

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Eastcote Road SW	Site Address:	Highways land at Eastcote Road, Eastcote Village, Hillingdon, HA5 2QW
National Grid Reference:	510588, 188638		
Site Ref Number:	CTIL-147016 TEF-09076	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why: N/A – upgrade of an existing installation.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: N/A – upgrade of an existing installation.		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: No formal pre-application correspondence has been undertaken as the application is for a minor relocation of the monopole approved under application reference 59310/APP/2015/4125 (granted at appeal).	

¹ Macro or Micro

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: No formal pre-application correspondence has been undertaken as the application is for a minor relocation of the monopole approved under application reference 59310/APP/2015/4125 (granted at appeal).			
Summary of outcome/main issues raised (include copies of relevant correspondence): N/A			

School/College

Location of site in relation to school/college (<i>include name of school/college</i>): The site is located within 0.3 miles of Honey Bears Montessori Nursery.
Outline of consultation carried out with school/college (<i>include evidence of consultation</i>): No formal pre-application correspondence has been undertaken as the application is for a minor relocation of the monopole approved under application reference 59310/APP/2015/4125 (granted at appeal).
Summary of outcome/main issues raised (include copies of main correspondence): N/A

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	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	1 November 2018	

3. Proposed Development

The proposed site:
The existing installation consists of a 17.5 metre high monopole on a highway verge on the western side of Eastcote Road, immediately adjacent to its junction with Field End Road. Ancillary equipment cabinets are located at the base of the pole.
Permission was granted at appeal in December 2016 to increase the height of the pole from 17.5 metres to 20 metres (application reference 59310/APP/2015/4125/ appeal reference APP/R5510/W/16/3155989). Unfortunately, due to underground services it is not now possible to utilise the approved pole location as the taller pole needs a larger foundation and this would interfere with existing underground services.
This proposal is purely to relocate the pole location to a site approximately 8.5 metres to the south-west of the approved pole location. The appeal decision approved the pole with a condition to colour the pole fir green (RAL6009). This revised application also proposes to colour the pole fir green.

Type of Structure (e.g. tower, mast, etc):	<i>Monopole</i>
Description:	The relocation of the 20 metre high streetworks pole from the approved location to a new location approximately 8.5 metres south-west on the same highway verge and development works ancillary thereto.
Overall Height:	20 metres
Height of existing building (where applicable):	N/A
Equipment Housings:	
Length:	N/A
Width:	N/A
Height:	N/A
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel coloured fir green (RAL6009).
Equipment housing – type of material and external colour:	No changes proposed to cabinets.

Reasons for choice of design, making reference to pre-application responses:
In designing the proposed scheme, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree.
There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the power source (meter cabinet or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and

the various support structures, grillages and fixings, often referred to in general terms as "development ancillary to" the base station.

As noted previously, this proposal relates to the minor relocation of a previously approved monopole. It is not considered there would be a material difference in the overall appearance of the site. It would still benefit significantly from the screening benefit of the trees in the area. One additional benefit is the removal of the monopole from the pedestrian footpath, an issue which has caused concern in the past.

It is considered the proposed equipment is appropriately located. It has been possible to devise a scheme which has a minimal visual impact on the surrounding area. The design would result in a less intrusive facility than other designs, therefore preserving the character and appearance of the area. It is further considered the proposal strikes an appropriate balance between operational and environmental considerations, and the impact of the development would be outweighed by the significant public benefit of the proposal.

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.		
When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account.		
In order to minimise interference within its own network and with other radio networks, Telefónica UK Ltd operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.		
As part of Telefónica UK Ltd's network, the radio base station that is the subject of this application will be configured to operate in this way.		
All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.		

The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		
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4. Technical Justification

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

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

The proposal would provide Telefónica and Vodafone with enhanced coverage to the surrounding area. It would provide localised coverage and link with sites in neighbouring cell areas to form part of the national network.

In addition to the voice and texts services available with 3G coverage, 4G (also known as LTE) allows users of the network to benefit from ultra-fast speeds when browsing the internet, streaming videos, or sending emails wherever they are. It also means faster downloads on the go.

