

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Church Road SW	Site Address:	Church Road, Hayes, Middlesex, UB3 2LN
National Grid Reference:	509733/180818		
Site Ref Number:	234317	Site Type: ¹	Macro - Streetworks

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?		No
If no explain why: Hillingdon does not have a mast register; however telecoms site history in the area was investigated.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: n/a		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	4 th December 2018
Name of contact:	n/a
Summary of outcome/Main issues raised: A letter was sent to the Local Planning Authority on 4 th December 2018. No response was received.	

¹ Macro or Micro

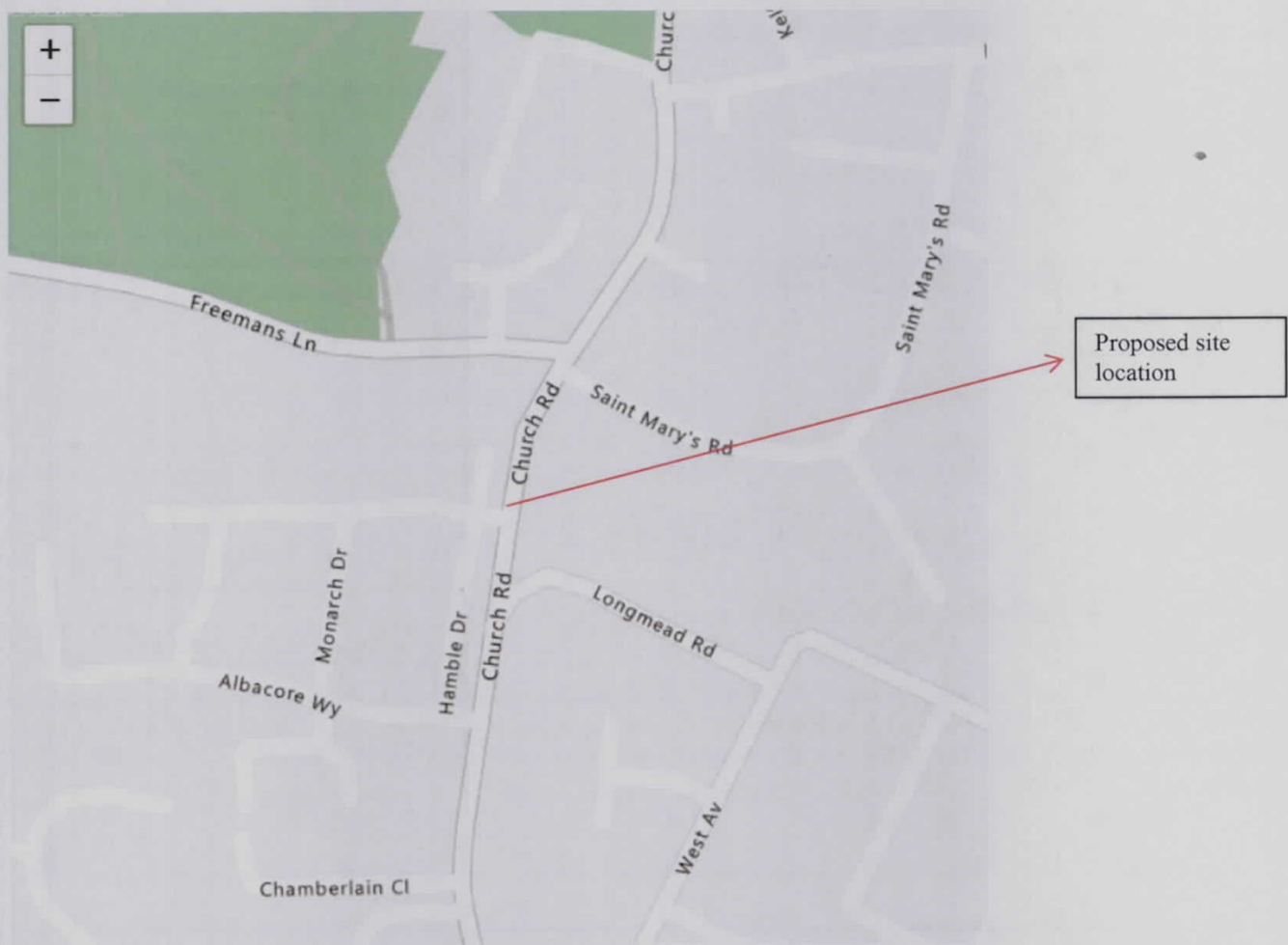
Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: Letters were sent to Councillors Peter Curling, Lynne Allen and Robin Sansarpuri, and John Martin McDonnell MP, on 4 th December 2018.			
Summary of outcome/main issues raised (include copies of relevant correspondence): No responses were received. If any responses are received after the submission of this application, they will be forwarded to the Local Planning Authority.			

