

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Cowley Business Park	Site Address:	Cowley Business Park, Uxbridge, London, UB8 2AD
National Grid Reference:	E: 505279 N: 182596		
Site Ref Number:	77573	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:		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	16.09.2020
Name of contact:	N/A
Summary of outcome/Main issues raised:	
Pre-application consultation letter, plans and consultation plan were issued to the London Borough of Hillingdon Council via tracked email on 15 Sept 2020. No response was received. It has, however, been decided to proceed with an application as it is considered that the best design has been put forward in order to achieve the technical requirements of the site, and due to the technical constraints that affect the design there is limited scope to alter the appearance of the site to a significant degree.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:			
Pre-application consultation letters were sent by tracked email on the 15 Sept 2020 to the Uxbridge South Ward Councillors and to the owner/occupier of the following addresses by post: • 3,5,7 Spencer Close, UB8 2AZ • 2-16 (evens only) Spencer Close, UB8 2AZ • 70-80 (evens only) Ferndale Crescent, UB8 2AY			
Summary of outcome/main issues raised (include copies of relevant correspondence):			
No responses have been received.			

¹ Macro or Micro

School/College

Location of site in relation to school/college (include name of school/college): <i>There are no schools/nurseries located within 250m of the proposal.</i>
Outline of consultation carried out with school/college (include evidence of consultation): N/A
Summary of outcome/main issues raised (include copies of main correspondence): N/A

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

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	28.09.2020	

3. Proposed Development

The proposed site:

- 3.1 EE and H3G (known as the operator Three) have a rooftop base station located at Brunel University, Engineering Block, Kingston Lane, Uxbridge, London, UB8 3PH which provides network coverage to the surrounding area. This site is in danger of being lost from the network for reasons beyond the operators’ control therefore, a replacement site is required to prevent any loss of services when the apparatus is removed.
- 3.2 The loss of an established site from the network can result in a loss of communications and data services locally and wider disruption to the network, if a replacement site capable of adequately replicating coverage within that specific area is not identified and integrated into the network at the earliest opportunity. A search of the area has been conducted for a replacement, which has included consideration of existing telecommunications sites, buildings and other sufficiently tall structures and, finally, locations for potential new ground-based apparatus.
- 3.3 The proposed site for the replacement base station is a grassed verge, along Cowley Business Park, Uxbridge, UB8 2AD.

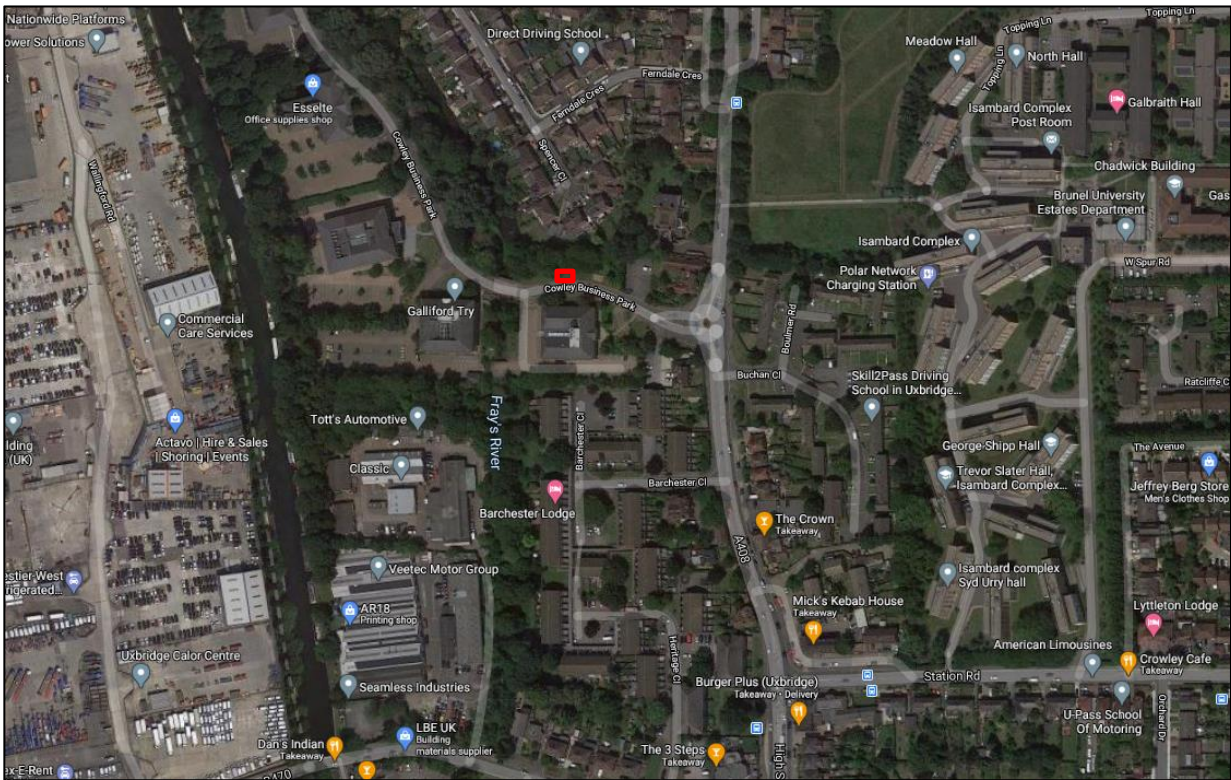


Figure 1. Aerial view of application site denoted in red and surrounding area. Map Source: Google Maps

- 3.4 The site is located on the approach to Cowley Business Park with the surrounding area comprising of mixed land use of commercial, industrial and residential buildings. In terms of the built environment, and notwithstanding the mixed used premises, the area contains a variety of street furniture, typical of an urban suburb. Lighting columns are generally set back from the roadside edge of the public highway, as are the majority of pole mounted road and traffic signs.
- 3.5 The proposed development would provide replacement, improved connectivity and network enhancement to the surrounding area for both EE and H3G. In order to achieve this, a site must be identified in reasonably close proximity to the community it is designed to serve. In addition, it will be possible to provide 5G coverage to the surrounding area without further external changes to the installation.

Enclose map showing the cell centre and adjoining cells if appropriate:

Network information is provided separately within this application.

