

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Fine Bush	Site Address:	Fine Bush Breakspear Road
National Grid Reference:	E: 508063 N: 188537		Ruislip Common Ruislip London: Hillingdon HA4 7SS
Site Ref:	HGN026/732713	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.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		
No suitable alternatives were identified.		

Annual Area Wide Information to local planning authority

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

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	22/05/2020
Was there pre-application contact:	
Date of pre-application contact:	
Name of contact:	
Summary of outcome/Main issues raised:	
No response.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Amber
The site was rated AMBER due to its site location and proximity to nearby Green Belt. Pre-application consultation letters were sent to the following consultees on 22 nd June 2020:- <ul style="list-style-type: none"> ○ Councillor Phillip Corthorne ○ Councillor Devi Radia ○ Councillor John Riley ○ MP David Simmonds 	
No response to date.	

School/College

Location of site in relation to school/college (<i>include name of school/college</i>):
No nearby schools.
Outline of consultation carried out with school/college (<i>include evidence of consultation</i>):
N/A
Summary of outcome/Main issues raised:
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?		NO
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		N/A
Details of response:		
N/A		

Developer's Notice

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

3.0 Proposed Development

The proposed site:

The proposed new mast has been sited and designed in order to provide 5G coverage and to support the existing mobile network. At present it is paramount that digital connectivity is supported and maintained throughout the country. In particular the current massive shift in user demand from city centres and places of work to residential areas and suburbs requires an improvement in coverage and capacity throughout the whole network. The current proposal therefore provides such additional capacity to the network whilst still promoting the improved 5G technology.

The proposed development is within the limits set out in Part 16 for permitted development with Prior Approval. The location enables the whole of the surrounding area to benefit from improved cover and capacity of the existing network as well as the introduction of 5G network coverage and has been designed to be future proof, thus enabling other technologies to be deployed depending upon the demand required. As the shift in demand is expected for the foreseeable future and that as central government considers digital communications to be a critical national infrastructure, we intend to support customers and local residents by ensuring as little disruption as possible. The existing site will therefore be retained so that all existing users may benefit at this difficult time. In addition, EE will become the Emergency Services Network Provider and in order to dedicate the 4G network for that use, the intention is to support all users during the current climate and to maintain all current services without the removal of any existing equipment.

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

The additional cell is to be located on the grass verge area just off Breakspear Road, adjacent to the bus stop, an area populated by residential dwellings and large open space. Some 91.5m North-West of the additional cell is Middlesex stadium and faces onto the nearby Green Belt. Situated within the vicinity, approx. 2km South of the additional cell location is Ruislip tube station, 1.7km South-West is West Ruislip station with the Metropolitan and Piccadilly lines running westbound situated 1.5km. The A4180 is located approx. 469km North-West and leads directly into the heart of Ruislip.

Residential dwellings and open space occupy most of the area surrounding the additional cell. Directly West behind the backdrop of matures trees along Stowe Crescent, dwellings are situated at their closest approx. 20m from the additional cell. The applicant would like to highlight that the dwelling situated on Stower Crescent, namely number 16 and 18 are orientated in a way that any views from the fenestration on the façade of these dwellings would mean that the additional cell would only be seen at an oblique angle. Furthermore, the existing mature tree foliage located on the same grass verge and existing high level fencing would further mitigate any harmful views.

Large areas of open space occupy the area to the East of the additional cell, notably, Mad Bess Woods, Bayhurt Woods, Park wood and Newyears Green Park, which in turn, are areas of high public activity. Moreover, the additional cell is to be located adjacent to The Woodman Pub and nearby bus stop with additional commercial units located further Northbound of Breakspear Road. Network planners have identified this site striking a balance between optimum coverage solution in terms of capacity and least harmful impact to the character of the area. The location has been specifically sited outside of the residential area and outside of the Green Belt to ensure there are no adverse effects whilst still optimising the coverage to the residents and visitors to the area.

