



SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Opposite Renaissance Hotel	Site Address:	Bath Road Heathrow Hillingdon London TW6 2AQ
National Grid Reference:	E: 507950 N: 176932		
Site Ref:	HGN042/70573	Site Type: ¹	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. Re-use of an existing telecommunications site is the preferred option.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: No suitable alternatives were identified. Re-use of an existing telecommunications site is the preferred option.		

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:	18/02/2020
Was there pre-application contact:	No
Date of pre-application contact:	
Name of contact:	Chief Planning Officer
Summary of outcome/Main issues raised: Request for pre-application consultation emailed to the Planning Department, no response received to date	



Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Amber
The site was rated as red due to its proximity to the A4. Pre-application consultation letters were sent to the following people on 18th February 2020. Councillor Ali Milani Councillor Peter Money Councillor June Nelson John McDonnell MP No response received to date.	

School/College

Location of site in relation to school/college (<i>include name of school/college</i>):
The nearest educational establishment is Sipson Nursery, 595 Sipson Road, Heathrow, UB7 OJD
Outline of consultation carried out with school/college (<i>include evidence of consultation</i>):
Pre-consultation has been sent to the following email address - sipson@littlebrooknurseries.com on 18/02/2020.
Summary of outcome/Main issues raised:
No response received to date.

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

Will the structure be within 3km of an aerodrome or airfield?	Yes	
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	N/A	
Details of response: Full Planning application		

Developer's Notice

Copy of Developer's Notice enclosed?		No
Date served:	FULL PLANNING APPLICATION- Article 13 Notice served.	



The proposed site:

The proposed base station is situated to the south of the A4 at Bath Road. To the east of the M4 roundabout and north of Heathrow Airport. Off the A4, the area is commercial in nature. Large office buildings and associated airport buildings run alongside the carriageway, with residential dwellings within the wider areas beyond the active street front and Heathrow Airport. In this active setting, there is a need for enhanced communications vital to supporting development within the area.

Ensuring a full and reliable telecoms network has become even more critical following the COVID-19 pandemic. There is both a huge increase in people working from home and children using devices to study at home. This mast would contribute to a reliable and extensive telecoms network which plays a critical role in keeping society functioning during such a pandemic. This operator has currently designated its 4G service for the exclusive use of emergency services staff, meaning that further sites are necessary to support the existing networks, in addition to contributing to the introduction of 5G technologies. It is anticipated that many people will continue working from home, therefore, a reliable network providing a high-speed service to both residential and commercial areas is critical. Should a further wave of COVID-19 hit the country in the future, this ability to adapt to working from home quickly is essential in order to minimise societal disruption. Furthermore, this would support critical emergency services and health providers in their essential roles.

A recent application for a monopole of the same dimensions was granted in March 2020 (reference 57699/APP/2020/968) approximately 20m to the west of this application site. However, unfortunately this site could not be built out due to the discovery of underground services. Therefore, this application has been submitted. The proposed monopole would be located on the same dual carriageway as the previous proposal (and the existing mast), ensuring that its visual impact would be no worse than that which was recently granted approval.

Along the A4 there are a number of vertical features offering screening and context to the proposed base station. This includes; railings, traffic lights, associated road signage, large commercial units, trees and street lighting columns. The proposed monopole has been specifically located off this busy carriageway and away from residential development as to remain in keeping with the existing street scene.

The nearest residential dwelling is some 80m north. Situated beyond the A4, offices to the north side of the A4 and an additional minor road. Amid the housing and the commercial development south, there is a row of thick tree cover, acting as a buffer to the development beyond. Any potential views of the proposed monopole from these houses along Boltons Lane are to be seen from the rear and amongst existing vertical features, with Heathrow airport as the backdrop.

The nearest listed building is the Monument at North Western End of General Roy's Survey Base, a grade II listed building some 260m SW of the proposed site. The site sits adjacent to the Northern Perimeter Road and the adjoining Heathrow Airport. Being relatively small in elevation and situated beyond a number of large commercial units in this commercial setting. It is considered that the proposed monopole is to have no adverse effect on the monument.