School/College

Location of site in relation to school/college (include name of school/college):

The Government School Check website was used and shows that there are no schools within 250 metres of the proposed site.



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?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: N/A – no aerodromes or airfields within 3km of the proposed site.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	14 th January 2019	

3. Proposed Development

The proposed site:

The proposed equipment will be located on a small grass verge and public footpath on Church Road, close to the junction with Fremantle Way. The surrounding area is predominantly residential, with Hayes Town Chapel located on the opposite side of the road.

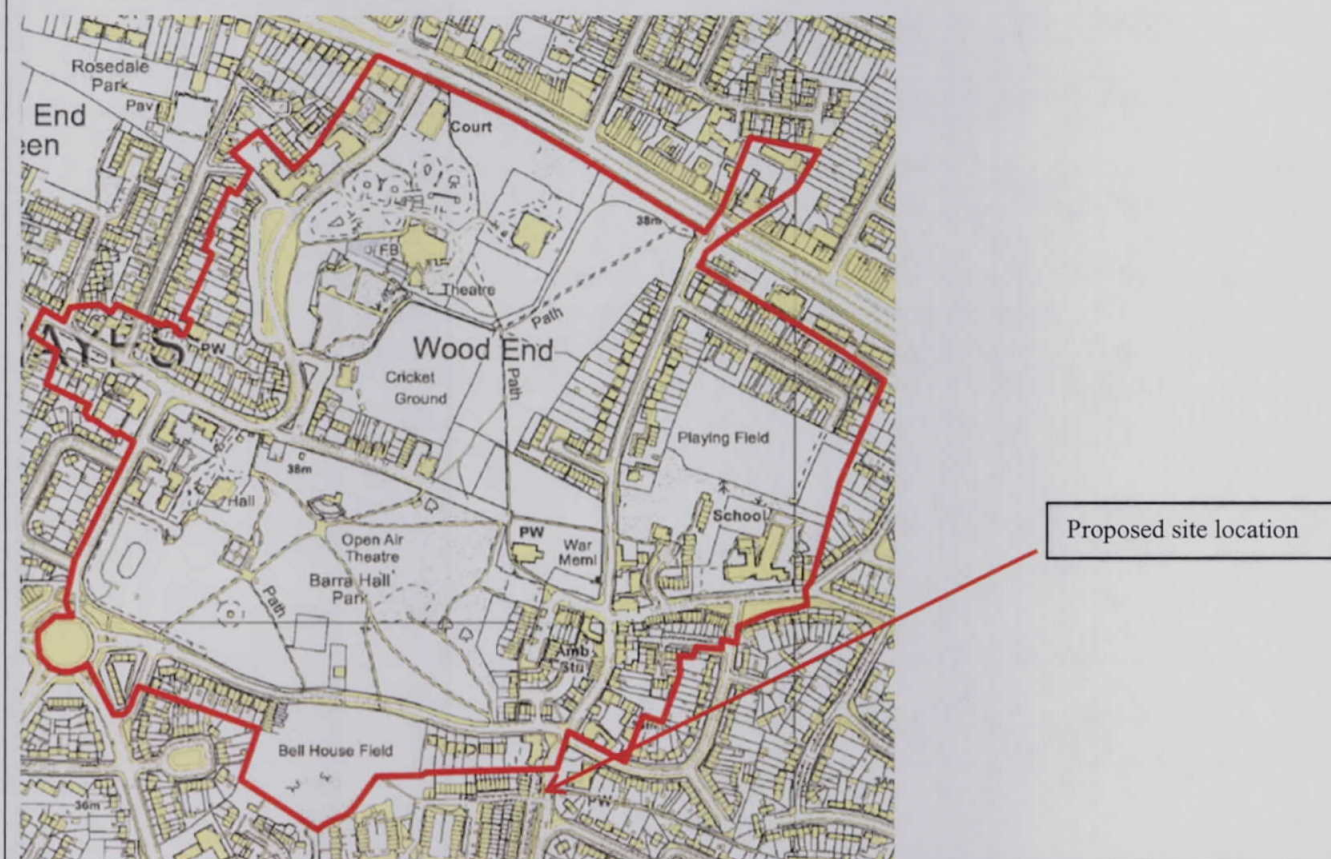
View of the proposed site location looking North on Church Road