Type of Structure (e.g. tower, mast, etc):		Monopole
Description:		
The installation of a 20m high monopole supporting 12no antenna apertures & 2no 300mm dishes; installation of 8no cabinets; ancillary development thereto. <u>FOR INFORMATION ONLY</u> As detailed on the accompanying plan, 8no. equipment cabinets, permitted by Class A of Part 16, Schedule 2 of the GPDO 2015 (as amended) are to be deployed. These do not form part of the application, but for information, their types and dimensions are as follows: 1No. MK5B Link AC (1.2x0.6x1.6m) 1No. H3G Pogona (1.230x0.4x1.032m) 2No. H3G RFC5906 (0.6x0.48x1.8m) 1No. H3G APM5930 (0.6x0.48x1.5) 1No. Wraparound (1.6x0.75x1.6m) 1No. EE Wiltshire (2.0x0.75x1.85m) 1No. EE APM5930&RF stack (0.6x0.48x1.6m)		
Overall Height:		20.00 Metres
Height of existing building (where applicable):		n/a
Equipment Housing:		
Length:		See above
Width:		See above
Height:		See above
Materials (as applicable):		
Tower/mast etc – type of material and external colour:	Steel – Galvanised	
Equipment housing – type of material and external colour:	Steel – Green/Grey	

Reasons for choice of design, making reference to pre-application responses:	
<u>Mast, antennas & dishes</u> 3.6 The objective of this site is to ensure existing coverage to the area is not lost, and disruption to the wider network is not caused, if and when the existing base station is decommissioned at Brunel University. When a site is decommissioned the obvious impact felt is the loss of coverage that this site provided, however, it can also cause greater disruption to the wider network. This is because each site connects to another, so if one is decommissioned the impact can reach far further than the immediate consumers. 3.7 The equipment layout and design are based on the principle of meeting the operational requirements of the mobile operators EE and Three (H3G), whilst minimising landscape and visual impact as far as technical constraints allow. 3.8 The base-station has been designed to accommodate replacement apparatus, allowing provision of 2G, 3G and 4G mobile connections to the surrounding area to continue. It has also been designed to accommodate new 5G technology, introducing ultra-fast mobile connectivity capable of operating the 'Internet of Things'. This upgraded and replacement infrastructure will provide higher mobile down-load speeds and more reliable, quicker phone connections. There would be increased capacity to provide services to a higher number of people at the same time. 3.9 These improved services can only be provided by using a higher number of antennas that are larger in scale than those at the existing site. This element of the design is informed by the number of communication services being provided (4G, 5G etc.); the fact that the base-station will be multi-operator meaning that both EE and Three (H3G) require an equal number of antennas; and because of the higher technical capability of the antennas. Hence the proposed high-capacity structure.	

- 3.10 The antenna height is determined by a specialist network radio engineer using specialist software which factors in the area where coverage is required, the relationship between the selected site location and existing cell sites in the linked network and variances in land levels amongst other things. In this instance, 20 metres has been calculated as the minimum height necessary to replicate as closely as possible the coverage that will be lost when the existing site is decommissioned.
- 3.11 The antennas must be allowed to unrestrictedly emit a radio signal, meaning they need to be sited at a high position at the top of the mast to enable the radio signal to clear surrounding structures, such as other structures and trees, with the aim of avoiding interference. The radio frequencies that 5G operates at is particularly sensitive to interference from solid objects, which necessitates a high-level structure on which to affix them.
- 3.12 The layout of the antennas is informed by physical constraints of the local area, and the outcome of software modelling which positions the antennas in such a way that they collectively provide 360-degree coverage to the surrounding area. Similarly, the dishes must connect to other base-stations in the wider network by microwave link. As such, they require 'line of sight' which an unobstructed path to neighbouring base-stations.
- 3.13 The dishes will be located on the tower at 12.75 metres where it can have a clear connection to the core network – ensuring that a seamless connection is achieved between the cells above the tree line and any other obstructions. The antennas for this site are located on the upper section of the tower and will supply 2G, 3G and 4G connection for the area as well as accommodate 5G once it becomes available.
- 3.14 As evident from the attached coverage plots the proposed application will successfully achieve the technical requirements and objectives. The proposed application will contribute to replacing the services from the site that will be potentially decommissioned, as well as provide enhanced and extended coverage to the wider area.
- 3.15 The aforementioned factors have informed the design of the proposed equipment which is of the minimum amount and scale possible, while still meeting structural and radio planning requirements.

Equipment cabinets

- 1.1 The antennas connect to the proposed equipment housing cabinets by electrical cable feeders. The equipment cabinets, an essential component of the base-station, must be located as close to the antennas as possible in order to minimise electrical power losses during operation. It is proposed to install the cabinets at the base of the mast, in a uniform, linear arrangement.
- 3.16 Prior approval is not being sought for the equipment cabinets as they represent Class A permitted development under Part 16 of schedule 2 of the GPDO 2015 (as amended).



Figure 2. View of application site facing east along Cowley Business Park.

- 3.17 In designing the proposed replacement installation, 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.
- 3.18 The applicant gives due regard in designing all new sites and site upgrades to the desire to limiting the visual impact through good design. In this instance, the proposed site is subject to technical and build constraints and there is no scope to alter the design from that now proposed. That notwithstanding, it is submitted that the appropriate siting and design put forth mitigates any potential impact on its surroundings to an acceptable level.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)	Yes	No
International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage, as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, EE & H3G operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of EE & H3G's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		

4. Technical Justification

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

4.1 The principle aim of the proposal is to replace communications coverage from an operational base-station at Brunel University, which will be decommissioned. The proposal is required in order to allow the continued provision of 2G, 3G and 4G mobile connections to the surrounding area. The proposed site is required as a replacement rather than additional base station within the area. 4.2 EE and Three (H3G) – two of the major licenced mobile operators in the UK – presently provides communication services to the surrounding area from a base station on the roof of Brunel University [Site Ref. 90779], approximately 660m east of the application site. This operational base-station must be decommissioned in the near future due to circumstances beyond the operator's control, generating need for a permanent replacement site to avoid a coverage gap in the mobile network.



Figure 3. Aerial view of Existing Site at Brunel University (Orange) and Application Site (Red). Map Source: Google Maps

- 4.3 Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV and downloads. The base stations are connected to each other and by cables or wireless technology to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. There are several variables that determine the size and shape of each cell.
- 4.4 Base stations are low powered radio transmitters therefore, they each have a limited range, meaning that they generally need to be located close to the area requiring coverage. If one moves too far away from that area, then it is likely that some areas will remain without the services they previously enjoyed.
- 4.5 When an existing site is lost from the network it leaves a very specific gap in coverage within the established network pattern which needs to be filled. The consequence of not doing so is that users of the network find that the services they previously had access to are either limited or completely removed.
- 4.6 Full coverage charts for both operators are enclosed with the application. The plots are modelled using a specialist tool and overlay shading on a base map to represent various signal levels, as shown on the associated plot key. The provision of poor communication services has well recognised economic and social impacts on communities and businesses. Please see enclosed coverage plots and following extract for predicted coverage loss.
- 4.7 It is pertinent to note that the plots show only the geographical reach of coverage. Capacity, the volume of call traffic that can be handled by any one base station at a given time, does not display on the plots.
- 4.8 High quality communications infrastructure is **essential for sustainable economic growth** and that high-speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.
- 4.9 The UK Government recognise the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. 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.

4.10 Mobile connectivity is becoming ubiquitous and the expectation is that it should be available throughout the country. From the first generation of analogue phones to modern 4G enabled smart phones, people have embraced the benefits provided by increased connectivity and the applications that smart phones can control. As digital systems and mobile telephony develop it has become apparent that the mere requirement to make a telephone call is secondary to the overall advantages and opportunities that modern smart phones and increased data speeds can offer.

4.11 Indoor coverage provision is imperative across the UK, this has been further highlighted by the COVID-19 Pandemic. Restrictions on travel resulting from the Coronavirus pandemic has resulted in a massive shift from office based to home working, from physical professional and social gatherings to virtual ones and to unprecedented reliance on online shopping and entertainment services. Usage within suburbs has increased dramatically as less people are travelling to town and city centres.