The proposed site is not situated within any specific land designations. The Heathrow Airport boundary backs onto the site, at the South side of the A4. Heathrow Airport were consulted at the pre-consultation stage and chose to make no comment. With the existing mast being in place for some time, it is considered that the upgrading of the existing mast is to be of no affect to Heathrow.

The re-use of an existing site represents the preferred option, as outlined in the NPPF discussed in further detail below. 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 site has to fit into an existing network and re-using the existing site will mitigate the need for an additional site within the area and maintain the current level of network coverage.

Site notices notifying the public of the proposal have been put in place during the survey stage of site identification.

View of existing mast from the East, along the A4.



View of existing mast from the West, along the A4.





Planning History

57699/APP/2020/968

The installation of a 20m monopole, 12 antenna apertures, 7 equipment cabinets and the removal of the existing 14.7m monopole, 3 antennas, 5 redundant equipment cabinets and development ancillary thereto.

(this application cannot be progressed due to underground services meaning the development cannot be built as per the approved plans)

Approved – 17 July 2020

57699/APP/2015/1257

Replacement of existing 14.2-metre-high telecommunications monopole with a 14.7-metre-high telecommunications monopole with associated equipment cabinet

GPDO – Approved – 20-05-15

57699/APP/2002/2153

Erection of a 14.2-metre-high streetworks pole with integral antennas, two equipment cabins and ancillary development

GPDO – Approved - 04-11-02

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.

With the recent unprecedented increase in people working from home, it is essential to provide a network that can support this demand. Furthermore, this mast would form part of a network that supports the work of local businesses and health services, which are under increased demand due to the COVID-19 pandemic. It is anticipated that this unprecedented use of home offices and demand upon local services will remain long after restrictions have been lifted. Therefore, it is essential to be able to provide a reliable and comprehensive telecommunications network in order to support society's crucial needs at this challenging time.

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

Type of Structure (<i>e.g. tower, mast, etc.</i>):	
Description: - A telecommunications base station located at Opposite Renaissance Hotel, Bath Road, Heathrow, Hounslow, Hillingdon, London, TW6 2AQ. The proposed development will include the installation of a 20m monopole, 12 no. antenna apertures, equipment cabinets, the removal of the existing 14.7m monopole, 3 no. antennas, redundant equipment cabinets and development ancillary thereto.	
Overall Height: 20m	
Height of existing building (<i>where applicable</i>):	N/A
Equipment Housing:	
Length:	As per attached drawings
Width:	
Height:	
Materials (<i>as applicable</i>):	
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. Whilst the proposed replacement mast is taller than that which already exists, it needs to be in order to introduce the required technologies to the area. Although it will rise above the height of the existing installation, it is considered that the overall benefits of the scheme will offset any potential visual impact that may arise. The proposal needs to be seen in the context of the overall benefits of the introduction of 5G technologies to the area.

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.

Vertical features, large buildings and mature tree cover are present within this commercial setting providing screening and context to apparatus. The re-use of an existing telecommunications site will avoid the need for a proliferation of additional telecommunications sites in the immediate area.

The applicant acknowledges that there is a slight change of location, underground utilities prevent an exact replacement in the same position in relation to the existing site. Furthermore, removing the existing mast and locating the new base station in its place would leave an unacceptable hole in the network.

Ensuring a full and reliable telecoms network has become even more critical following the COVID-19 pandemic. There is both a huge increase in people working from home and children using devices to study at home, whilst schools are closed. This mast would contribute to a reliable and extensive telecoms network which plays a critical role in keeping society functioning during such a pandemic. This operator has currently designated its 4G service for the exclusive use of emergency services staff, meaning that further sites are necessary to support the existing networks, in addition to contributing to the introduction of 5G technology. It is anticipated that many people will continue working from home even after restrictions have been lifted. Therefore, a reliable network providing a high-speed service to both residential and commercial areas is critical. Should a further wave of COVID-19 hit the country in the future, this ability to adapt to working from home quickly is essential in order to minimise societal disruption. Furthermore, this would support critical emergency services.