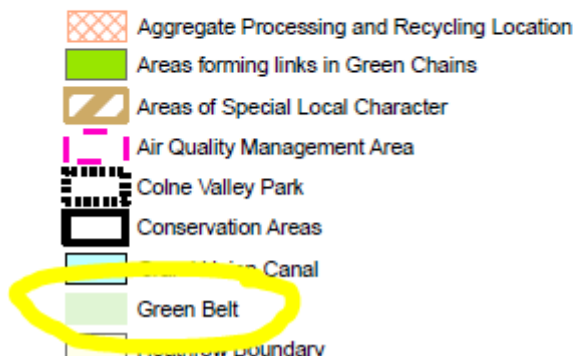
Existing vertical features running down Breakspear Road providing screening and further context to the additional cell and street scene alike, high rise mature trees run for the entirety of Breakspear Road, these are accompanied by existing street furniture such as associated furniture from the nearby pub, mid-high level fencing, mature trees/foliage, bollards, bus stop and street lighting columns amongst other visual splays which further mitigate any potentially harmful views of the additional mast. The aesthetical nature of the additional cell and linear arrangement of the cabinets will ensure that it fits well within the existing street scene.

The additional cell is not located directly within any restrictive land designation areas and has been further sited outside of the nearby residential area to ensure no undue harm is caused. The applicant would like to refer to the image below (*REF: FIG1*) which details where the additional cell will be located in relation to the existing land allocations nearby. The applicant appreciates that the site does lie next to the Green Belt area, however the applicant would like to stress that there will be no adverse effects to the Green Belt area due to no Green infrastructure being affected by the additional cell. Furthermore, the slim nature of the pole and linear arrangement of the cabinet's further mean there will be no adverse effects to the character of the area.

Figure 1: LB of Hillingdon Planning Policies Map (Additional cell location in yellow).



LONDON BOROUGH OF HILLINGDON LOCAL PLAN PART 2 - POLICIES MAP Adoption Version



Full consideration has also been taken when reviewing the historical heritage and listed assets within the area. The applicant would like to refer to the image below (*REF: FIG2*) which highlights the additional cell (in RED) and further illustrates the closest listed buildings to the site. The closest historical assets are approx. 83m Northbound which is Rose Cottage, a Grade II listed building. The applicant would like to state that the additional cell will have no adverse effects on this asset due to the distance and visual splays in-between both locations including existing buildings and mature tree cover. Therefore, the applicant would like to highlight the additional cell will cause no undue harm to the historical character of the area and therefore should be supported.

Figure 2: Historic England Map Search, HA4 7SS



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

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

For the avoidance of doubt, the applicant would like to stress this is a brand-new site and it to be used to support the current network in implementing 5G connectivity as well as increasing connectivity and capacity to much needed areas and therefore this application should be reviewed as a new site application.

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

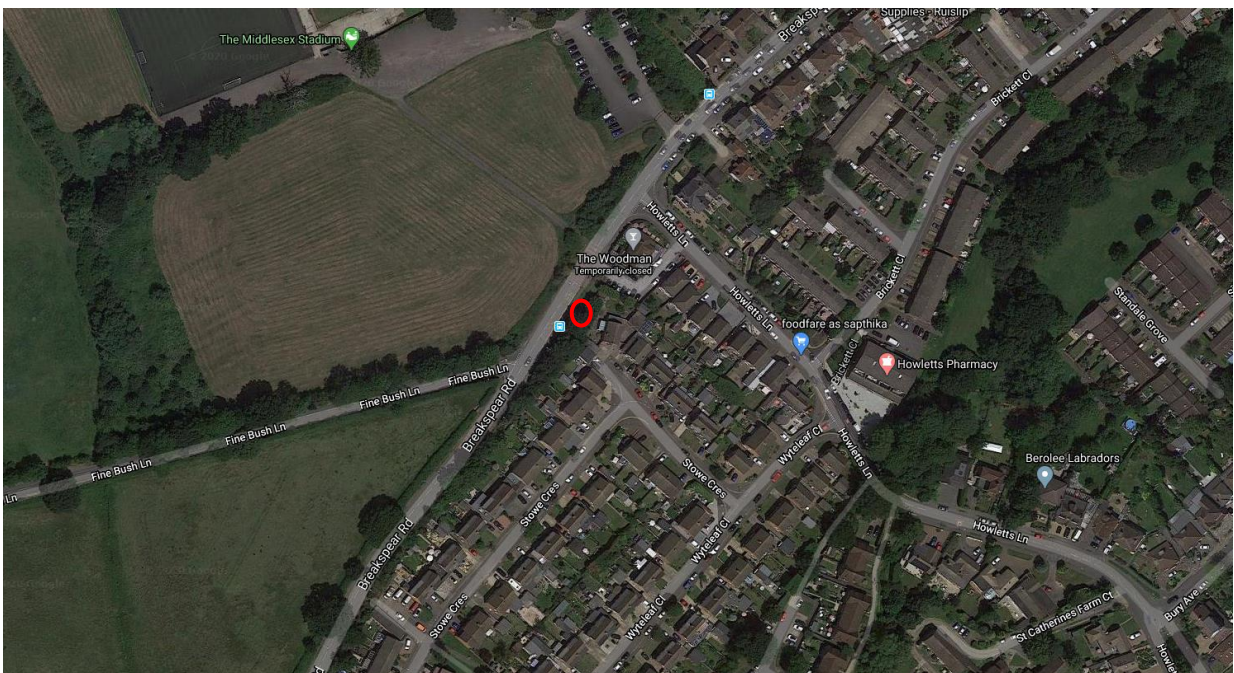
Streetview of the proposed site location heading South, along Breakspear Road.