4.12 Keeping connected during this pandemic, helps healthcare services and other key workers respond to COVID-19, it helps those in lockdown at home interact with their loved ones via conferencing services, and it is also helping tens of millions of employees to work remotely. Without the installation subject to this application, the vital indoor levels, which allow customers to access services from within properties, would simply not be achieved.

4.13 As part of his Keynote speech¹, at a Connected Britain Event in September 2020 Matt Warman, Minister of Digital Infrastructure stated:

*'The world is in the middle of a digital revolution. **COVID has accelerated this process**, digitising almost every part of our everyday lives and **making the infrastructure that connects us more important than ever**. That's why it is at the **top of the government's agenda** [...] The opportunities provided by 5G are endless.'*

*'The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown - and is **now more important than ever as we head into recovery**. Many of these changes - such as increased working from home - will stay with us for the foreseeable future.'*

*'And because we know that more citizens are increasingly living their lives online, **we will be one of the earliest adopters of 5G coverage, with the majority of the population able to access 5G by 2027.***

'We are continuing to invest billions in supporting you to deliver better connectivity to the least commercial areas of the UK.'

*'We are taking forward legislative reforms to make it easier for you to deploy broadband in blocks of flats and to **deploy or upgrade mobile phone masts.**' (emphasis added)*

4.14 The Minister for Regional Growth and Local Government, Simon Clarke MP states:

"Councils play a critical role in delivering high-speed broadband and this new guidance will help them roll out this vital infrastructure more easily.

I want councils up and down the country to ensure their communities benefit from faster internet connections and better connectivity.

*This will help to **drive growth locally** and is part of this Government's mission to level up every area of our country and help local areas to recover after the pandemic."* (emphasis added)

4.15 The ministers are also asking councils to appoint a 'digital champion' to work across multiple teams to ensure a cohesive digital infrastructure strategy and encouraging authorities to use central government's dedicated 'barrier busting' team which is charged with **removing the obstacles to 5G rollout**.

4.16 The Planning Inspectorate too has in recent years continually recognised the importance of this issue and cited it in appeal decisions that have overturned the decisions of local authorities across the UK where there has been a failure to apply due weight to the value of connectivity to social and economic prosperity in the assessment of applications made for telecommunications development, even in protected or sensitive areas. As an example, in October 2018 the decision of Winchester City Council to refuse prior approval for the installation of a 17.5m high monopole and associated equipment housing, required to replace an established site being lost from Vodafone's

¹ Connected Britain 2020, Matt Warman: <https://www.gov.uk/government/speeches/matt-warman-keynote-speech-at-connected-britain-2020>

network, was overturned by the Planning Inspectorate (CTIL and Vodafone Vs Winchester City Council, appeal reference APP/L1765/W/18/3197522). Within the decision notice, the Inspector stated that:

"I attach significant weight to the public benefit arising from the continuation of local service provision.....Having regard to all relevant considerations.. my findings are that the proposal's public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area".

- 4.17 A similar circumstance exists in this case, with the application proposal required to prevent the loss of services on two networks, a matter certainly in the public interest.
- 4.18 Ofcom's Communications Market Report 2018 provides a figure of 92 million active mobile subscribers in the UK at the end of 2017. It details that 78% of adults now use a smartphone and that 76% of mobile users are using their devices for web and data access. Figures within the report also confirm that users are spending an increasing amount of timer per day using their mobile phone. 68% of participant in the Touchpoints research reported that they "could not live without" their mobile phone (rising to 78% among 25-34s).
- 4.19 As recognised by the London Assembly's Regeneration Committee within its "*Digital Connectivity in London*" report, published June 2017², digital connectivity is now widely regarded as the **"fourth utility", an everyday necessity alongside water, gas and electricity"** and also noted that "*mobile broadband is, and will continue to be, an essential complement of fixed broadband*". It is no longer a luxury, but a service essential to modern life.
- 4.20 The loss of services on two major networks at a time when reliance on connectivity services is a fundamental part of every day is simply unacceptable.
- 4.21 As introduced above in Section 3 of this document, the objective of this site is to ensure coverage to the area is replaced, and disruption to the wider network is not caused, due to the potential decommissioning of a nearby telecommunications site at Brunel University.
- 4.22 At a local level, this installation allows for an increase in home working, by providing the opportunity to create a "virtual office", reducing the need to travel for work as a consequence, which is helpful in supporting the sustainable development.
- 4.23 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 network coverage is provided to enable them to have satisfactory mobile telephone and internet access.
- 4.24 On a wider scale, the proposal would contribute towards the country's connectivity and digital economy future. Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion.
- 4.25 The very high level of mobile phone use and ownership within the UK population is a 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.

² Digital Connectivity in London report 2017: <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/digital-connectivity-london>

5. Site Selection Process

- 5.1 Site location is critical in network planning and becomes even more so when there is need to replace an existing base station already operating within the established cellular pattern.
- 5.2 When an existing site is lost, it leaves a very specific and unique gap in the network, much like removing a piece from a completed jigsaw would. This gap needs to be refilled if users living and working within in area are to be able to continue to use their mobile phones and other wireless devices. This places even greater limitations on the potential siting opportunities, as many locations will not enable this specific gap to be adequately filled.
- 5.3 When considering a replacement site for telecommunications equipment, there are many factors to be considered, not least the aesthetics of the site and planning considerations, but also the need to meet the network's requirements. The applicant has expended considerable time and efforts in identifying a suitable site which balances the coverage requirements with a host of other aspects, including the siting and appearance of the installation.
- 5.4 There are specific constraints associated with site placement in mobile network planning. It has already been touched upon that radio base stations can each only cover a limited geographical area known as a cell and that cells are designed to overlap to form an unbroken network. Site placement is always critical in network planning and becomes even more so when one is seeking to replace an existing base station already operating within the established cellular pattern. When an existing site is lost it leaves a very specific and unique gap in the network, much like removing a piece from a completed jigsaw would, which needs to be re-filled if users living and working within that area are to be able to continue to use their mobile phones and other wireless devices. This places even greater limitations on the potential siting opportunities as many locations will not enable this specific gap to be adequately filled.
- 5.5 Prior to selecting the proposed site, a comprehensive investigation was undertaken by the applicant's network planners, acquisition and planning agents to find a site specifically capable of replacing that on Brunel University. Potential sites are considered in terms of their technical suitability to provide the required level of service, the effect on visual amenity and their ability to be acquired, built and maintained. The aim of site identification is to find the most technically efficient site, which has the minimum impact on visual amenity. Various options might theoretically be suitable in terms of one of these considerations, but not the other. A balance between the two must be achieved.
- 5.6 In accordance with planning policy, a sequential approach to site selection was adopted. The potential to use an existing structure was given preference over installation of a ground-based mast. However, a suitable existing structure is not present to accommodate the required replacement equipment. Hence the proposal for a replacement ground-based mast.
- 5.7 The application site was selected following a thorough search and detailed investigations. The decision factored multiple considerations, including:
- distance from the base-station it will replace;
 - ground conditions and elevation level;
 - ability to acquire the land;
 - vehicle access to build/maintain the base-station;
 - potential for neighbouring trees & buildings to obstruct radio signal; and
 - minimising environmental impact, including protecting designated areas
- 5.8 On the matter of alternative sites, an appeal decision by the Planning Inspectorate clarifies that it is an unreasonable expectation to consider every potential siting option when searching for a site to install communications apparatus. The reference to the superseded PP8 still stands in the replacement NFFP:

'Nor do I consider that it is realistic or reasonable to take the view that the absence of consideration of every possible option alternative would mean this element of the policy was not complied with. PPG 8 does not indicate the need to embark on an examination of every possible alternative in an iterative process. As accepted at the Inquiry by the Council's planning witness, the adequate analysis of feasible alternatives is a more realistic approach, a view with which I concur' (para. 12) (Appeal ref. APP/Y3425/A/02/1084110) (emphasis added)

5.9 This view has been supported and echoed by the Planning Inspectorate in overturning the decision of Sheffield City Council (Appeal ref: APP/J4423/W/17/3188962) which stated:

“I am mindful that even if alternative sites were available, there is no requirement within the Framework or the GPDO for developers to select the best feasible siting where a site as proposed is considered to be acceptable” (emphasis added)

5.10 The siting of the proposed development has been as carefully selected as possible. The search area is very specific, and a location was identified which would ensure continued network provision, but which also would not encroach on the other cell sites within the Operators network.

5.11 The area from within which a site will be capable of providing the desired coverage, the “Directed Search Area” (DSA), is determined by network radio planners. For a rooftop installation, the roof must be flat, with clear lines of site and be structurally able to accommodate the heavy equipment. Within the search area, the roof scape is predominately pitched domestic roofs, where there are no suitable alternative buildings or structures to utilise. This DSA covers the urban area surrounding Brunel University, most of the search area comprising of both the University campus and surrounding Student Halls accommodation. Furthermore, much of the Search Area is designated Greenbelt land use.

5.12 There are no comparable structures within the search area that can accommodate the required equipment, necessitating the need for a new ground-based installation. The industrial estate located approximately 270m west of the application site is located outside of the DSA and therefore, this area was discounted on radio planning grounds, as an installation here would not replicate the network coverage due to be lost from Brunel University.

Alternative sites considered and not chosen:

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
Existing Streetworks Site	Masts on Cowley Mill Road, UB8 2QD	505329, 183220	The existing street works mast along Cowley Mill Road, are not structurally capable of withstanding the replacement apparatus and therefore can not be utilised for the proposed equipment.
Greenfield	Hillingdon Golf Club / Course, UB10 0XB	506509, 183213	An option was identified at this location, but subsequently discounted on Radio Planning grounds as it would not provide the necessary coverage to the target area, as it is too far from the existing site.
Streetworks	Turnpike Lane / Hillingdon Road, UB10 0AA	506125, 183126	Potential solutions were identified at these locations, but subsequently discounted on Radio Planning grounds, as they would not provide the necessary coverage to the target area.
Streetworks	Amberley Lane / Hillingdon Road, UB10 0BB	506187, 183036	
Greenfield	Brunel Sports Fields Greenfield, UB8 3PW	506602, 182342	
Streetworks	A408, Cowley Road UB8 2AG	(1) 505352, 182760 (2) 505368, 182752	
Streetworks	Buchan Close / A408, UB8 2NR,	505368, 182549	
Streetworks	Land to the read of Station Road Cowley (Stop BN), UB8 3BB	505444, 182349	
Greenfield	Land south of Nursery Lane, UB8 3NB	506093, 182324	
Rooftop	Student Halls Complex Rooftops, UB8 2TR	505673, 182667	Rooftop options at this location do not satisfy radio planning requirements and a base station on the rooftops of these buildings would not

			provide the necessary coverage to the target area and for this reason, these options were discounted.
Streetworks	Cleveland Road, UB8 2DP	505788, 182766	Options were investigated along Cleveland Road, but subsequently discounted on Radio Planning grounds, as it would not provide the necessary coverage to the target area. Additionally, land options along Cleveland Road are within close proximity to residential properties with characteristically narrow pavements, affording little prospect of supporting mast development.
Rooftop	Brunel University Campus, UB8 3PH	506076, 182630	The existing base station is located upon one of the rooftops of the University Campus. None of the surrounding buildings satisfy radio planning requirements to adequately replace the network coverage due to be lost from the existing site.
Streetworks	High Street / Station Road, Hillingdon, Uxbridge UB8 3AA	505434, 182363	An option was identified at this location, but subsequently discounted on Radio Planning grounds as it would not provide the necessary coverage to the target area. Additionally, there are space restrictions on this road therefore, this option was discounted.

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

N/A

6. Additional relevant information (include planning policy and material considerations):

6.1 The proposed equipment is permitted development subjecting to applying to local planning authority for a determination as to whether the prior approval of the authority will be required as to the siting and appearance of the development.

6.2 In determining an appeal for a telecom's prior approval application, an Inspector clarified that:

*'The permission granted under the GPDO is **equivalent to an outline planning permission** and the Council's considerations of the matter are limited to the effects of the development arising from its **siting or external appearance**, not the principle of the development. Although the site is within the Green Belt, it seems to me, therefore, that there is no scope to consider whether the scheme represents inappropriate development in the Green Belt, or whether very special circumstances need to be demonstrated to justify the granting of approval.'* (Ref. APP/C3430/A/12/2172974)

Environmental Information:

6.3 The application site is not located in an area considered to be environmentally sensitive, or within an identified protected habitat or protected species area. The proposal will subsequently not have any potential negative impacts on any sensitive habitats or species. Furthermore, a check of the Environment Agency website has confirmed the site is not within a Flood Zone area.

Heritage Statement:

6.4 The site is not located on designated, protected land, or designated as areas of special architectural or historic interest whose character and appearance is to be preserved or enhanced. The site is, however, located near to Listed Buildings.

6.5 The site is located approximately 400m from the Greenway Conservation Area and approximately 300m from Cowley Lock Conservation Area. Given the scale of the proposal and the distance from the Conservation Areas, the proposal is unlikely to compromise the setting of these Conservation Areas.

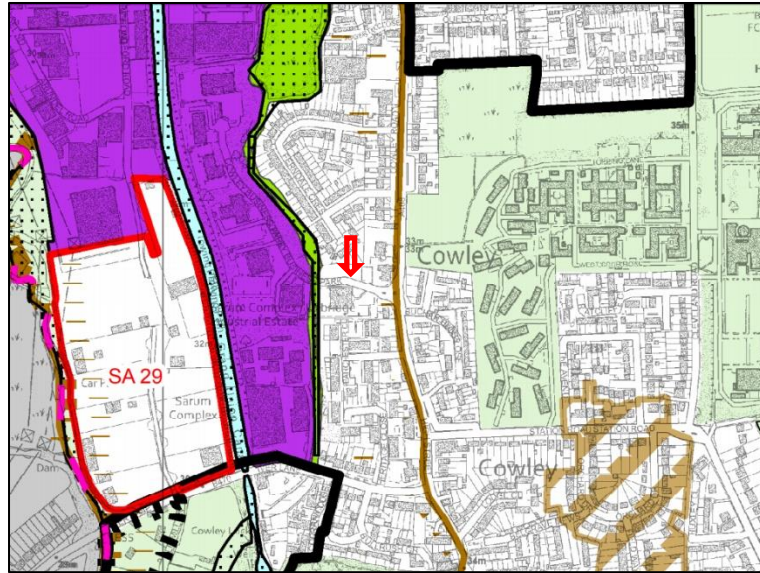


Figure 4. The Greenway Conservation Area and Cowley Lock Conservation Area boundary in relation to application site (denoted with a red arrow)

- 6.6 The nearest Listed Building (Old Vine Cottage) is approximately 42m east of the application site. In considering the development proposal, a key consideration is the balance of preserving heritage assets while also enabling the economic growth and social needs of this area to be suitably served by quality electronic communication services.

