E: 506508 N: 179260     | The existing mast currently in place is not capable of accommodating for the 5G equipment, in its current form. Additionally, due to the lack of room caused by the underground utilities, the new mast and its associated equipment cabinets would not be able to fit in the exact location. Furthermore, the additional cell is to support the current network capacity/coverage whilst providing enhanced 5G connectivity.                                                                                                                                                    |
| Greenfield alternative              | Station Road Centre, Station Road, Barkingside, Ilford, IG6 1NB | E: 545164 N: 189449     | A greenfield option within this area would cause further harm to the character of the area and local land designation areas. This is due to the fact a GF tower would have to be around 25-30M and be 1/3 wider than                                                                                                                                                                                                                                                                                                                                                             |

<sup>3</sup> ETS - Existing Telecomm site, ES - Existing Structure, RT - Roof Top, GF - Greenfield

<sup>4</sup> SP - Site Provider, RD - Redevelopment Not Possible, T - Technical Difficulties, P – Planning  
 O – Other

|                              |                                                                |                     |                                                                                                                                                                                                                                                                                                                                                                     |
|------------------------------|----------------------------------------------------------------|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                |                     | the proposed additional cell to provide similar coverage to the area. Therefore, this has been discounted as an option.                                                                                                                                                                                                                                             |
| Sharing other operator masts | Existing CTIL mast, West Drayton, Hillingdon, London, UB7 9JJ. | E: 506513 N: 179278 | The operators are unable to co-locate with the existing mast in this location, this is due to interference from the existing mast and the proposed solution, in addition the mast is not suitable to accommodate the extra antenna needed to facilitate the level of capacity and coverage for 5G connectivity in the area and therefore this is deemed unsuitable. |



## **Additional relevant information**

### **Planning Policy Assessment**

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with policies of the adopted Statutory Development Plan, unless material considerations indicate otherwise.

### **National Planning Policy Framework (2018)**

The National Planning Policy Framework (NPPF) was published in July 2018 and supersedes previous versions of the document and national planning guidance contained in the various Planning Policy Guidance notes and planning Policy Statements. The NPPF sets out the Government's economic, environmental and social planning policies and how these are to be applied in relation to all planning applications.

Under Section 6 paragraph 80 the NPPF advises....” *Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.*” In terms of supporting a prosperous rural economy paragraph 84...” *The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.*” This approach provides a sustainable solution to the need to enhance telecommunications services in the area which will benefit not only the local community, but also visitors to the area and potentially reducing the need to travel.

In section 10 of the new NPPF, the document seeks to support “*Advanced, high quality and reliable communications infrastructure*” ensuring that it is “*essential to economic growth and social wellbeing*”. It advises that “*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.*” Paragraph 113 states” *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.*” The applicant would like to highlight that if the LPA deemed necessary the applicant can paint the colour of all the equipment to further camouflage it into its surroundings. Furthermore, this application follows a design-led approach in re-using an existing land area already housing telecommunications infrastructure.

Paragraph 114 continues” *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 structures interfering with broadcast and electronic communications services.

### **National Planning Policy Framework (2019)**

*The NPPF 2019 places a high importance on the need to upgrade England's digital communication network and the promotion of economic growth. Key policy references are identified in the planning application Supplementary Information:*

- *Para 112 emphasises that “high quality and reliable communications infrastructure is essential for economic growth and social well-being” and that “planning policies and decisions should support the expansion of electronic communications networks”.*
- *Para 113 advises that the re-use of existing masts and buildings should be encouraged and equipment should be well designed/camouflaged where possible.*

The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for EE Ltd and H3G (UK) Ltd to enhance telecommunications services in the area to the benefit of the local community and visitors to the area. It will make effective use of the land as set out under Section 11 of the NPPF.

The current proposal is for an important investment in upgrading the communications infrastructure in this area of Hillingdon. Full consideration has been given to alternatives, including existing masts and the proposal is considered to provide the best option in terms of meeting the technical requirements in a location with limited local impacts.

Improving the communications infrastructure is critical to supporting sustainable economic growth. Para 80 of the NPPF notes that significant weight should be placed on the need to support economic growth and productivity. Para 82 states that planning decisions “*should address and recognise the locational requirements of different sectors*” which will include the needs of the locational requirements of digital communications infrastructure.