Streetview of the proposed site location heading North, along Breakspear Road.



Birds eye view of proposed cell location, HA4 7SS



Planning History

Reference: 65930/APP/2015/2660

Removal of existing 12 metre high monopole and installation of a 13.7 metre high monopole with wrap around diplexer cabinet at base, installation of a pogona cabinet measuring 1230 x 400 x 1032mm located at ground level and associated development (application under Part 16 of schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 for determination as to whether prior approval is required for siting and appearance)

Approved- 03/09/2015

Reference: 65930/APP/2009/915

Installation of a 11.5m high imitation telegraph pole mobile phone mast and ancillary equipment cabinet (consultation under schedule 2, part 24 of the town and country planning (general permitted development) order 1995 (as amended)

Approved- 05/06/2009

Reference: 17942/APP/2002/2402

Current Telecommunications Use/ The Future

Since the date of the above decisions, 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. Additionally given the current Covid-19 crisis the government has 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".

5G is the next generation of technology to enable increased connectivity with increased data speeds. The growth of digital connectivity over the last decade and the expectations of users have advanced at an unprecedented level. The NPPF recognises that "Advanced high quality and reliable telecommunications infrastructure is essential to economic growth...", as will be considered in more detail below. The current proposal will provide positive benefits to the community which will far outweigh any perceived negative impacts. MBNL have produced an advisory note entitled 5G and Future Technology- Delivering the UK's Telecoms Future and this is enclosed as part of the application.

Enclose map showing the cell centre and adjoining cells:

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

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

Description: - The installation of the telecommunications cell located at Fine Bush, Breakspare Road, Ruislip, Hillingdon, London, HA4 7SS

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

Overall Height: 20m

Height of existing building (*where applicable*):

N/A

Equipment Housing:

Length:

As per attached drawings

Width:

Height:

Materials (*as applicable*):

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

As per attached drawings

Equipment housing – type of material and external colour:

As per attached drawings

Reasons for choice of design:

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

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

The mast will be seen amongst the backdrop of mature trees, located all across the same grass verge. Lighting columns, tree cover, street signage/bollards, bus stops, associated furniture of the nearby pub will all provide context. The apparatus has been specifically designed and sited, to allow for continued free flow pedestrian passage, upon the pavement. The additional cell has

been located as not to impede upon motorist's visibility splays when travelling along Breakspear Road and using the nearby Fine Bush Lane, avoiding conflict with nearby mature trees.

The location and appearance of the proposed cabinets is shown in drawings 215 and 265. These cabinets are all required for the accommodation of the new equipment to provide the 5G services. In total the new base station will require new cabinets to provide 2G, 3G, 4G and 5G technologies for both operators. The proposed cabinets are similar in size to those within the area (there is some variation but these are typically 1.5 m high x 1.1m long and 0.5-0.8m deep). The scale of the proposed cabinets is, therefore, relatively modest.

It is accepted that the proposed monopole would extend higher than the top of the crowns of the mature trees located on the grass verge just off Breakspear Road. However, the structure is slim and designed in a way that fits in within the surrounding street furniture. The proposed monopole would not have any significant adverse impact on the appearance or character of the location or the street scene. The monopole is slim in form and would be seen in the context of the current character of the locality with existing vertical elements, including street lighting columns, associated pub furniture, street signage, bus stops, bollards and the existing mature trees/foliage located on the same grass verge on either side of Breakspear Road. The latter would provide a screening to a large section of the monopole further mitigating visual impacts.