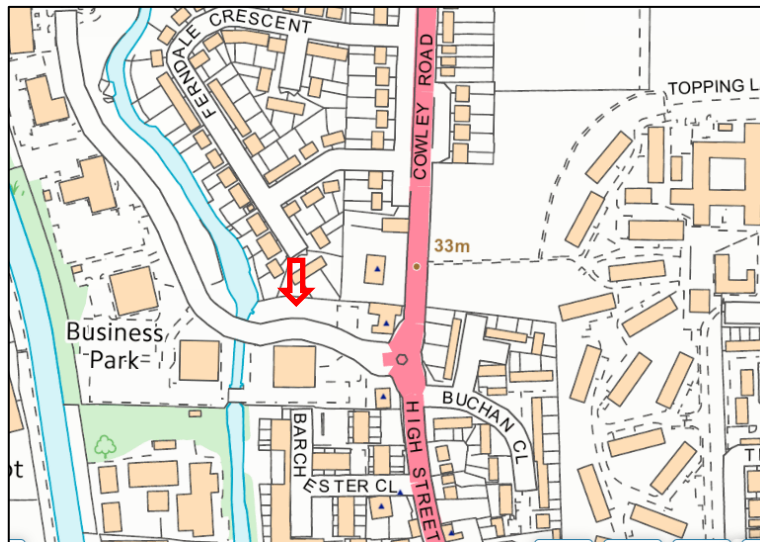


Figure 5. Application site (Red arrow) in relation to Listed Buildings (Blue triangles) Map Source: Historic England

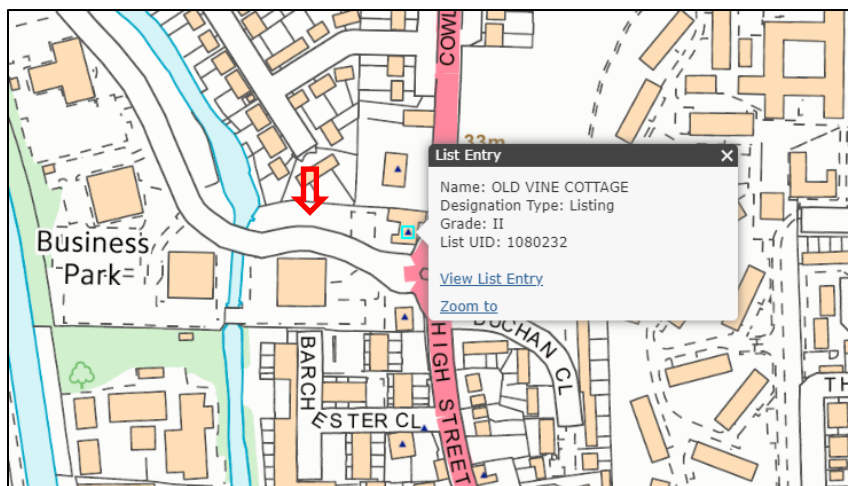


Figure 6. Application site (red arrow) in relation to listed building Old Vine Cottage. Map Source: Historic England.

'Group of buildings ranging in date from late C16 to circa 1700 and with modern additions behind. At left 2 parallel ranges with hipped ends to road merging with roof slope of lower front range parallel to road. Behind at right another range, also parallel to road. Tiled roofs, mostly gable ended with C17 chimneys. Front elevation of C18 brown brick with red brick dressings. Windows all C19 or modern including a large ground floor canted bay and a 1st floor oriel under gable breaking eaves. Pent porch fills angle between front and left ranges and a brick chimney rises through it. Interior considerably restored but there is much original exposed timber some with carpenters' marks, also a barrel vaulted brick cellar of circa 1700. Very picturesque, although jumbled, appearance.'

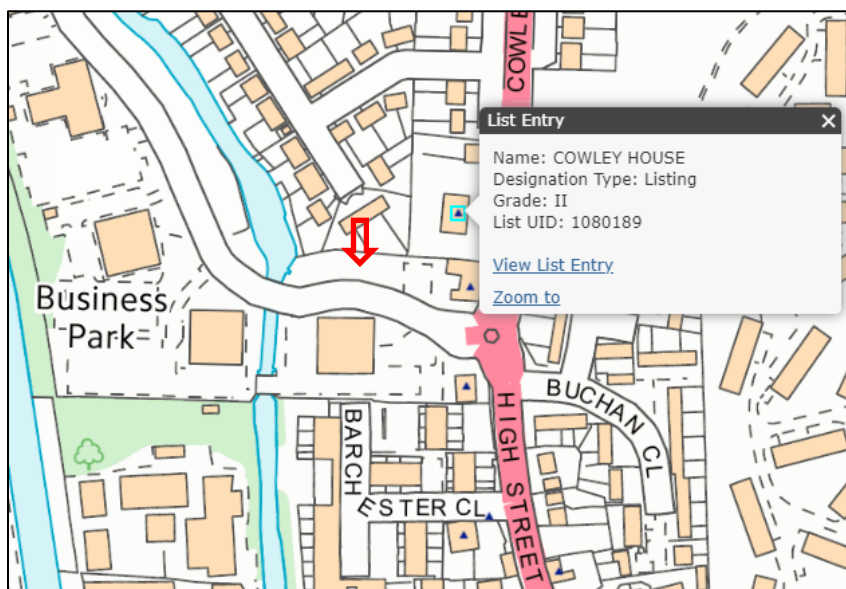


Figure 7. Application site (red arrow) in relation to listed building Cowley House. Map Source: Historic England.

'18 house, altered and enlarged C19., Brown brick with red dressings. 3 storeys, 5:3 double hung sashes with flat arches. Pilasters at angles running through 1st and 2nd storeys. Left hand 2-storey splayed bay; right hand C19 stone porch, cement finished 2nd storey, with parapet. Cornice, modern blue pantiles. Inside, decorations have survived from mid C18. On 1st floor, rooms to north-east and south-east have original panelling; one has a box cornice and the other a chimney piece with marble inserts. Similar chimney-piece and panelling in ground floor south-east room; and in south-west room decorative plasterwork and a later marble fireplace of good quality.'