The proposal supports better communication services for local residents and visitors to and through the area, it supports economic growth, choice and is part of the new technology the Government wishes to encourage and support. Importantly, it also reduces the need to travel, particularly at peak-periods, and allows working from home to take place. It therefore constitutes sustainable development.

Furthermore, with the new government guidance during COVID-19 pandemic in supporting telecommunications as critical service, the applicant would like to highlight this in relation to this new installation in its importance to support the existing network infrastructure.

With regard to the relevant heritage policies within the NPPF it may be seen that the harm to the designated heritage asset (West Drayton Conservation Area) is natural since the streetscape surrounding the application site does not contribute positively to

the special architectural or historic interest of the Conservation Area. In any case, any harm would be clearly and convincingly outweighed by the public benefit of the scheme the introduction of 5G to the area will benefit local businesses and residents, and ultimately benefit the vibrancy of the Conservation Area.

The proposal is not designed to respond specifically to the local character (as required by the NPPF Para 127) however, it would not be feasible for the applicant to achieve the Government's objectives while offering a bespoke design for each location nationally.

To conclude, the additional cell is strongly supported by the NPPF which identifies that weight should be attached to investment into telecommunications infrastructure of this kind. The technological benefit of the new infrastructure decisively outweighs the very limited harm to the Conservation Area and non-designated heritage assets. The proposal fully satisfies the NPPF's requirements to consider alternative locations for communications infrastructure including existing masts.

### **Local Planning Policy**

The statutory development plan for the area is comprised of The London Plan, Adopted March 2016 and LB Hillingdon Local Plan part 1 & part 2.

### **The London Plan, March 2016**

#### ***"Policy 4.10 New & Emerging Economic Sectors***

Policy 4.10 of the London Plan identifies measures that should be undertaken to promote new and emerging economic sectors including the evolution of London's science, technology, media and telecommunications sectors. Critical to the promotion of these sectors, and other research and development, is the provision of the highest quality digital communications network. The current proposal invests in this network to serve this part of the LB Hillingdon.

#### ***"POLICY 4.11 ENCOURAGING A CONNECTED ECONOMY Strategic***

*A. The Mayor and the GLA Group will, and all other strategic agencies should:*

- a) facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive connectivity meeting the needs of small and larger enterprises and individuals.*
- b) Support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits."*

Policy 4.11 states that all strategic agencies should *facilitate the provision and delivery of ICT infrastructure (Policy 4.11 A a) and to support the use of information and*



communications technology to enable easy and rapid access to information and services (Policy 4.11 A b). It has been demonstrated that the new proposal is well-designed and supports this policy.

## **Living Spaces and Places**

### **“Policy 7.4 Local Character**

#### *Strategic*

- a) *In their neighbourhoods, people should have a good quality environment in an active and supportive local community based on the lifetime neighbourhoods principles set out in paragraph 7.4A.*

#### *Planning decisions*

- b) *Development should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people’s access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment and training opportunities, commercial services and public transport.*
- c) *Development should enable people to live healthy, active lives; should maximize the opportunity for community diversity, inclusion and cohesion; and should contribute to people’s sense of place, safety and security. Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people’s lives, and should meet the principles of lifetime neighbourhoods.*
- d) *The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood.*
- e) *The policies in this chapter provide the context within which the targets set out in other chapters of this Plan should be met.*

#### *LDF preparation*

- f) *Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.*
- g) *Boroughs should work with and support their local communities to set goals or priorities for their neighbourhoods and strategies for achieving them through neighbourhood planning mechanisms.*

The applicant would like to highlight the slim design and linear arrangement of the cabinets have been created using the most up to date designs, furthermore the applicant would like to stress that if the LPA deemed necessary the equipment can be painted any colour to camouflage into its surroundings. Furthermore, the additional cell is in a location which is surrounded by vertical elements comprising numerous lighting columns and existing infrastructure adjacent to the application site.



Telecommunications infrastructure has been long established within this area and therefore it is argued this design is supported by Policy 7.1 part (b) & (c).