It is noted that there is an increase in the scale of telecommunications development on the site. However, the proposed site will be seen in the context of the existing vertical features in the street scene. The proposed design is larger than existing street lighting column, road signage and nearby trees but it needs to be in order to function and upgrade the technologies available in the area. Any perceived negative visual impacts are far outweighed by the overall benefits of the scheme. It should be noted that the new technologies will provide advanced high-quality communications infrastructure essential for economic growth as sought by the NPPF and the proposed form of development provides the optimum solution in this instance.



4.0 Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) * International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		Yes	No
Frequency	To be provided on request		
Modulation characteristics ¹	To be provided on request		

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

The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation.



Power output (expressed in EIRP in dBW per carrier) 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. 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.	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 part of a combined solution to upgrade the existing site. The existing coverage will be maintained and the technology will be upgraded to provide 5G. It is therefore not considered necessary to provide coverage plots in this instance.

For the 5G upgrade, MBNL are not able to utilise the existing mast currently in place, as this site is unable to accommodate for the 5G equipment. Please see below the detailed justification, as to the reasons why the existing mast has been ruled out, and why the proposed (HS2) solution has been implemented;

Existing Street works Pole:

1. Existing Street works sites typically utilise 3x Sector Antennas at the same level with each antenna being shared by EE and 3UK. The antenna azimuths are directed 120deg apart to give 360deg total coverage for both operators.
2. Existing Street works antennas are used for 2G/3G/4G technologies for EE and 3G/4G for 3UK. In other words: voice, text and data services share the same antennas for both EE and 3UK.
3. The antennas in the current Street works pole are restricted to the 1800MHz/2100MHz frequency bands which limits the capacity of the sites. Additional 800Mhz, 1400MHz, 2600Mhz and 3500MHz bands are now available but these bands have different physical antenna requirements; the HS2 upgrades will enable usage of these additional bands to increase coverage and capacity and to enable 5G technology.

4. The existing shared antenna configuration restricts how Street works sites can be tuned for individual differences in capacity and coverage requirements between the EE and 3UK networks.

Replacement 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)
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 antenna 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 upgrade 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. In order to keep the number of base stations to a minimum, the use of existing sites is considered to provide the optimum solution and accordingly the proposed site upgrade should be viewed positively. As such, no alternative locations were sought in this instance.

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. Any perceived negative impacts will be far outweighed by the overall benefits of the scheme and the location of the apparatus on a building which already supports extensive telecommunications equipment will minimise its potential impact on the immediate environment.

All EE & H3G 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.

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator).

Site3	Site Name and address	National Grid Reference	Reason for not choosing4
RT			There are currently no buildings over 15m within the vicinity of the site that would be capable of accommodating telecommunications equipment.
ETS	Existing MBNL Mast, Opp Renaissance Hotel, Bath Road, Heathrow, Hounslow, Hillingdon, London, TW6 2AQ	E: 507930 N: 176934	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 due to underground utilities, the new mast and its associated equipment cabinets would not be able to fit in the exact location. This site will be replaced by the proposed, new design.
GF	Verge, Opp Renaissance Hotel, Bath Road, Heathrow, Hounslow, Hillingdon, London, UB3 5AY	E: 507929 N: 176923	Underground utilities run throughout the verge to the rear of the pavement, preventing the safe deployment of a telecommunications base station.
ETS	Hayes, Middlesex, TW6 2RT	E: 508775 N: 176875	The existing rooftop site is not suitable of accommodating for the additional 5G equipment. Having a negative impact upon the building's structural capacity.

The site is an existing telecommunications site which is to be replaced and upgraded, therefore the proposed location is considered the optimum solution.

³ ETS - Existing Telecomm site, ES - Existing Structure, RT - Roof Top, GF - Greenfield

⁴

SP - Site Provider, RD - Redevelopment Not Possible, T - Technical Difficulties, P – Planning O – Other



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, taking into account both local business needs and wider opportunities for development.* The proposal seeks the upgrade of an existing telecommunications site, rather than utilising land which has not previously been developed. This approach provides a sustainable solution to the need to upgrade 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 proposal allows for the re-use of an existing telecommunications site which will be upgraded to allow for the introduction of 5G technologies.