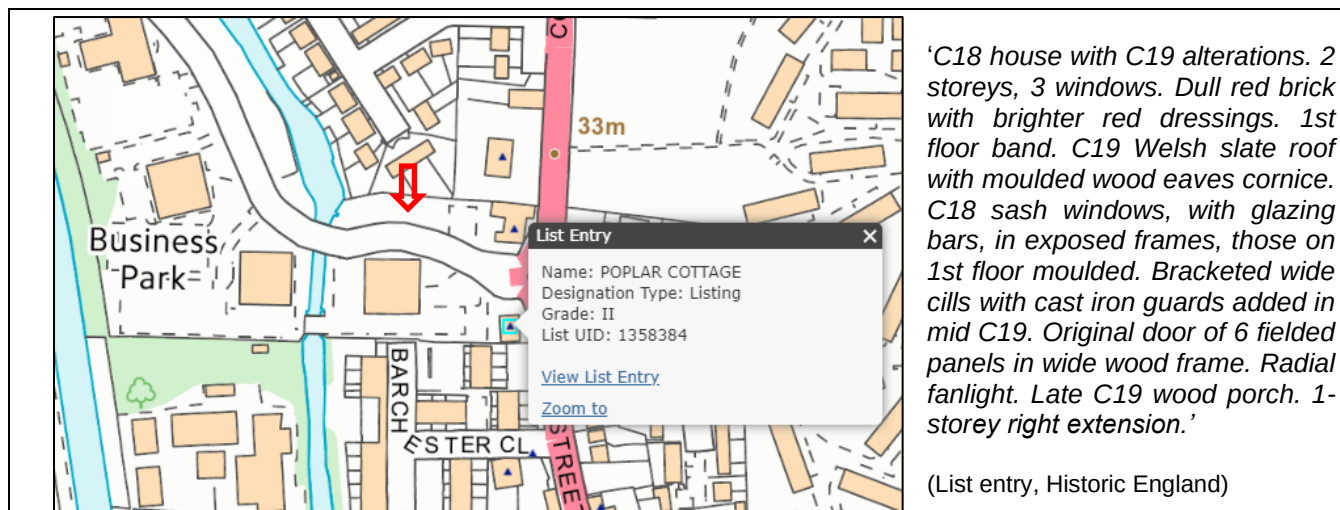


Figure 8. Application site (red arrow) in relation to listed building Poplar Cottage. Map Source: Historic England.

- 6.7 A key principle is that the application site is not within a Conservation Area, nor does it form part of a Listed Building. These designations protect various parts of Uxbridge.
- 6.8 With respect to the setting of the identified listed buildings, the layout, scale and separation distance of the proposed apparatus would ensure that views towards and from the buildings are not greatly affected. The layout of the proposal against a backdrop of a dense tree canopy at 16m in height, would ensure the proposal would not directly impact any of the buildings' features identified in the Historic England list entries.
- 6.9 It could reasonably be concluded that the proposal would lead to "less than substantial harm" (NPPF, para 196) to the setting of the identified heritage assets. This position has been supported for 20m masts located near Conservation Areas and Listed Buildings, as confirmed at appeal for a shared radio base station in Brighton and Hove (Ref: APP/Q1445/W/20/3249294). In allowing the appeal for a 20m mast and radio equipment cabinets for the operators EE & H3G at Courcels, Arundel Street, Brighton, Inspector Davies stated at paragraph 9 and 11 of their decision:

'It would be visible from land within the Conservation Area and the listed buildings [...] amongst other structures, such as the streetlights and other highway impedimenta. The installation would not interrupt key views of the listed buildings or their settings as it would be of a slim profile, positioned some distance away [...]. Its visual impact on the setting of these heritage assets would therefore be minor. The development would lead to less than substantial harm to the significance of the designated heritage assets. This limited harm is outweighed by the benefits that would accrue to improved wireless communications in range of the installation and the wider telecommunications networks.'

- 6.10 As such, and in accordance with the NPPF, the less than substantial harm must be weighed against the public benefits to the surrounding area which are considerable. Refer to Section 4, and proceeding sections of this report outlining national policy, for evidence of public benefits.

Siting and Appearance:

- 6.11 From the outset, it should be appreciated that irrespective of the development's use as a communications site, the installation of a new tall structure will always be, to some degree, a noticeable addition in the local area. However, it should be recognised that visibility or a development's siting and appearance, does not automatically result in an overwhelming adverse harm. In this regard, it is acknowledged that the proposed telecommunications installation would be installed in a non-elevated and well screened location within the target coverage area.
- 6.12 The choice of design at the application site is governed by two main factors; the context and visual amenity of the area; and the technical requirements. As far as practicable the proposed development has been designed to keep to a minimum the impact on residential amenity and the street scene.
- 6.13 The proposed application is for a new ground-based telecommunications installation, and the slimline monopole selected is best suited to areas where there are other vertical structures and mature trees to

provide screening in this urban area. The mast remains mostly uncluttered and slimline in appearance and not overwhelmed with equipment. It is not considered that the equipment housing cabinets cause substantial additional visual impact, nor do they result in visual clutter to warrant a dismissal when balanced against the benefits of the proposal. They do not hinder pedestrian access and are arranged in a neat, linear fashion.

6.14 The distance of the proposed mast from the nearest residential property is approx. 26m. These properties sit at an oblique angle to the application site. The proposal would not result in the loss of sunlight or overshadowing for the nearest residential properties, nor would the proposal result in loss of outlook from any property. The development would not give rise to issues relating to noise and disturbance. The backdrop of the mature trees provides significant screening of the proposal and provides a reasonable visual buffer to the proposal.

6.15 It is well understood by Town Planners there is no entitlement to a view across a third party's land. Planning is carried out in the public interest and it is only when private and public interests coincide can a view across a third party's land, in this case the public highway, which is essentially a private property interest become a material planning consideration. As with views over any adjoining land, that the proposed radio base station may be visible from nearby properties does not equate with harm and cannot normally be regarded as a material planning consideration. It is only when the visual impact of adjoining development, in this case the proposed radio base station, from a principal living room of a nearby property becomes overbearing can it be considered as a material consideration. It is at this point that public and private interests will coincide.

6.16 This is normally most common and easiest to understand in relation to two-storey domestic extensions, where loss of view cannot normally be regarded as a material consideration. In particular a view from a first-floor bedroom window can only in exceptional circumstances be considered material, as it is not a principal living room in which residents would normally sit and relax for long periods. However, in situations where the visual impact of the proposed two-storey extension on the view when seen from the principal living room windows of an adjoining property will appear oppressive, for example, when there is serious overshadowing, loss of daylight and sunlight, or proximity of long lengths of two-storey blank flank wall along the common boundary between two properties, it will become a material consideration such as potentially to support other sustainable reasons for refusing permission for the development.

6.17 This is certainly not the case at the application site. Roadside telecommunications infrastructure has become commonplace, increasingly so as the dependence on mobile technology has risen. A view across a busy main road, of a pole, cannot be said to be in any way overbearing or incongruous and could therefore not be a material planning issue in the determination of this full planning application to upgrade this existing communications site.

6.18 This position was confirmed at appeal for a shared radio base station in Barnet (Ref: APP/Q5300/W/16/3142885). In allowing the appeal for a 20m mast and 4 radio equipment cabinets for the operators Vodafone and O2 at Hadley Wood Station, Inspector Fort stated at paragraph 21 of their decision:

'The proposal may be visible from windows of residential properties. However, due to the separation distances achieved between it and the nearest dwellings and its relatively slim profile at higher level, it could not be said to constitute an overbearing structure that would be unduly harmful to outlook. In terms of the proposal's effects on private views, these are matters that the Courts have held can rarely be instrumental in planning decisions, and as such I only attach very limited weight to these considerations in arriving at my decision'.

