SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Falling Lane	Site Address:	Land at the junction of Falling Lane and Royal Lane, Yiewsley, UB7 8QR
National Grid Reference:	506658, 180956		
Site Ref Number:	150153	Site Type:[1]	Greenfield

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 – site upgrade.		
Were industry site databases checked for suitable sites by the operator:	Yes	**No**
If no explain why: N/A – site upgrade.		

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: Pre-application correspondence was sent to the LPA by email on 15 April 2019. No response has been received.	

[1] Macro or Micro

Community Consultation

Rating of Site under Traffic Light Model:	Red	**Amber**	Green

Outline of consultation carried out:
Pre-application consultation letters were sent by email on 15 April 2019 to the Yiewsley Ward Councillors, Cllrs. Ahmed-Wallana, Arnold and Deville and to the Member of Parliament for the area, Boris Johnson.

Letters were also sent on 15 April 2019 to the following properties close to the site:

- 18-40, 19-41 Frankswood Avenue
- 2-8A Royal Lane
- 84-94, 100-108 Falling Lane
- 18-28, 33-39 Kingston Avenue
- 80-92, 101-111 Yew Avenue

A total of 65 properties were consulted.

Summary of outcome/main issues raised (include copies of relevant correspondence):

No responses have been received.

School/College

Location of site in relation to school/college *(include name of school/college):*
The closest school to the site is Park West Academy on Park View Road, approximately 260 metres away.

Outline of consultation carried out with school/college *(include evidence of consultation):*
Due to the distance involved, and as this is an upgrade of an existing site, no consultation has been undertaken.

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 – full planning application.

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	N/A – full application	

3. Proposed Development

The proposed site:
The development site is an existing telecommunications installation located on land on the north-western side of the junction of Falling Lane and Royal Lane. The current development consists of a 12.5 metre high monopole with a single equipment cabinet at ground level. The site is on a grassed highway verge adjacent to a pedestrian footpath. The selected location is set well back from the roadside and benefits from screening to the rear provided by 10m high trees. The surrounding area is predominantly residential, with a suburban character, although there are a number of commercial uses in close proximity to this busy road junction. The existing site is currently shared by Telefónica (trading as O2) and Vodafone. The site provides 3G and 4G coverage to the surrounding area for Telefónica and 4G coverage for Vodafone. The upgrade of the site is required to enhance services, in particular in terms of speed and capacity. Improvements are particularly centred around 4G coverage. This upgraded development will assist in achieving the aim of providing wider scale connectivity and accords directly with the NPPF. A photograph of the existing development is shown below: 

Type of Structure *(e.g. tower, mast, etc):*	*Monopole*
Description: The replacement of the existing 12.5 metre high monopole with a new 17.5 metre high monopole supporting 6 no. antennas, the installation of 4 no. additional equipment cabinets and development ancillary thereto.	
Overall Height:	17.5 metres
Height of existing building *(where applicable):*	N/A
Additional Equipment Housings:	
Length:	1.898m/ 2 x 0.75m/ 0.65m
Width:	0.798m/ 2 x 0.798m/ 0.264m
Height:	1.645m/ 2 x 1.645m/ 1.215m

Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Steel with a grey finish to match the existing pole.
Equipment housing – type of material and external colour:	Steel with a grey finish to match the existing cabinet.

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.

In all aspects of the design now put forward the smallest practical components have been utilised to ensure that the visual impact of the development is kept to the absolute minimum. The existing pole has two sets of antennas, stacked in groups of three above each other. The lower antennas do not operate efficiently due to their height, with surrounding trees and buildings affecting the efficiency of the site. Therefore, there is a need to increase the height of the pole, so that the lower antennas propagate effectively. Added to this, the increase in height will extend the area achieving coverage from the site. The upgraded development proposes to enhance coverage and capacity to the area, in particular in terms of 4G coverage.

Although being taller and more substantial than the existing installation, the increase in impact would not be significant, and not sufficient to cause harm to the surrounding area, in particular in terms of visual or residential amenity. The pole is proposed to be coloured grey to match the colour of the existing pole.

The number of equipment cabinets are also proposed to increase. The additional space is required to house the substantial increase in radio equipment needed for the enhanced coverage. The cabinets are proposed to be coloured grey to match the existing cabinet. The colour of the pole and cabinets is considered to be acceptable for the location, however should the LPA consider an alternative colour scheme to be more suitable, then the Applicant would be happy to amend the colour scheme.

It is considered the proposed equipment is appropriately located. It has been possible to devise a scheme which has a minimal additional visual impact. 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)* 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 and Vodafone Ltd operates its networks 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 and Vodafone Ltd's networks, 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	**Yes**	No

and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		

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 and capacity to the surrounding area. It would provide improved localised coverage and link with sites in neighbouring cell areas to form part of the national networks.