#### **“Policy 7.8 – Heritage Assets and Archaeology**

This policy requires that development should identify and value heritage assets where appropriate. Proposals should conserve significance by being sympathetic to form, scale and architecture detail. As noted above, the proposals would not materially harm the significance of the designated heritage asset.

The additional cell will not significantly conflict with relevant policies within the London Plan. It is acknowledged the development does not provide a locally bespoke design response, however the additional cell is of the minimum height and as slender as it can be within the required operation specification. The harm to the street scene would be slight and more than justified by the considerable benefit of enhancing the coverage/capacity of the existing network and bring new 5G connectivity to the area.

#### **“POLICY 7.5 PUBLIC REALM & Emerging London Plan**

##### **“Policy D8 – Public Realm**

###### *Strategic*

*A London’s public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.*

###### *Planning decisions*

*B Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space. Opportunities for the integration of high-quality public art should be considered, and opportunities for greening (such as through planting of trees and other soft landscaping wherever possible) should be maximised. Treatment of the public realm should be informed by the heritage values of the place, where appropriate.*

*C Development should incorporate local social infrastructure such as public toilets, drinking water fountains and seating, where appropriate. Development should also reinforce the connection between public spaces and existing local features such as the Blue-Ribbon Network and parks and others that may be of heritage significance.”*

This policy identifies that the public realm should be accessible, connected and incorporates the highest quality design (among other factors). The limited visual impact of the proposed cell is illustrated within the drawings; the slim design and linear arrangement of cabinets are similar to that already within the vicinity.

The height for the new cell is the minimum capable of providing the technological improvements sought. It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds than is possible using the existing technology, this is important in the current crises as it will support critical communication coverage. This will enable places to remain competitive and will support the Government's ambition for the UK to become a world leader in 5G; furthermore this will support the Government's latest guidance regarding critical communications and COVID-19. The proposed mast needs to be taller than the existing masts within the vicinity to introduce the required new technologies to the area and satisfy ICNIRP requirements. It will therefore rise slightly above the height of the nearby trees and street furniture. However, due to the existing vertical elements within the street scene, the applicant contests that the prejudice to the area does not outweigh the public benefit/requirement for advanced communications and the demand is ever growing year on year.

### ***“ Policy 7.6 Architecture***

This policy identifies that architecture should make a positive contribution to the streetscape with design appropriate to its context (Policy 7.6A). Part B notes that structures should be of a proportion, composition, scale and orientation (Policy 7.6Bb) that enhances/activates/defines the public realm and not cause unacceptable harm to the amenity of surrounding land and buildings (Policy 7.6Bd). The form of the mast and its associated equipment is dictated by the function which it performs, introducing 5G technologies to the area. It is the minimum height and girth capable of introducing the required technologies, whilst also satisfying ICNIRP standards. The proposal has been specifically designed using the most up to date materials and design-led approach to ensure that the scheme is future proofed. The applicant has demonstrated that, in the context of the need to meet the technical requirements which would allow an enhancement to the existing ICT infrastructure, the proposal fully meets the requirements of this policy.

### ***Emerging London Plan***

*The intent to Publish version of the London Plan was submitted to the Secretary of State in December 2019. It carries significant weight as a material consideration in the determination of planning applications.*

### ***“Policy D1 – London’s form, character and capacity for growth***

This policy is wide ranging and provides a broad context in relation to the growth and regeneration potential. The applicant would like to highlight that the proposed cell will bring growth to the economy in allowing people to work from home and bringing further business to area. In reference of regeneration, the most up to date design have been used in future proofing the site. The policy also sets out wide ranging requirements for new developments included in criteria B which further indicates that this proposal would be beneficial to this policy. The new telecommunications cell will encourage growth in terms of allowing further people to work from home and also bringing new visitors to the area, it will also support employment opportunities and housing choice as the area will benefit from improved technologies as well as enhancement in capacity and coverage.

***“Policy D3 – Optimising site capacity through the design-led approach***

This policy sets out guidelines to ensure the most effective use of land and space are utilised. In accordance to criteria B, this development has been designed on a site specific bases ensuring that it has the least impact to the character of the area and also ensuring that the most up to date design have been used. The slim nature of the pole and linear arrangement of the cabinets highlights this. The applicant understand that the additional cell will be located within the conservation area, however as stated prior the benefits of the scheme fully outweigh the perceived impacts, the small scale design ensures that the optimum level of land is used to fit the purpose of the development.