6.19 The tower would be galvanised in order to assimilate the structure into the surrounding vertical utilitarian elements with the antennas and dishes coloured grey, as this will reduce the capacity of the antennas to draw the eye when they viewed against the sky. Whilst the proposed colour scheme is considered wholly appropriate for this site, the applicant would be willing to adhere to any colour scheme deemed more appropriate by the local authority and would like the opportunity to discuss this with the local authority during the course of the application process should this be the case.

6.20 The column width is essential in order to fit all technologies within the same structure. **It is the most slimline solution available to provide the required replacement coverage.**

6.21 In considering the impact of the proposal on the street-scene, it is assessed that the development would be visible from only a small number of viewpoint locations. This is because of other vertical structures, trees and the built environment which surround the site, and the proposed development layout. Moreover, it is asserted that the fact the development would be visible from some locations is not a material impact in itself, owing to the sympathetic nature of the development's design. The proposed development will therefore not

appear unduly prominent when viewed from within the immediate vicinity or the wider surrounding area, given its siting, scale and design.

6.22 The Industry Code of Best Practice also acknowledges that the visual impact of a mast can be greatly reduced if it is placed near similar structures such as road signs, lamp posts and commercial premises. The proposed site is located close to several existing lighting columns. Therefore, the installation should merge into the existing street scene and not be viewed as a protruding feature within its setting. As a result, the proposed design fully accords within the NPPF, The Code of Best Practice and the Local Plan.

6.23 Structures, such as that proposed by the Applicant are now largely accepted as being ordinary elements of urban and suburban street scenes and so have increasingly less capacity to draw the eye, particularly in areas surrounded by established vertical elements, such as the Application Site.

6.24 This view is one that has long been supported by the findings of the Planning Inspectorate. As early as 2005, in overturning the decision of Southampton City Council (Ref: APP/D1780/A/04/1162049) to refuse consent for a 15m high monopole and associated equipment housing, the Inspector stated:

“The Council considered that the cumulative impact of the proposed installation would undermine the visual appearance in a location where there is already a proliferation of other “infrastructure components”. I noted that there are various items of street furniture around this road junction, including street lighting, traffic lights, railings and equipment cabinets, and a column supporting a CCTV camera (17m) [...] I do not consider that the mast would appear significantly out of place in this location. Its visual impact on the area and the street scene would not be so harmful as to justify dismissal of the appeal.”

6.25 The installation would provide coverage for two Operators and for multiple technologies. An alternative would be to propose separate installations for the two Operators. A shared development keeps the overall number installations in the area to a minimum.

6.26 The need to respect the character and appearance of the street scene is fully acknowledged and by virtue of the proposal's siting, scale and appearance, this aim is achieved. The degree of visual change in the area would be low. Any change should be weighed against fulfilling the identified need and associated public benefits of the provision of high quality digital mobile connectivity to this commercial and residential area of Uxbridge.

6.27 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 Context:

National Planning Policy Guidance

National Planning Policy Framework (2019) (NPPF)

6.28 The National Planning Policy Framework came into force in July 2018 replacing 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.

6.29 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.”*

6.30 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.”*

6.31 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.”*

6.32 The proposed site will enable the provision of continued reliable 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. The loss of these services, where a wholly suitable option is available to prevent it by allowing for provision of replacement infrastructure, goes against the aims of the Government as expressed within the NPPF.

6.33 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.”

6.34 When determining planning applications that affect heritage assets, the NPPF advises that local authorities should take account of:

*‘a) the desirability of sustaining and enhancing the significance of heritage assets and **putting them to viable uses consistent with their conservation**;*

*b) the positive contribution that conservation of heritage assets can make to sustainable communities including their **economic vitality**...’ (para. 192)*

*‘Where a development proposal will lead to **less than substantial harm** to the significance of a designated heritage asset, this harm should be weighed against the **public benefits of the proposal** including, where appropriate, **securing its optimum viable use**.’ (para. 196)*

*‘**Not all elements of a Conservation Area** or World Heritage Site will necessarily contribute to its significance.’ (para. 201)*

- 6.35 The NPPF 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)"*
- 6.36 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"*.
- 6.37 While supported, the number of base stations is 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"*.
- 6.38 By providing coverage for two Operators from a single installation the proposal is in line with the above policy.
- 6.39 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"*.
- 6.40 It is acknowledged that the proposal would result in some harm to the visual amenity of the surrounding area however, this harm on balance, would be outweighed by the economic and social benefits that would stem from the proposal.
- 6.41 The NPPF is clear that that harm should be weighed against the public benefits of the proposal. It is stated in section 4 of this statement that the Planning Inspectorate has in recent years continually recognised the importance of connectivity. When applying the balancing exercise, the Inspectorate has found in multiple cases that the provision, or prevention of loss to existing services can outweigh less than substantial harm to visual amenity.
- 6.42 In determining one such appeal in March 2020, brought MBNL (EE & H3G) against Birmingham City Council to refuse planning permission for the installation of a 20 metre high monopole accompanied by equipment cabinets on a roadside verge in a residential area of Birmingham (Ref: APP/P4605/W/19/32417919), the Inspector concluded that:
- "In this case, the proposed development would result in harm to the visual amenity of the area, with particular regard to the proposal's scale and siting. As such, conflict would arise with Policy PG3 of the Birmingham Development Plan insofar as the development would not reinforce local distinctiveness with a design that responds to site's conditions and the context of the local area. However, I conclude that this harm would, on balance, be outweighed by the economic and social benefits that would stem from the proposed upgrade which would not be realised whilst reducing the height of the mast. Therefore, in the round, the proposal would accord with saved UDP Policies 8.55 and 8.55A-C, the SPD and Framework paragraphs 112 and 113. Collectively, these seek to support the expansion of shared next generation mobile technology to create a modern, high quality and reliable communications infrastructure that is essential for economic growth and the life of the local community."*
- 6.43 This Inspector of this appeal also found that the cabinets would be perceived as part of the functional structures commonly found within highways and so would not appear out of place.
- 6.44 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.

UK Digital Strategy



Policy paper

UK Digital Strategy 2017

Published 1 March 2017

6.45 The UK Digital Strategy, published by the Department for Digital, Culture, Media & Sport in March 2017, provides evidence of the public benefits of communication services:

'Broadband and mobile must be treated as the fourth utility, with everyone benefiting from improved connectivity. This will play a crucial role in ensuring that everyone, wherever they live and however they connect, can make full use of digital services and benefit from participation in the digital economy. Improved connectivity also increases innovation and productivity across the economy, bringing significant economic rewards'

'5G is the next generation of mobile connectivity, and is currently in development. It is expected to represent a significant upgrade: providing ultrafast, low latency, and more reliable mobile connectivity, able to handle our ever-increasing data requirements. This should present huge opportunities to boost productivity and grow the economy. In addition to giving consumers and business users high quality connectivity, it will also support the development of the Internet of Things: the rapidly-increasing number of connected devices, from connected cars to digital health applications.'