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

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

The applicant would like to highlight that there will be no cut back on vegetation or tree's to accommodate for the proposal. The additional cell has been sited outside of the Green belt and on the grass verge which currently does not house any green infrastructure and therefore supporting a design-led approach of effective land use. Furthermore, the applicant would like to mention that if the officer/LPA deem necessary the applicant would be willing to change the colour of the additional cell and associated equipment any colour that the LPA deem fit to further camouflage into the surroundings.

4.0 Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)		Yes	No
International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.			
All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.			
The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.			
Frequency	To be provided on request		
Modulation characteristics ²	To be provided on request		
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		

² The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase Modulation.

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

5.0 Technical Justification

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

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

Proposed HS2 Pole Design:

1. In order to maintain coverage (which is height dependent) for all frequency bands and technologies the lowest antenna height in the HS2 design must be the same as, or greater than, the antenna height of the existing Street works pole.
2. Reducing the antenna height would potentially remove coverage for existing mobile phone users.
3. The HS2 design contains 12x Individual sector antennas positioned at 4 levels (3x 120deg sector antennas per level)
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4. The antennas in the lower two levels provide 2G/3G/4G coverage in the 800MHz, 1400MHz, 1800MHz, 2100MHz and 2600MHz Bands. These antennas provide a mixture of voice, data and text to mobile phone users.
5. The antennas in the upper two levels provide 5G coverage in the 3500MHz band. These antennae provide 5G high speed / low latency packet data (for applications such as HD Video, Home Broadband and Machine to Machine Communications)
6. The 3500MHz band has the poorest radio propagation characteristics of all the presently available bands – this issue is somewhat mitigated by positioning them at the top of the antenna array.
7. Some vertical separation (0.5m) is required between antennas to prevent adjacent antennas interfering with each other.
8. Many elements of antenna sharing between EE and 3UK are removed in the HS2 design. This means that the site can be better tuned for EE and 3UK's individual coverage and capacity requirements.

Background:

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

recognising that advanced, high quality communications infrastructure is essential for sustainable economic growth.

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

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

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

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

Site ³	Site Name and address	National Grid Reference	Reason for not choosing ⁴
Location on Existing Tall Buildings			There are no tall buildings within the area capable of addressing the network requirement of this location. To address this requirement buildings would need to be generally in excess of 15m in height and there are none in the locality. Even if there were sufficiently high buildings then these would require roofs that are structurally capable of accommodating the required equipment, which would be in the form of a stub tower or roof pods. Such structures are likely to be more visually intrusive than a slim monopole as is proposed at the proposed new site.
Existing Mast	Existing EE and H3G Mast, Fine Bush, Breakspear Road, Ruislip, London, Hillingdon, HA4 7SS	E: 507999 N: 188458	The existing mast currently in place is not capable of accommodating for the 5G equipment, in its current form. Additionally, due to the lack of room caused by the underground utilities, the new mast and its associated equipment cabinets would not be able to fit in the exact location. Furthermore, the additional cell is to support the current network capacity/coverage whilst providing enhanced 5G connectivity.
Greenfield alternative	Fine Bush Lane, Northwood, London Borough of Hillingdon, London, UB9 6LY	E: 507858 N: 188446	The proposed mast location would provide good elevation, overlooking the surrounding area. However, the mast would need to be considerably higher in height 25/30M to ensure the same level of coverage would be provided as the proposed SW monopole base station.

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

			Furthermore, the GF option would have to be further located into the Green belt causing further harm and therefore this option has been discounted.
Sharing other operator masts	Co-location with existing O2/BF mast, Barkingside, Station Road, Barkingside, IG6 1NA	E: 544809 N: 189535	The operators are unable to co-locate with the existing mast in this location, this is due to interference from the existing mast and the proposed solution, in addition the mast is not suitable to accommodate the extra antenna needed to facilitate the level of capacity and coverage for 5G connectivity in the area and therefore this is deemed unsuitable.