The importance of mobile technology in the UK, and its contribution to the sustainability agenda is emphasised in a series of annual communication market reports published by OFCOM, (<https://www.ofcom.org.uk/research-and-data/multi-sector-research/cmr/cmr-2017/uk>). The 2017 report states:

'By June 2016, 44% of all fixed broadband connections were able to receive actual download speeds of 30Mbit/s or more, up from 38% a year previously. Nearly two-thirds of mobile subscriptions were enabled for 4G, up from 46% in 2015. Consumers are also using these networks more – average data use per fixed line residential broadband connection increased by 36% year on year to 132GB in June 2016, and average data use per mobile connection increased by 44% to 1.3GB.

Most households have both fixed broadband and a smartphone, and consumers are moving seamlessly between fixed and mobile connections. Our mobile-appbased research shows that around two-thirds of data connections made by our panel of Android smartphone users are via a WiFi network, with the remaining third via a mobile network.

Smartphones are the way many of us keep connected. They are now firmly established as the most widely owned internet-enabled device, with more than seven in ten consumers owning one, up by 5 percentage points from the previous year, and four in ten internet users consider smartphones to be their most important device for accessing the internet.

The increase in 4G availability and take-up, along with the availability of mobile tariffs with generous inclusive data allowances, contributed to a 44% year-on-year increase in average mobile data consumption – 1.3GB per connection in June 2016.'

It is therefore very important for 'mobile only' households that live and work and any businesses that operate in this part of the LPA's area, together with visitors and others who are staying in or travelling through the area, that the necessary indoor RF coverage is provided to enable them to have satisfactory mobile telephony and internet access, and

thereby help achieve the Government's objectives for inclusive development and the rollout of modern high-speed communications networks.

The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

It is for these reasons that the National Planning Policy Framework places such emphasis on encouraging the continued rollout of high-speed digital infrastructure networks, of which the proposed development will form a key part.

Predictive coverage plots are attached confirming the need for the development. Included are joint 4G plots for Telefónica and Vodafone, along with separate 3G plots for the two operators. The plots confirm the improvement in coverage from the current 17.5 metre high structure to the replacement taller structure.

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the local planning authority in understanding any technical constraints on the location of the proposed development.

5. Site Selection Process

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)

Site Type	Site Name and address	National Grid Reference	Reason for not choosing site
			N/A

If no alternative site options have been investigated, please explain why:

Paragraph 113 of the updated National Planning Policy Framework, in which the Government's supportive stance towards developing high quality communications infrastructure is laid out, states that "*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*".

The proposal is for works at an established telecommunications site and not for the development of a new site, thus the consideration of alternative sites is not appropriate. The applicant has examined its portfolio of sites in this region and determined that there are no alternatives in the area which can be upgraded to meet the specific technical requirement.

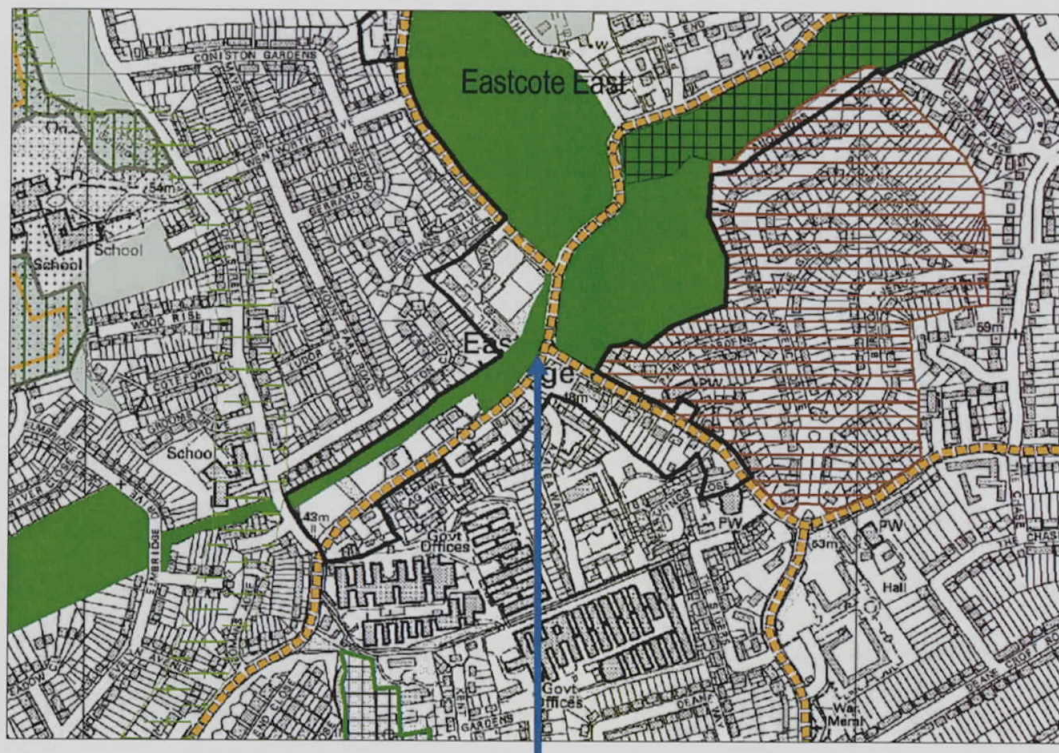
The application site represents the only feasible option in this instance which allows the requirement to be met without the deployment of an additional base station in the locality.