***“Policy D4 – Delivering a good design***

This policy sets out guidelines into three sub-sections, the applicant would like to point out the most up to date designs have been chosen for this proposed cell. It has been designed in a site specific way to ensure it aligns with the street furniture and character of the area, this case the area is heavily occupied by industrial units and therefore an industrial like design is the most appropriate for the area. The applicant would also like to highlight that the design of the monopole is of a slim nature, albeit tall in height this requirement is to ensure it complies with ICNIRP guidelines. The linear arrangement of the cabinets means that the proposed development is not viewed as a ‘cluttered’ design. Furthermore, the monopole mast is of a similar nature of that currently in the area and therefore it is contested that no further harm will be done to the character and appearance of the area. The development proposal is built to future proof the site and not only bring high-speed communications to the area but also bring a futuristic design.

***“ Policy GG1 Building Strong and inclusive Communities***

This policy is wide ranging and provides a broad context for more detailed policies in the Plan. It sets out wide ranging requirements for new development included in which is criterion D which requires that development seeks to ensure that London generates a wide range of economic and other opportunities which benefit everyone to make London a fairer, more inclusive and more equal city. Improving the telecommunications network has a key role to play in meeting this challenge in that it will support fair access for all too new economic, social, community and other facilities. Linked to this are criteria H and I which promote the aim of ensuring that all members of the City’s community can enjoy the opportunities that the city provides and share in its prosperity and culture by minimising barriers and inequalities. Again, improving the mobile telecommunications network will support the aims of these criteria.

***“Policy E8 Sector Growth Opportunities and Clusters***

This policy promotes support for employment opportunities to be provided across a diverse range of sectors and that London’s leadership in “tech” should be maximised. Although the focus of the policy is on the provision of space and locations for development it is clear that improving the mobile communications network, including the provision of 5G, is an important requirement to support the objectives and achievement of this Policy.

***“Policy S16 Digital Connectivity Infrastructure***

*Part B of this policy states that “Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in*



connectivity and barriers to digital access". Furthermore, the supporting text for the policy states:

*"The provision of digital infrastructure is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance. London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. Fast, reliable digital connectivity is essential in today's economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration."*

It is clear this that upgrading digital networks to 5G is a critical component of addressing the city's needs for improving digital connectivity. The current application is a key element of this to serve this part of Hillingdon.

### **Hillingdon Strategic Infrastructure Plan (May 2017)**

#### **"4.2.6 Telecoms and Broadband"**

*Context Vodafone partner with O2, Three partner with EE under a company called MBNL and each partnership ensures sufficient mobile network coverage and capacity through the provision of the necessary infrastructure (antennas and masts on sites). BT Openreach provides the necessary infrastructure for broadband provider fixed roll-out.*

*The Housing White Paper Fixing Our Broken Housing Market (February 2017) set out that to achieve full fibre connectivity it is consulting on requiring local authorities to have planning policies setting out how high-quality digital infrastructure will be delivered in their area.*

*At the 2016 Autumn Statement, the Government announced over £1 billion of new funding to boost the UK's digital infrastructure. This includes £400m of funding for a new Digital Infrastructure Investment Fund to support access to commercial finance for providers to invest in new fibre networks, and £740m to support the market to roll out full fibre networks and to deliver a programme of 5G and integrated fibre trials in local areas. In assessing bids for these trials from local authorities, the DCLG will take account of which areas can demonstrate that they have policies setting out how high-quality digital infrastructure will be delivered in their area. Furthermore, the Local Government Finance Bill published on 13 January 2017 will give a business rates tax break worth £60 million to incentivise telecommunications companies to lay new full fibre broadband."*

Securing a 5G development will improve the social and environmental conditions in the area and will provide significant benefits to the community in general. The current application forms part of a multi-million-pound trial of new high-speed connectivity, paving the way for the future rollout of 5G across the UK. The installation has been designed to the highest possible standard, utilising the latest equipment available. The use of a single site for two operators will in any event remove the need for additional base stations in the area.