However, government guidance has changed. 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.*

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.

The scheme will not cause any undue impact on the services outlined above and fully complies with ICNIRP standards. An ICNIRP certificate is enclosed with the application. 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. It is considered the proposed development complies with the broad aims of the NPPF. It assists in the aim to keep the number of installations to a minimum, by utilising an existing site. The equipment has been sympathetically designed, with the pole being kept to the minimum practicable height for the required to accommodate 5G network coverage.



Local Planning Policy

The statutory development plan for the area is comprised of London Borough of Hillingdon Strategic Infrastructure Plan (May 2017), Local Plan Strategic Policies (Adopted 2012) and Saved Unitary Development Policies.

The London Plan, March 2016

“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.”*

It is contended that the installation will comply with Policy 4.11, securing the Mayor’s vision for the delivery of modern communications networks across London. The proposed installation will bring 5G to the area, supporting modern infrastructure and providing the best network connectivity possible. 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 services provided by the mast will benefit both the local community, businesses and visitors alike.

Following the current COVID-19 pandemic, it is anticipated that many people will continue working from home even after restrictions have been lifted. Therefore, a strong network providing a reliable and high-speed service to both residential and commercial areas is critical. Should a further wave of COVID-19 hit the country in the future, this ability to adapt to working from home quickly is essential in order to minimise societal and economic disruption.



“POLICY 7.5 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.”

The site in question is situated off Bath Road (A4), an active well-connected area with access to Heathrow Airport and much of Greater London. The immediate area is commercial in nature, with the Airport to the South and residential development to the North. Therefore, these high levels of activity result in a need for high quality, up to date telecommunications, vital to ensure the future prosperity of the area in general and ensuring that the needs of the community and businesses within the area are met.

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.

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 provide 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 Part 1) (Adopted 2012)

"Policy T4: Heathrow Airport

Recognising the economic importance of the airport to the borough this Hillingdon Local Plan: Part 1-Strategic Policies will support the sustainable operation of Heathrow within its present boundaries and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing the public transport interchange to provide the opportunity for a modal shift from the use of private cars and from short haul air to sustainable transport modes and providing transport infrastructure to accommodate economic and housing growth whilst improving environmental conditions, for example noise and local air quality for local communities."

Heathrow Airport lies to the South of the site, with the Northern boundary off the A4.



Situated outside the airport's boundary, there would not be an impact upon the workings and security of the Airport. Introducing 5G technologies into the area will have a significant impact upon the working of the airport, allowing data retrieval in real time. Aiding in the improved workings of public transport into the Airport. The 5G technologies are the highest capacity network mobile operators are able to offer, the enhanced communications will also support the growth of the area as a whole. With such high levels of traffic and an increasing demand on the telecommunications network, infrastructure has to adapt to meet these needs.

"Policy HE1: Heritage"

The Council will:

- 1. Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes: Historic village cores, Metroland suburbs, planned residential estates and 19th and 20th century industrial areas, including the Grand Union Canal and its features; Designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments; Registered Parks and Gardens and historic landscapes, both natural and designed; Locally recognised historic features, such as Areas of Special Local Character and Locally Listed Buildings; and Archaeologically significant areas, including Archaeological Priority Zones and Areas.*
- 2. Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant.*
- 3. Promote increased public awareness, understanding of and access to the borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities.*
- 4. Encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset."*

The proposed works are not to have a negative impact upon any surrounding Heritage assets. The nearest listed building is a monument at General Roy's Survey Base. Situated some 270m to the South West and within Heathrow Airport. With much clutter and commercial development within the immediate area. In addition to a couple of large buildings situated amid the mast and the monument, any view of the proposed monopole is to be seen amongst existing clutter and vertical features. Mitigating any potentially harmful views and preserving the character of the monument whilst remaining in keeping with the existing setting.