Environmental Information (refer to Section 2 of Site Finder Report):

As far as practicable the proposed development has been designed to keep to a minimum the impact on amenity and on heritage assets in the area. The use of an existing communications site and the design of the development ensures there would be only a limited impact. Impact on heritage assets would be outweighed by the benefits of the proposal.

A check of the Environment Agency website has confirmed the site is within a flood zone 1 area with a low risk of flooding.

Land use planning designations:



Site location

The above map is taken from the Council's UDP Proposals Maps. It confirms the site is located within a Conservation Area and an 'area forming links in green chain'. Eastcote Road and Field End Road are both 'local distributor roads'. In addition to the map above, 2 Field End Road (opposite the site) is a Grade II listed building.

Additional relevant information (planning policy and material considerations):

VISUAL IMPACT AND APPEARANCE

Visual impact has been minimised. As previously noted the proposal relates to the relocation of the pole which has already been granted consent. The pole is proposed to be coloured fir green as conditioned by the appeal decision for the site. The appeal decision letter (copy attached to the application) noted the issue of the appeal was whether the development would preserve or enhance the character or appearance of the Eastcote Village Conservation Area. The decision letter stated:

"The existing mast is relatively prominent in views along Field End Road to the south east. However, it is otherwise heavily screened from view in most directions by the surrounding trees, as I observed on my site visit. This was the case at a time of year when many of the trees have shed their leaves. Whilst the appeal proposal would be an additional 2.5 metres in height, it would be similarly screened from view in these directions. This screening would serve to limit the visibility of the proposal from much of the wider conservation area (Para 6).

The existing mast already detracts from the character and appearance of the area, and its replacement with a mast that would be both taller and bulkier would have an additional detrimental effect on this part of the conservation area. Accordingly, the proposal would fail to preserve or enhance the character and appearance of the conservation area (Para 7).

Given the presence of an existing mast, and extensive tree screening, the harm to the conservation area would be 'less than substantial' (Para 8).

On balance, I conclude that this public benefit would outweigh the 'less than substantial' harm to the conservation area in this case. The development would therefore be in accordance with the objectives of the Framework (Para 12)."

It is considered the circumstances remain the same as with the appeal decision and the public benefit would still outweigh the 'less than substantial' harm to the conservation area.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2018) (NPPF)

The new National Planning Policy Framework, which came into force in July 2018, replaces the guidance published in March 2012. The NPPF sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states "*The purpose of the planning system is to contribute to the achievement of sustainable development*", and in paragraph 10 that "*at the heart of the Framework is a presumption in favour of sustainable development*". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

*"a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

For **decision-taking** (paragraph 11) this means:

"c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

Further to this, paragraph 38 states that "Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area."

The proposed upgrade will enable the provision of reliable and improved mobile communications services to the surrounding area, bringing about substantial public benefit both socially as well as the allowing for certain businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the 'virtual office', thus reducing the need to travel and contributing to the sustainability agenda.