The proposal incorporates the latest technologies and design techniques to ensure that the proposed monopole will be as easily assimilated into the existing environment. It is determined that the benefits of granting planning permission would significantly

outweigh any potential perceived negative impacts and accordingly it is contended that permission should be granted in line with the above statement.

### **Hillingdon Local Plan – Parts 1 and 2**

### **Local Plan Strategic Policies (Adopted 2012)**

#### ***“Policy BE1: Built Environment***

This policy requires that new development achieves high quality design which enhances local distinctiveness. Development should be of an appropriate form, scale and material and improve the quality of the public realm to provide for attractive public spaces.

The additional cell and associated cabinets are of the minimum necessary number, scale and height to meet the identified operational requirements. It would not be reasonable or financially viable to deliver a bespoke design solution for the proposed equipment, however the monopole is designed as a ‘light-weight’ structure to minimise its visual impact as far as possible. In this instance the application site is already surrounded by tall structures such as street lighting columns and telegraph poles such that the impact on the public realm would be, at worst, very minor adverse. This can be further identified by the photomontages attached with the application, these montages further illustrate that the proposal fully respects the context of the local area and the visual impact is minimal.

#### ***“Part 1: Vision for Hillingdon***

The vision for Hillingdon identifies a range of aims that would be achieved over the life of the Local Plan, including:

- *Improved environment and infrastructure is supporting healthier living and helping the borough to mitigate and adapt to climate change*
- *Improved accessibility to local jobs, housing and facilities is improving the quality of life for residents*

The proposed cell would significantly enhance mobile digital communications in this part of Hillingdon. This will improve access to information, services, and facilities and improve potential access to employment and recreation for the whole community.

#### ***“HE1 : Heritage, DMHB1: Heritage Assets & DMHB 4: Conservation areas***

HE1 states that the council will conserve and enhance Hillingdon’s distinct and varied environment including designated heritage assets and locally recognised features such as Area of Special Local Character. DMHB1 states that the development proposals will be expected to avoid harm to heritage assets unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss. DMHB4 states that new development within or on the fringes of Conservation Areas will be expected to preserve or enhance the character or appearance of the area. New proposals should be of a high quality, contextual design.

It is likely that the Conservation Area boundary was drawing – for simplicity – to connect the Dell (a public amenity space) and Drayton Hall and its grounds, rather in recognition of special character immediately to the west of the application site. In addition to this, the streetscape is already characterised by ‘clutter’. There are tall streetlamps, telegraph poles, existing infrastructure and traffic lights at the junction

between Sipson Road and Harmondsworth Road.

The street scene itself is not distinguished. The application site sits near a junction and is dominated by tarmac roads and cycleway. The architectural backdrop comprises commonplace interwar semi-detached houses and an unremarkable parade of the same period.

In summer, while the West Drayton Conservation Area as a whole has historic and architectural interest for the historic townscape which survives at The Green and Church Road, the area opposite the application site contributes (at best) neutrally. Drayton hall is of a special historic architectural interest as an early C 19<sup>th</sup> neo-classical country house. Historic Ordnance Survey maps suggest that the land opposite the application site once formed part of the private grounds to the house; however the landscape is heavily altered to the extent that any surviving value or contribution to the setting of the listed building is purely evidential.

Notwithstanding this, the character and appearance of the land immediately surrounding the applications it is very clearly modern and does not warrant special consideration or preservation intended through the planning (Listed building and Conservation Areas) Act.

#### **“Policy CI1: Community Infrastructure Provision**

*The Council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations by:*

- 1. Resisting of the loss of community facilities, and where the loss of these facilities is justified it will seek to ensure that resulting development compensates these uses to ensure no net loss;*
- 2. Supporting the retention and enhancement of existing community facilities;*
- 3. Supporting extensions to existing schools and the development of new schools and youth facilities;*
- 4. Encouraging the development of multi-purpose facilities that can provide a range of services and facilities to the community at one accessible location;*
- 5. Promoting innovation in service provision and recognising that there are a range of modes appropriate for providing for all sections of the community;*
- 6. Requiring development to contribute towards the provision of community facilities to meet the needs of new communities and mitigate impacts on existing communities;*
- 7. Locating libraries, health facilities, police facilities, leisure facilities and community centres in town centres or other accessible locations to maximise community access, sustainable transport and build a sense of local community identity;*
- 8. Ensuring new facilities demonstrate how they will tackle climate change, in line with Policy EM1;*
- 9. Providing facilities and services that are accessible and inclusive to all potential users regardless of age, ability, gender or socio-economic status; and*
- 10. Implementing a borough-wide Community Infrastructure Levy (CIL) to fund community infrastructure provision.”*