"Policy EM7: Biodiversity and Geological Conservation"

The Council will review all the Borough grade Sites of Important Nature Conservation. Deletions, amendments and new designations will be made where appropriate within the Hillingdon Local Plan: Part 2- Site Specific Allocations Local



Development Document. These designations will be based on previous recommendations made in discussions with the Greater London Authority.

Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to:

- 1. The conservation and enhancement of the natural state of: Harefield Gravel Pits Colne Valley Regional Park Fray's Farm Meadows Harefield Pit*
- 2. The protection and enhancement of all Sites of Importance for Nature Conservation. Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss. Borough Grade 2 and Sites of Local Importance will be protected from loss with harmful impacts mitigated through appropriate compensation.*
- 3. The protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plans.*
- 4. Appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation (SINCs) in close proximity to development and to deliver/ assist in the delivery of actions within the Biodiversity Action Plan.*
- 5. The provision of biodiversity improvements from all development, where feasible.*
- 6. The provision of green roofs and living walls which contribute to biodiversity and help tackle climate change.*
- 7. The use of sustainable drainage systems that promote ecological connectivity and natural habitats."*

The site complies with Policy EM7. Being so close to Heathrow Airport and such active areas of Hillingdon. There are no biodiversity features within the area at risk as a direct result of the erection of the telecommunications base station. Located upon the pavement off the A4, trees and shrubbery to the rear of the site are to remain during the development of the site.

"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;*
8. *Providing facilities and services that are accessible and inclusive to all potential users regardless of age, ability, gender or socio-economic status; and*
9. *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.

With there being commercial businesses and Heathrow Airport within close proximity, the new technologies are to positively contribute to these businesses. Creating an attractive and modern environment, enhancing user experiences, building identity within the community and future proofing its success.

Whilst there may be some visual impact due to the increase in height, 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 BE1: Built Environment

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

1. *Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;*
2. *Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;*



3. *Be designed to include “Lifetime Homes” principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people’s lives;*
4. *In the case of 10 dwellings or over, achieve a satisfactory assessment rating in terms of the latest Building for Life standards (as amended or replaced from time to time);*
5. *Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance;*
6. *Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;*
7. *Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;*
8. *Create safe and secure environments that reduce crime and fear of crime, antisocial behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals;*
9. *Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas;*
10. *Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Hillingdon Local*



Plan: Part 2- Development Management Policies Local Development Document (LDD). All developments should be designed to make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill;

11. In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape.

Support will be given for proposals that are consistent with local strategies, guidelines, supplementary planning documents and Hillingdon Local Plan: Part 2- Development Management Policies

The proposed base station has been deployed in a specific location, adjacent to the existing mast. In a commercial setting and close to Heathrow Airport. There are no residential dwellings situated along the A4 with adverse views of the proposed monopole. The proposed monopole benefits from a compact headframe with a slim profile as to assimilate into the existing street scene with ease. Utilising the latest design techniques and technologies, ensuring the needs of the community are met and ensuring the character of the area is preserved. Situated adjacent to Heathrow Airport in order to conform with the existing setting and avoiding more sensitive locations within the wider area. other aspects of Policy BE1 are not directly relevant.

Hillingdon Local Plan Part 2 (adopted January 2020)

Policy DMHB 11: Design of New Development

A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

i) harmonising with the local context by taking into account the surrounding:

- scale of development, considering the height, mass and bulk of adjacent structures;*
- building plot sizes and widths, plot coverage and established street patterns;*
- building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;*
- architectural composition and quality of detailing;*
- local topography, views both from and to the site; and*
- impact on neighbouring open spaces and their environment.*

ii) ensuring the use of high quality building materials and finishes;

- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;*
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and*
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.*

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours

The proposed base station has been deployed in a specific location, adjacent to the existing mast. In a commercial setting and close to Heathrow Airport. There are no residential dwellings situated along the A4 with adverse views of the proposed monopole. The proposed monopole benefits from a compact headframe with a slim profile as to assimilate into the existing street scene with ease. Utilising the latest design techniques and technologies, ensuring the needs of the community are met and ensuring the character of the area is preserved. The proposal has been situated adjacent to Heathrow Airport in order to conform with the existing setting and avoiding more sensitive locations within the wider area. Taking this into account, it is considered that this proposal complies with this policy.