Future Telecoms Infrastructure Review



FUTURE TELECOMS INFRASTRUCTURE REVIEW



6.46 The Department for Digital, Culture, Media & Sport published its findings of the Government's Future Telecoms Infrastructure Review in 2018. The review highlights the important and far reaching role of 5G infrastructure:

'Alongside finishing the roll out of 4G networks to meet existing mobile demand, we want the UK to be a world leader in 5G to take early advantage of this new technology. We have set a target that the majority of the population will have 5G coverage by 2027.'

'The technical capabilities and performance characteristics of 5G are clear. 5G is expected to deliver faster and better mobile broadband services to consumers and businesses, and to enable innovative new services for industry sectors, including manufacturing, transport, immersive technologies and healthcare.'

(p 10)



6.47 Ofcom's annual Communications Market Reports identified trends which demonstrate reliance on reliable mobile connections:

Communications Market Report 2019

*'We all need high-quality communications. In the modern world, a huge amount of our time is spent using communications services: for work, to stay in touch with family and friends, and in order to go about our daily lives. **Our ability to access and use reliable mobile and broadband connections has become fundamental to the way we work and live, and to the ability of businesses of all sizes to thrive.** For many people, internet connectivity is now as essential as gas or electricity, and access to traditional television, radio, fixed phone lines and postal services continue to remain important.'*
(2016 report)

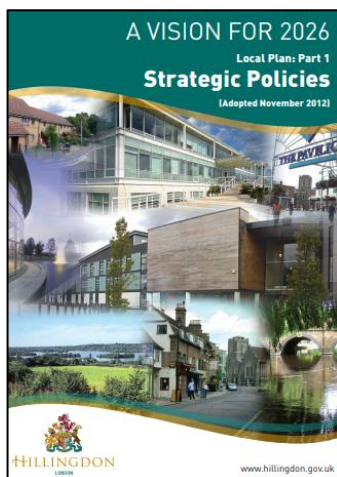
Development Plan Policy:

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

6.49 For the purposes of Section 70, the current adopted development plan for London Hillingdon Council, relevant to the proposal comprises:

- The Local Plan: Part 1 - Strategic Policies (2012)
- The Local Plan: Part 2 - Development Management Policies (2020)
- The London Plan (2016)

The Local Plan: Part 1 - Strategic Policies (2012)



I POLICY BE1: BUILT ENVIRONMENT

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

I POLICY DMHB 21: TELECOMMUNICATIONS

'Telecommunication development will only be permitted where:

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

I POLICY DMHB 1: HERITAGE ASSETS

'A) The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:

- i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;*
- ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;*
- iii) it makes a positive contribution to the local character and distinctiveness of the area;*
- iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;*
- v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;*
- vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and*
- vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.*

B) Development proposals affecting designated heritage assets need to take account of the effects of climate change and renewable energy without impacting negatively on the heritage asset. The Council may require an alternative solution which will protect the asset yet meet the sustainability objectives of the Local Plan.

C) The Council will seek to secure the repair and reuse of Listed Buildings and monuments and improvements to Conservation Areas on the Heritage at Risk Register, through negotiations with owners, the provision of advice and guidance, the use of appropriate legal action, and through bids for external funding for improvement works.



THE LONDON PLAN
THE SPATIAL DEVELOPMENT STRATEGY FOR LONDON
CONSOLIDATED WITH ALTERATIONS SINCE 2011

I ENSURING THE INFRASTRUCTURE TO SUPPORT GROWTH

*'What has been said here about energy and water highlights the importance of ensuring London has physical infrastructure adequate for the needs of a growing city, meeting the highest and most modern standards to help us use the city's resources as efficiently and sustainably as possible. **It will be important for the whole range of utility providers to work together and with the capital's government to make sure London has the infrastructure it needs, in the places it is needed whether this is the network of substations and power lines distributing electricity, the network of water or gas mains or the wires and fibre optic cables that facilitate the flow of information increasingly important***' (Para. 1.38)

I POLICY 4.11 ENCOURAGING A CONNECTED ECONOMY

'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***

*'Successful service-based economies like London increasingly **depend upon infrastructure facilitating rapid transfer of information**, speedy and easy access to advice and services and a flexible approach to where work takes place and when.'*

*'This can also help deliver wider planning objectives, such as **reducing congestion** on traffic networks at peak hours by **supporting forms of home working** and facilitating greater **economic development in outer London**. Increasingly, this will mean looking to the infrastructure needed to support 'ubiquitous networks' – those supporting use of a range of devices to access ICT services beyond desk based personal computers, and the Mayor will examine the planning issues these might raise.'*

*'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**. He will work with infrastructure providers, developers and other stakeholders 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, especially among disadvantaged groups and small and medium sized enterprises. In particular, he will **support the development and extension of high speed connectivity**...' (Para 4.57)*

Other Material Considerations

6.50 The following are examples of appeal decisions by the Planning Inspectorate where the Inspector awarded considerable weight to the public need for communications infrastructure, with respect to maintaining and improving network coverage/capacity. The proposal at the application site is required in order to meet the same objectives.

6.51 The two cases below relate to installation of ground-based masts within conservation areas, sited near to listed buildings. The application proposal is for building-based apparatus that would not be within a conservation area and not in the immediate setting of listed buildings, making the proposal sequentially preferable over the cases listed. These factors provide greater weight in favour of approval. The following appeals were all allowed.

1) APP/Q3305/W/18/3206555 – Vodafone Vs. Mendip District Council

'In considering the need for the proposal, Government policy, as set out in the Framework states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. In this respect, I have found that there is a need for the proposal which therefore weighs strongly in its favour.... I conclude on this issue that despite the less than substantial harm that would be caused, the public benefits of the proposal would outweigh that harm.'

2) APP/M5450/W/17/3180345 - CTIL and Telefónica (O2) Vs. the London Borough of Hillingdon

'The Framework sets out the importance of an advanced high quality communications infrastructure for sustainable growth and makes specific reference to the development of high speed broadband technology. This is reflected in the London Plan and the public benefit arising from the improvement of the telecommunications infrastructure is a material planning consideration that weighs in favour of the proposal.'

*Taking account of all matters I have concluded that **the limited harm caused to the significance of the heritage asset (the CA) would be outweighed by the public benefit** that would arise from improving the communications infrastructure'.*

Summary

6.52 The application seeks the authority's approval for the siting and appearance of proposed communications equipment to be installed at Cowley Business Park. The principle aim of the proposal is to replace an existing base station that is due to be removed from the network, due to circumstances beyond the operators control.

6.53 The equipment layout and design are based on the principle of meeting operational requirements of the mobile operators, whilst minimising landscape and visual impact as far as technical constraints allow. The Operators EE and Three would share the site, thereby minimising the number of structures required and associated sites.

6.1 Modern communication services have evident social, economic and environmental implications. This includes the mobile's role in providing social and digital inclusion to communities; economic competitiveness by serving businesses in the area; and supporting sustainability objectives such as enabling homeworking, reducing transport congestion and greenhouse gas emissions. National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for a continued and improved quality of service.

6.54 It is concluded that the proposal would lead to "less than substantial harm" (NPPF, para 196) to heritage assets and as such, in accordance with the NPPF, the less than substantial harm must be weighed against the public benefits to the surrounding area which are considerable.

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