The proposed installation will bring 5G to the area, supporting modern infrastructure and providing the best network connectivity possible across Hillingdon. The 5G network is to be the fastest service operators are able to provide, the new technology will enable easy and rapid access to information. The installation is located within an area, popular with residential dwellings and shops, the services provided by the mast will benefit both the local community and businesses within the immediate area. Whilst there will be

some visual impact it is contended that the character and appearance of the area will not be unacceptably harmed and the overall benefits of the proposal will outweigh any perceived harm.

### **“Policy BE37**

*Telecommunications developments will be acceptable in principle provided that any apparatus is sited and designed so as to minimise its effect on the appearance of the surrounding areas. The local planning authority will only grant permission for large or prominent structures if:*

- (i) There is a need for the development in that location;*
- (ii) No satisfactory alternative means of telecommunications is available;*
- (iii) There is no reasonable possibility of sharing existing facilities;*
- (iv) In the case of radio masts there is no reasonable possibility of erecting antennae on an existing building or other structure; and*
- (v) The appearance of the townscape or landscape is not seriously harmed.”*

Network planners have identified the need for an additional cell to enhance the capacity and coverage of the current network and to introduce new technologies to the area. It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds than is possible using the existing technology. This will enable places to remain competitive in and will support the Government’s ambition for the UK to become a world leader in 5G. Furthermore, support is needed to ensure critical communications aren’t disturbed specifically during this unprecedented time (COVID-19 pandemic) as the public and emergency services alike are heavily reliant on these communications.

The additional mast is the minimum height and girth capable of introducing the desired new technologies which will benefit the area more generally. It has been designed and sited to minimise its impact as far as possible and it is believed that the proposed installation will not have an undue impact upon the amenity of the area. Whilst there will be some visual impact it is not considered that the impact will be so great as to warrant the refusal of planning permission. Furthermore, no suitable alternatives exist. The mast has been specifically designed for the site in question, taking into account site specific characteristics as highlighted above.

The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for EE Ltd and H3G (UK) Ltd. In all these circumstances it is contended that the proposed development complies with the aims and objectives of Policy IN2 and accordingly planning permission should be granted.

### **“Policy BE13**

*Development will not be permitted if the layout and appearance fail to harmonise with the existing street scene or other features of the area which the local planning authority considers it desirable to retain or enhance.”*

Whilst there will be an increase in the height of the installation, it is contended that the proposed mast, the additional cell will support and enhance the current ‘critical network’ which is imperative during the COVID-19 pandemic and will introduce 5G technologies to the area will support the local economy in this active setting. The most up to date

equipment will be provided and the benefits of the proposal far outweigh any perceived negative impacts. Other vertical elements in the form of associated road signage, bollards, speed camera units, traffic lights, mature trees, street lighting columns & business signs already exist in the street scene without causing any undue harm. It is considered that the proposed monopole will merely be seen as another vertical element in the street scene and fit within the industrial like nature. In all these circumstances it is contended that the proposal is suitable to the form and function of the site and therefore complies with Policy BE13. Furthermore, the applicant would like to refer to the photomontages provided which further provide evidence that the additional cell fits well within the context of the street scene.

### ***“Part 2 – Policy DMHB 11: Design for Development***

Part A of this policy sets out in detail design requirements for all development which it identifies should be of the highest standard. The policy includes a range of issues to be addressed including: harmonising with the local context; use of high-quality finishes and materials; maximising sustainability; protecting features of positive value within and adjacent to the site; and use of landscaping and tree planting.

It has been demonstrated that the proposed base station achieves a high-quality design taking into account the specific technical requirements for the proposal. The proposed monopole is the minimum height and girth for the proposal; it allows the sharing of facilities by two, otherwise competing, service providers (thereby avoiding proliferation of base stations); it is located close to existing tall street furniture which mitigates the visual impact of the proposal and ensures it fits well within the existing streetscape.