Additional relevant information

Planning Policy Assessment

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

National Planning Policy Framework (2018)

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

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

In section 10 of the new NPPF, the document seeks to support “*Advanced, high quality and reliable communications infrastructure*” ensuring that it is “*essential to economic growth and social wellbeing*”. It advises that “*planning policies and decisions should support the expansion of electronic communications networks including next generation mobile technology (such as 5G) and full fibre broadband connections.*” Paragraph 113 states” *the number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.*” The applicant would like to highlight that if the LPA deemed necessary the applicant can paint the colour of all the equipment to further camouflage it into its surroundings. Green will be the most suitable option within this location and the applicant would adhere to this condition.

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

a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and



b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.

National Planning Policy Framework (2019)

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

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

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

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

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

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

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

Local Planning Policy

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

The London Plan, March 2016

“Policy 4.10 New & Emerging Economic Sectors

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

“POLICY 4.11 ENCOURAGING A CONNECTED ECONOMY Strategic

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

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

Policy 4.11 states that all strategic agencies should *facilitate the provision and delivery of ICT infrastructure* (Policy 4.11 A a) and to *support the use of information and communications technology to enable easy and rapid access to information and services* (Policy 4.11 A b). It has been demonstrated that the new proposal is well-designed and supports this policy.

Living Spaces and Places

“Policy 7.1 Local Character

Strategic

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

Planning decisions



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

LDF preparation

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

The applicant would like to highlight the slim design and linear arrangement of the cabinets have been created using the most up to date designs, furthermore the applicant would like to stress that if the LPA deemed necessary the equipment can be painted any colour to camouflage into its surroundings. The applicant would like to re-iterate the design and placement of this mast is site specific and has been chosen for optimal coverage to the area and least impact on planning designations and therefore it is contended this design is supported by Policy 7.1 part (b) & (c).

"Policy 7.19 Biodiversity and access to nature & Emerging London Plan Policy G6 Biodiversity and access to nature

Planning decisions

C Development Proposals should:

a wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity

b prioritise assisting in achieving targets in biodiversity action plans (BAPs), set out in Table 7.3, and/or improving access to nature in areas deficient in accessible wildlife sites



c not adversely affect the integrity of European sites and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.

D On Sites of Importance for Nature Conservation development proposals should:

a give the highest protection to sites with existing or proposed international designations¹ (SACs, SPAs, Ramsar sites) and national designations² (SSSIs, NNRs) in line with the relevant EU and UK guidance and regulations

b give strong protection to sites of metropolitan importance for nature conservation (SMIs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance

c give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.

E When considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest, the following hierarchy will apply:

1 avoid adverse impact to the biodiversity interest

2 minimize impact and seek mitigation

3 only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.

The applicant would like to highlight the necessity of having the proposed additional cell within this area, network planners have identified this site as a prime location to enhance coverage/capacity to the optimum level and bring new technologies to the area. The linear arrangement and slim nature of design has ensured little harm is done to existing trees and vegetation; furthermore this is not a land designated area, albeit boarding a Green Belt. However, the applicant would like to state that if the LPA deemed necessary the applicant would replace all green infrastructure affected by the proposed cell development. Therefore, it is contended that this does not warrant a reason for refusal and the public benefit/demand for this development is paramount. Furthermore, the colour scheme of the proposal can be altered to further fit in within the street scape and character of the area.

“Policy 7.4 Local Character

Policy 7.4 states that design should have regard to the form, function and structure of an area, place or street (Policy 7.4A). Regarding planning decisions, it states that the design response should have regard to the pattern and grain of spaces and streets and other factors (Policy 7.4B).

It has been noted that the proposal respects and takes into account the existing structures, residential dwellings and, more generally, the character of this section of Breakspere Road . The proposal is in a location which is partly screened by existing mature trees and hedgerows along with bus stops as well as being in a location with



significant vertical elements comprising lighting columns, existing trees, and signs as well as other significant street furniture including the existing base station which has been established in this location for some time. Therefore, the applicant would like to stress that the prejudice to the area does not outweigh the public benefit and current demand for improved coverage and capacity and therefore should be supported in relation to Policy 7.4.

“POLICY 7.5 PUBLIC REALM & Emerging London Plan

“Policy D8 – Public Realm

Strategic

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

Planning decisions

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

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

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

The height for the new cell is the minimum capable of providing the technological improvements sought. It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds than is possible using the existing technology, this is important in the current crises as it will support critical communication coverage.