Government advice in recent years has been to promote and encourage communications services.

Within his presentation to Parliament in July 2015 of the Government report "Fixing the Foundations: Creating a more prosperous nation" the Chancellor of the Exchequer reiterated the importance of a high-speed digital communication infrastructure. "7.1 Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

By reducing regulatory red tape and barriers to investment, the government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published in March, of near-universal 4G and ultrafast broadband coverage."

The NPPF (2018) directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

*"b) infrastructure for transport, **telecommunications** (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"*

Leading on from this, paragraph 112 states that *"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections"*.

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 113 states that *"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"*.

By upgrading an existing installation to meet the required network enhancement, as opposed to the installation of a new site, the proposed is in line with the above policy.

It should be noted that paragraph 116 states that *"Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure"*.

The proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted development plan for the London Borough of Hillingdon comprises:

- The London Plan: Spatial Development Plan for Greater London;
- The Hillingdon Local Plan: Part 1- Strategic Policies; and
- The Saved Policies of the Hillingdon Unitary Development Plan.

These are discussed below:

The London Plan

The London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In Paragraphs 1.38-1.41 'Ensuring the infrastructure to support growth', the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to secure its long-term growth.

It is considered that the applicants' network is an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in Policy 4.11 'Encouraging a Connected Economy' of the Plan, which states that:

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 broadband access meeting the needs of 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."

At paragraph 4.55 of the supporting written justification to policy 4.11, the Mayor "wishes to ensure sufficient ICT connectivity to enable communication and data transfer within London, and between London, the rest of the UK and globally" and "...support ubiquitous networks – those supporting use of a range of devices to access ICT services beyond desk-based personal computers.." Furthermore, at paragraph 4.57, the Mayor states the intention to "...support competitive choice and access to communications technology, not just in strategic business locations but more broadly for firms and residents elsewhere in inner and outer London, and to address e-exclusion amongst disadvantaged groups."

Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing Telefónica and Vodafone to provide continued and enhanced coverage to the surrounding area.

Local Plan

Compliance with the regional guidance for London has already been discussed. Having had due regard to Hillingdon's strategic policies and saved development policies, and in particular to saved Policy BE37, it is submitted that there is no conflict between the council policy and proposed installation, the result of which would be provision of enhanced coverage with the minimal harm outweighed by the public benefits of the proposals.

The application accords with Policy BE37 as there is a clear need for the installation as demonstrated by the accompanying coverage plots; the development will provide coverage for multiple technologies for two operators from a single slim and unfussy design of pole; and, due to the specific location and design there will be a less than serious harm to the appearance of the townscape or landscape, and this harm would be outweighed by the public benefit of the proposal.

The proposal is ICNIRP compliant.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy the proposal is sympathetically designed, it minimises the number of installations and has a high quality of design. It would enhance the provision of local community facilities and services and would preserve heritage assets.

Summary

It is reiterated that this application **only seeks permission for the relocated pole position.**

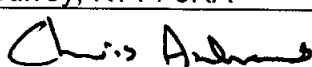
National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This development proposes improved coverage to the surrounding area for Telefónica.

A simple design solution is proposed to mitigate visual impact and prevent harm to the local environment. The minimal impact of the development would be outweighed by the benefits of improved coverage to the area.

The proposed development is compliant with the relevant policies from the NPPF and Development Plan, as outlined within this supporting statement. Heritage assets in the area would be preserved.

The proposal is fully compliant with ICNIRP guidelines and declaration of compliance has been provided.

Confirmation that submitted drawings have been checked for accuracy

Name:	Chris Andrews	Telephone:	01932 411011
(Agent)			
Operator:	Telefónica UK Ltd		
Address:	C/o Agents	Email	Chris.Andrews@waldontelecom.com
	Waldon Telecom	Address:	
	Phoenix House, Pyrford		
	Road, West Byfleet,		
	Surrey, KT14 6RA		
Signed:		Date:	5 November 2018
Position:	Planning Department	Company:	Waldon Telecom Ltd
		(on behalf of	
		CTIL and	
		above	
		operator)	