Part B notes developments should not affect amenity, biodiversity and green infrastructure. The proposal has no impact on trees or vegetation in the area.

### ***“Part 2 – Policy DMHB 12: Streets and Public Realm***

This policy sets out a range of factors to be considered in terms of streets and public realm. The additional cell is of the minimum height and scale necessary. The impact on neighbouring local spaces would be minimal due to the ‘light weight’ appearance of the additional cell and the presence of tall street lamps and telegraph poles within the existing streetscape which form part of the established townscape character. It has been demonstrated that the proposal will not affect the visual quality of the surrounding area and does not have an impact on the public realm. The applicant would like to make reference to the photomontages provided which further illustrate this point.

### ***“Part 2 – Policy DMHB 21: Telecommunications***

This policy sets out the specific requirements for telecommunications development:

- **It is sited and designed to minimise visual impact:** It has been demonstrated that the proposed site is the only feasible location. The visual impact is minimal compared with the existing situation.
- **It does not have a detrimental effect on the visual amenity, character or appearance of the building or the local area:** As demonstrated in the accompanying representative views, the visual impact of the proposals is minimal, and in any case, affects an area of very limited visual amenity
- **It has been demonstrated that there is no possibility of use of alternative**



**sites, mast sharing and the use of existing buildings:** A comprehensive review of alternative sites has been carried out, including mast sharing, and alternatives ruled out for sound operational reasons

- **There is no adverse impact on areas of ecological interest, areas or landscape importance, archaeological sites, Conservation Areas, or buildings or architectural or historic interest:** The application site does not occupy an ecologically sensitive area. GLAAS has confirmed that there would be no significant archaeological impact. There would be a neutral impact on the West Drayton Conservation Area since the area affected does not contribute positively to Conservation Area's historic character and appearance and since the proposals do not fundamentally alter the existing street scene.
- **It includes a Declaration of Conformity with the International Commission on Non-Ionizing Radiation:** ICNIRP certificate provided.

## CONCLUSION

There is a requirement for EE and H3G to provide advanced telecommunications technologies to this urban area in LB Hillingdon. Network planners have identified a need for an enhanced installation and the proposed development will address this identified need and continued customer demands.

The social and economic benefits of providing reliable and high quality mobile 5G connection support growth in productivity, efficiency and labour force. It is contended that the positive benefits to the modernisation of this mobile network service will outweigh any minor loss of visual amenity to the surrounding area.

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This application explains the technical need for the installation to provide improved customer service.

Furthermore, the applicant would also like to stress in today's current crises (COVID-19) it is imperative the communications is not only maintained but also enhanced to ensure capacity and real time data is at the forefront. Telecommunications is considered as a critical service as it is providing data to network operatives, field engineers, call centre staff, IT and data infrastructure, 999 and 111 critical services. This new cell will allow telecommunications infrastructure providers (EE/H3G) to assure quality, capacity and operational performance so that customers have uninterrupted access to crucial mobile and broadband services at specifically at this critical time.

In terms of siting and design, it is considered that the proposal responds well to the character and appearance of the local environment and will not have an unacceptable adverse impact on the application site or the surrounding area. The design is of a high standard, and will not detract significantly from the existing visual and environmental character of the area. The benefits to residents and visitors to the area far outweigh any potential perceived negative impacts. In all these circumstances it is concluded that there are no policy or other objections that would warrant the refusal of planning permission and accordingly permission should be granted for the proposed development.

## Contact Details



|                         |                                                                                                               |                          |                                                                                                             |
|-------------------------|---------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------------------------------------------------------------------------------|
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| <b>Signed</b>           | <b><i>S.Dhillon</i></b>                                                                                       | <b>Date</b>              | <b>01/04/20</b>                                                                                             |
| <b>Position</b>         | <b>Acquisition &amp;<br/>Planning Surveyor</b>                                                                | <b>Company</b>           | <b>Beacon<br/>Communications</b><br><br><b>For and on behalf<br/>of MBNL, EE Ltd &amp;<br/>H3G (UK) Ltd</b> |