This will enable places to remain competitive and will support the Government’s ambition for the UK to become a world leader in 5G; furthermore this will support the Government’s latest guidance regarding critical communications and COVID-19. The proposed mast needs to be taller than the existing masts within the vicinity to introduce the required new technologies to the area and satisfy ICNIRP requirements. It will

therefore rise above the height of the nearby trees and street furniture. However, due to the existing character of the area to harm to that character will not outweigh the significant benefits provided to the surrounding area.

“ Policy 7.6 Architecture

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

Emerging London Plan

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

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

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

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

This policy sets out guidelines to ensure the most effective use of land and space are utilised. In accordance to criteria B, this development has been designed on a site specific bases ensuring that it has the least impact to the character of the area and also ensuring that the most up to date design have been used. The slim nature of the pole and linear arrangement of the cabinets highlights this. The applicant would like to further emphasise that the development is not in a protected land designation area, the applicant does understand it borders the Green Belt but the choice of site has specifically been chosen to provide optimum coverage to the nearby area, furthermore the development gives a variety of benefits to the public and therefore it is contented that the proposal outweighs any perceived negative impacts and the small scale design ensures that the optimum level of land is used to fit the purpose of the development.

“Policy D4 – Delivering a good design

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

“ Policy GG1 Building Strong and inclusive Communities

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

“Policy G7 Trees and Woodlands

This policy outlines the protection of existing trees and woodlands; the proposed development seeks to prune some trees and vegetation to allow for the additional cell to be implemented. The applicant would like to highlight that none of the trees or vegetation within the area are within protected land designation areas or have TPO’s. Therefore, the pruning of these trees and vegetation will have minimal impact in this heavy industrialised area. Nevertheless, the applicant would like to highlight that any green infrastructure that required replacing would be done at the cost of the applicant if the LPA deemed it necessary.

“Policy E8 Sector Growth Opportunities and Clusters

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

“Policy S16 Digital Connectivity Infrastructure

Part B of this policy states that “Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access”. Furthermore, the supporting text for the policy states:

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

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

Hillingdon Local Plan – Parts 1 and 2 **Local Plan Strategic Policies (Adopted 2012)**

“Policy BE1: Built Environment

This policy identifies a range of design requirements to be met by the development. Those relevant to the development proposal are:

- **Achieve a high quality of design that enhances local distinctiveness, contributes to community cohesion and sense of place.** It has been shown that the proposal, through its design and siting, and proximity to mature trees and street furniture, achieves a high quality of design that fully respects the characteristics of its location and avoids the need for an additional cell in the locality.
- **Be designed to be appropriate to identity and context of Hillingdon’s buildings, townscapes, landscapes and views and too protect local amenity.** It has been demonstrated that the proposed cell, fully respects the context of the local area. The images of the area shown prior demonstrate that the proposal will not have an adverse impact on local views and will not affect the amenity of residents, pedestrians or other users. Furthermore, the additional mast will utilise the same land with existing equipment ensuring a sustainable approach to development.
- **Improve the quality of the public realm.** Although the additional cell is taller and there will be further cabinets within the vicinity, the location of these close to mature trees on the grass verge in a linear arrangement will minimise visual impacts while at the same time, securing a significant enhancement of digital mobile connectivity.

Part 1: Vision for Hillingdon

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

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

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

“Policy BE37

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

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

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

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

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

“Policy BE13

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

Whilst there will be an increase in the height of the installation, it is contended that the proposed mast, the additional cell will support and enhance the current ‘critical network’ which is imperative during the COVID-19 pandemic and will introduce 5G technologies to the area will support the local economy in this active setting. The most up to date equipment will be provided and the benefits of the proposal far outweigh any perceived negative impacts. Other vertical elements in the form of associated road signage, street lighting columns, foliage, mid-level fencing, bollards, bus stops, business signage and mature trees already existing in the street scene without causing any undue harm. It is considered that the proposed monopole will merely be seen as another vertical element in the street scene and fit within the industrial like nature. In all these circumstances it is contended that the proposal is suitable to the form and function of the site and therefore complies with Policy BE13.