Policy DMHB 12: Streets and Public Realm

A) Development should be well integrated with the surrounding area and accessible. It should:

- i) improve legibility and promote routes and wayfinding between the development and local amenities;*
- ii) ensure public realm design takes account of the established townscape character and quality of the surrounding area;*
- iii) include landscaping treatment that is suitable for the location, serves a purpose, contributes to local green infrastructure, the appearance of the area and ease of movement through the space*



- iv) *provide safe and direct pedestrian and cycle movement through the space;*
- v) *incorporate appropriate and robust hard landscaping, using good quality materials, undertaken to a high standard;*
- vi) *where appropriate, include the installation of public art; and*
- vii) *deliver proposals which incorporate the principles of inclusive design. Proposals for gated developments will be resisted.*

B) Public realm improvements will be sought from developments located close to transport interchanges and community facilities to ensure easy access between different transport modes and into local community facilities.

The proposed base station has been deployed in a specific location, adjacent to the existing mast. In a commercial setting and close to Heathrow Airport. There are no residential dwellings situated along the A4 with adverse views of the proposed monopole. The proposed monopole benefits from a compact headframe with a slim profile as to assimilate into the existing street scene with ease. Utilising the latest design techniques and technologies, ensuring the needs of the community are met and ensuring the character of the area is preserved. The proposal has been situated adjacent to Heathrow Airport in order to conform with the existing setting and avoiding more sensitive locations within the wider area. Therefore, it is contended that the proposal complies with this policy.

Policy DMHB 21: Telecommunications

Telecommunication development will only be permitted where:

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

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.



Furthermore, following the current COVID-19 pandemic, it is anticipated that many people will continue working from home even after restrictions have been lifted. Therefore, a strong network providing a reliable and high-speed service to both residential and commercial areas is critical. Should a further wave of COVID-19 hit the country in the future, this ability to adapt to working from home quickly is essential in order to minimise societal and economic disruption. Furthermore, the proposed mast would contribute to a telecommunications network supporting emergency services and local health providers. These are critical services in the current pandemic climate

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.

Policy DMAV 1: Safe Operation of Airports

A) The Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.

B) In consultation with the Airport Operator, the Council will ensure that: i) areas included in Airport Public Safety zones are protected from development which may lead to an increase in people residing, working or congregating in these zones; and ii) sensitive uses such as housing, education and hospitals are not located in areas significantly affected by aircraft noise without acceptable mitigation measures.

The application site is situated approximately 750m to the north of the application site and would be 20m in height. The dimensions and location of this proposed monopole would ensure that this development would not pose any hazard to aircraft safety. Therefore, it is contended that this policy would be complied with.

Saved Unitary Development Policies.

“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.”

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.

The proposed 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 and the re-use of an existing site is the preferred solution, as indicated in the NPPF. 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 BE37 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, which will introduce 5G technologies to the area will support the local economy, businesses and services 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.

Street lighting columns run along both sides of the carriageway, with similar vertical lines. Furthermore, other vertical elements are present within 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. 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.



CONCLUSION

We consider that the development complies with both national and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system that will be of significant benefit to the community.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

The social and economic benefits of providing reliable and high quality mobile 5G connection support growth in productivity, efficiency and labour force. We believe that the strong 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.

Following the current COVID-19 pandemic, it is anticipated that many people will continue working from home even after restrictions have been lifted. Therefore, a strong network providing a reliable and high-speed service to both residential and commercial areas is critical. Should a further wave of COVID-19 hit the country in the future, this ability to adapt to working from home quickly is essential in order to minimise societal and economic disruption. Furthermore, the proposed mast would contribute to a telecommunications network supporting emergency services and local health providers. These are critical services in the current pandemic climate.

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 no policy or other objections that would warrant the refusal of planning permission and accordingly permission should be granted for the proposed development.