In addition to the voice and texts services available with 2G and 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 development would allow improved capacity and download speed to customers in the area.

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 have been included as part of the planning application. The plots included are for Telefónica 4G coverage. The plots confirm that the area covered by the site would increase, however the site would also, importantly, improve the capacity of the site. Coverage levels from the site would be acceptable to meet coverage requirements.

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

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

Paragraph 113 of the revised 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:

As far as practicable the proposed upgraded development has been designed to keep to a minimum the impact of the development on the surrounding area. A taller monopole is proposed, however the additional impact would be minimal and not sufficient to cause harm to visual or residential amenity.

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

Land use planning designations:



Site location

The above map is taken from the Council's UDP adopted proposals maps. It confirms there are no designations affecting the site.

Additional relevant information (planning policy and material considerations):

VISUAL IMPACT AND APPEARANCE

An upgraded installation is required to provide enhanced coverage to the area for both Telefónica and Vodafone. The site would provide enhanced coverage for both Telefónica and Vodafone, in particular in terms of 4G coverage.

It is considered that the proposal utilises the most suitable design available to meet coverage demands. It is important to keep the impact of telecommunications development in the area to a minimum, in particular bearing in mind its location within a predominantly residential area, and it is considered this proposal achieves this. The substantial benefits of the proposal also have to be considered. Enhanced 3G and 4G coverage would be provided for both Telefónica and Vodafone from the shared site. It is considered the benefits of the proposal significantly outweigh the minimal additional impact on the surrounding area. The alternative of proposing

an additional installation in the area to provide the enhanced coverage would have a greater overall impact.

The existing installation benefits from tree screening from trees close to the site. Although the higher section of the monopole would be more visible, the trees would still assist in mitigating the impact of the development to an acceptable level. There is also a significant amount of street furniture in the area, in particular lighting columns which provide a vertical context for the pole. Other street furniture includes traffic lights and an electricity substation across Falling Lane. Both elements help to ensure the development would have a minimal and acceptable impact.

It is considered that the proposed location is the least visually intrusive site and design available to the applicant which also ensures the required level of coverage can be provided. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding visual harm to the site and its wider setting. The replacement monopole, although taller, would only have a minimal additional impact. This additional impact would not be sufficient to cause harm to the area and would be outweighed by the substantial public benefits of the proposal.

On balance this proposed location is considered to be the optimum location in terms of siting and design, with the limited harm it may impose on the surrounding area being outweighed by the provision of enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2019) (NPPF)

The new National Planning Policy Framework, which came into force in July 2018, replaces the guidance published in March 2012. The guidance has subsequently been updated in February 2019. 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-date, 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 development will enable the provision of reliable and enhanced 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 (2019) 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 utilising an established base station site, and providing enhanced coverage for two Operators, the proposal 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 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, relevant to the proposal, comprises:

- The London Plan: Spatial Development Plan for Greater London;
- The Hillingdon Local Plan: Part 1 – Strategic Policies (2012);
- Saved policies of the 2007 Unitary Development Plan.

<u>The London Plan</u>

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' networks are 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 enhanced high-quality coverage to the surrounding area.

<u>Local Plan</u>

Most relevant to the proposal is saved policy BE37 of the Unitary Development Plan which deals specifically with telecommunications. For ease of reference the policy is copied below:

> *"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."*

The existing installation provides coverage to an existing cell area, therefore there is an existing need which is currently being serviced. The proposal utilises an established communications base station which is shared by two operators. Using the site negates the

need for an additional installation in the area, which was an alternative. Use of a shared site ensures no proliferation of communications development in the area. Although a taller structure, the additional impact of the development has been kept to an acceptable level by utilising a slim and unfussy design of pole, coloured the same as the current pole. The additional impact would not be sufficient to harm visual or residential amenity.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy, it minimises the number of installations by sharing and would provide coverage for a wide range of technologies. It is of significance that the development ensures a continued and enhanced provision of local community facilities and services.

Summary

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. The upgrade to this existing site is proposed to provide enhanced coverage to the surrounding area for both Telefónica and Vodafone.

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

The proposed development is compliant with the relevant policies from the NPPF and Development Plan, as outlined within this supporting statement.

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

Confirmation that submitted drawings have been checked for accuracy

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Operator:	Telefónica UK Ltd		
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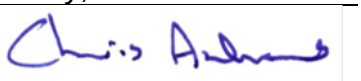
Signed:		Date:	2 May 2019
Position:	Planning Department	Company: (on behalf of Cornerstone and above operator)	Waldon Telecom Ltd