“Part 2 – Policy DMHB 21: Telecommunications

This policy sets out the specific requirements for telecommunications development:

Minimise visual impact. It has been demonstrated that the proposal minimises visual impact, as far as it is able to and that there is no significant detrimental impact arising. This reflects the location of the site close to mature trees, the character of the surrounding area, numerous existing vertical elements in the street scene and existing street furniture.

Not have a detrimental impact on visual amenity, character or appearance of the building or local area: The proposal has a very limited impact on residential amenity as a result of screening and oblique angles from the surrounding properties, and being separated by roads and other features. Impact on the character of the local area has been addressed in i) The fenestration on the façade of the residential assets located 25M East will be mitigated by the backdrop of mature trees and also mature trees on the grass verge located in between the view from the residential assets to the additional mast.

Demonstrated that there is no possibility for use of alternative sites, mast sharing and use of existing buildings. It has been demonstrated that there are no suitable alternatives in terms of existing masts or use of tall buildings and the current proposal is shared by two operators.

There is no impact on natural history and heritage interests. It has been demonstrated that the proposed development is not anticipated to have an adverse impact on nearby trees, furthermore the proposed additional cell does not reside within any restrictive land designation areas and therefore will not cause any net loss to the character of the area, nor directly affects any historical assets or heritage locations.

It includes the appropriate ICNIRP certification. ICNIRP certification has been provided



It is accepted that the proposed monopole would extend higher than the top of the crowns of the mature trees located on the edge of Breakspear Road. However, the structure is slim and designed in a way that fits in within the surrounding street furniture. The limited visual impact of the proposed monopole will fit within its surroundings; there are already high rise vertical features within the vicinity. The proposed monopole would not have any significant adverse impact on the appearance or character of the location or the street scene. Network Planners have indicated that the position of the additional cell is the ideal location to provide optimum coverage to both enhance the capacity of the current network and also bring advanced technologies to the area. Alternatives were considering using the sequential approach however was all discounted as illustrated later within the SIT form. It should be noted that the new technologies and increase to the existing network will provide high-quality and high-speed critical communication infrastructure, this is essential for economic growth and to improve a critical service as illustrated in the NPPF and Government COVID-19 aim.

“4.2.6 Telecoms and Broadband”

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

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

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

Securing a 5G development will improve the social and environmental conditions in the area and will provide significant benefits to the community in general. The current application forms part of a multi-million-pound trial of new high-speed connectivity, paving the way for the future rollout of 5G across the UK. The additional cell 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.

It is assured that the presence of 5G within the area will provide significant benefits to both the local community and businesses alike. The proposal incorporates the latest technologies and design techniques to ensure that the proposed monopole will be as easily assimilated into the existing environment as it is able to be. 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.

Local Plan Strategic Policies (Adopted 2012)

“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, Metro-land 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 installation is not located within any specific designations, the nearest being the metropolitan Green Belt, approx. 26m North of the installation. Additionally, the nearest listed building is situated approx. 92m to the North East of the installation namely the Rose Cottage, a grade II listed building. It has been deemed that this proposal would have no adverse effect upon the listed building as the building would not see the monopole due to screening and its set back position from the road.

“Policy CI1: Community Infrastructure Provision

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

- 1. Resisting of the loss of community facilities, and where the loss of these facilities is justified it will seek to ensure that resulting development compensates these uses to ensure no net loss;*
- 2. Supporting the retention and enhancement of existing community facilities;*
- 3. Supporting extensions to existing schools and the development of new schools and youth facilities;*
- 4. Encouraging the development of multi-purpose facilities that can provide a range*



of services and facilities to the community at one accessible location;
5. Promoting innovation in service provision and recognising that there are a range of modes appropriate for providing for all sections of the community;
6. Requiring development to contribute towards the provision of community facilities to meet the needs of new communities and mitigate impacts on existing communities;
7. Locating libraries, health facilities, police facilities, leisure facilities and community centres in town centres or other accessible locations to maximise community access, sustainable transport and build a sense of local community identity;
8. Ensuring new facilities demonstrate how they will tackle climate change, in line with Policy EM1;
9. Providing facilities and services that are accessible and inclusive to all potential users regardless of age, ability, gender or socio-economic status; and
10. Implementing a borough-wide Community Infrastructure Levy (CIL) to fund community infrastructure provision."

The proposed installation will bring 5G to the area, supporting modern infrastructure and providing the best network connectivity possible across Hillingdon. The 5G network is to be the fastest service operators are able to provide, the new technology will enable easy and rapid access to information. The additional cell is located within an area, populated by a vast amount of schools; the services provided by the mast will benefit the local community, educational establishments and businesses within the immediate area. Whilst there will be some visual impact it is contended that the character and appearance of the area will not be unacceptably harmed and the overall benefits of the proposal will outweigh any perceived harm.

Policy DMEI 4 Development in the Green Belt or on Metropolitan Open Land

A) Inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.

B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

- i) the height and bulk of the existing building on the site;
- ii) the proportion of the site that is already developed;
- iii) the footprint, distribution and character of the existing buildings on the site;
- iv) the relationship of the proposal with any development on the site that is to be retained; and
- v) the visual amenity and character of the Green Belt and Metropolitan Open Land.

The applicant would like to highlight this proposal is not within a land designed area and due to high quality design and vast quantity of screening available the site would not negatively harm the green belt. In addition the applicant would like to stress the existing monopole has been in situ for some time.

Policy DMEI 6: Development in Green Edge Locations

New development adjacent to the Green Belt, Metropolitan Open Land, Green Chains, and Sites of Importance for Nature Conservation, Nature Reserves, countryside, green spaces or the Blue Ribbon Network should incorporate proposals to assimilate

development into the surrounding area by the use of extensive peripheral landscaping to site boundaries.

The applicant would like to stress 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, to enhance the coverage of the existing 2G/3G/4G networks and also implement 5G technologies providing enhanced coverage to the public and emergency services alike. Furthermore, the height for the new cell is the minimum capable of providing the technological improvements sought. The slim design of the monopole in conjunction with the existing vertical street furniture (mature trees, street lighting, and street signage) will provide screening and as such will also reduce any perceived negative visual impact.

Policy DMT 1: Managing Transport Impacts

A) Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable they are required to:

i) be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development; ii) maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users; iii) provide equal access for all people, including inclusive access for disabled people; iv) adequately address delivery, servicing and drop-off requirements; and v) have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.

B) Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds. All major developments¹¹ that fall below these thresholds will be required to produce a satisfactory Transport Statement and Local Level Travel Plan. All these plans should demonstrate how any potential impacts will be mitigated and how such measures will be implemented.

Due to the close proximity to a bus stop, the proposed development has been specifically designed to allow for continued free flow pedestrian passage, upon the pavement. The additional cell has been located as not to impede upon motorist's visibility splays when travelling along Breakspeare Road and using nearby junctions, avoiding conflict with nearby mature trees.

Policy DMT 4: Public Transport

A) The Council will support and promote the enhancement of public transport facilities, including at key interchanges that address the needs of the Borough. The Council may require developers to mitigate transport impacts from development proposals by improving local public transport facilities and services, which may include:

i) improvements to address inclusive access; ii) ensuring that bus stops are conveniently located for passengers; iii) implementation of bus priority and bus stop accessibility measures; iv) providing for bus route requirements and associated road



layouts; v) improvements to the network of services; and vi) improvements to infrastructure to support cycling.

B) Public transport measures may be required to be included in the highways layout design where they are identified in a transport assessment, travel plan or integral to the acceptability of the proposal

The development has been designed to not impeach upon the free flow of pedestrians accessing the bus stop by setting the site back from the footpath. The applicant would also like to highlight due to the slim design, the proposed development will not intrude upon bus users. . Whilst there will be some visual impact it is contended that the character and appearance of the area will not be unacceptably harmed and the overall benefits of the proposal will outweigh any perceived harm.

Conclusion

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

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

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

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

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.

Contact Details

Name (agent)	Sunny Dhillon Beacon Communications Services Ltd.	Telephone	07538544372
Operators	EE Ltd & H3G	Fax no	N/a
Address	Unit 10A Sovereign Park Cleaveland Way Hemel Hempstead HP2 7DA	Email address	Sunny.Dhillon@beaconcomms.co.uk
Signed	<i>S.Dhillon</i>	Date	01/04/20
Position	Acquisition & Planning Surveyor	Company	Beacon Communications For and on behalf of MBNL, EE Ltd & H3G (UK) Ltd