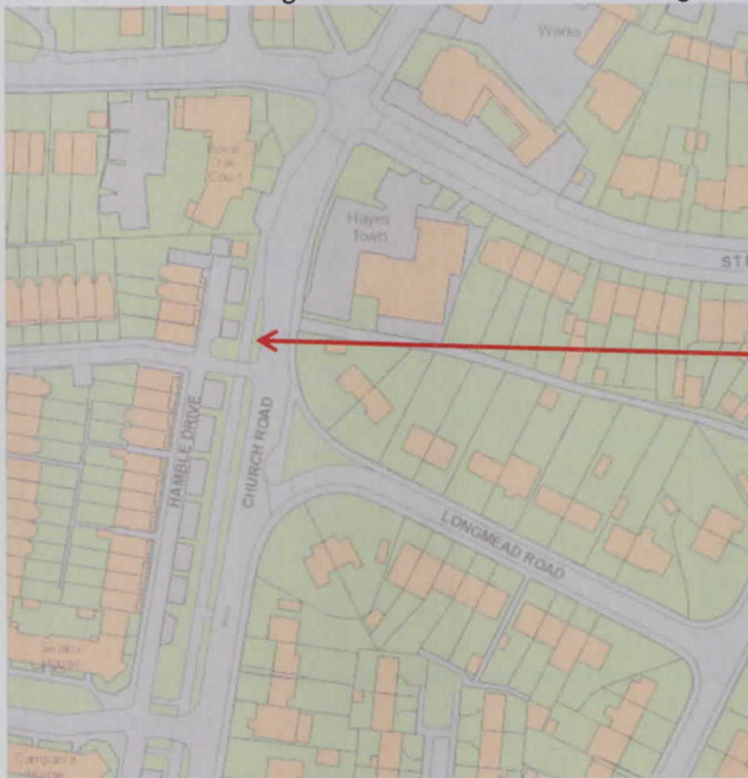
View of the proposed site location looking South on Church Road



The site is located close to the boundary of Hayes Village Conservation Area but does not sit within it. The map below shows the proposed site location and the Conservation Area boundary, taken from the Hayes Village Conservation Area Appraisal.



There are no listed buildings in close proximity to the site, as shown on the below map taken from the Historic England website. Listed buildings are depicted by a small blue triangle.



This location has been identified as it is within an area that requires enhanced capacity and coverage due to the massive demand placed on existing base stations by the increased number of users of smart phones and tablets.

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

Please see the enclosed Supporting Technical Information document which shows coverage with and without the proposed site at Church Road.

Optimum levels of coverage are depicted by the pink colour (Indoor Dense Urban coverage level). Currently the immediate area only has Indoor Suburban (blue) and Indoor Urban (orange) coverage. The installation of this site on Church Road ensures that the area will achieve predominantly optimum Indoor Dense Urban coverage (pink).

Type of Structure (e.g. tower, mast, etc):	
Description: "The installation of a 15 metre high Elara monopole." Proposed cabinets do not form part of this application and will be installed under Permitted Development Rights at a later stage. This application is for the installation of the monopole only.	
Overall Height:	15 metres
Height of existing building (where applicable):	N/A
Equipment Housing:	
Length:	n/a
Width:	n/a
Height:	n/a
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel – RAL6009 Fir Green
Equipment housing – type of material and external colour:	n/a

Reasons for choice of design, making reference to pre-application responses:
There were no pre-application responses received. The equipment has been kept to the lowest height possible (15 metres above ground level) to achieve the required levels of coverage. The proposed antennas must sit above the height of surrounding buildings and trees to achieve the optimum coverage levels shown in the enclosed coverage plots. The enclosed Panoramic Aerial Photographs show that an antenna height of 17 metres would be optimum to allow the coverage to reach over the tall trees to the south. However, due to the residential nature of the area, the operator has been willing to compromise to reduce the height of the proposed monopole to 15 metres. A lower height would not allow the coverage to extend over surrounding buildings and trees, as demonstrated by the photos at a height of 12.5 metres Additionally, the least amount of equipment possible is proposed. This application is for the installation of the monopole only. The monopole has been carefully located to ensure that it is not directly outside main aspect windows of nearby properties. The monopole will be located on a grass verge to ensure that it does not impede pedestrian flow. There are similar vertical elements in the vicinity in the form of lighting columns. Other sites in the search area were investigated but were unable to be utilised. More information on alternative sites can be found in Section 5 of this document.

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

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

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 site is required to enhance coverage and capacity in the surrounding area, as demonstrated by the coverage plots included as part of this application.

Optimum levels of coverage are depicted by the pink colour (Indoor Dense Urban coverage level). Currently the immediate area only has Indoor Suburban (blue) and Indoor Urban (orange) coverage. The installation of this site on Church Road ensures that the area will achieve predominantly optimum Indoor Dense Urban coverage (pink).

5. Site Selection Process

Alternative sites considered and not chosen

The number of alternative sites is reduced as the entire central and southern part of the search area is a housing estate with pavements too narrow to accept a SW site. To the NE and NW are two existing TEF sites which discounted those areas due to the possibility of interference. The only sensible options were along Church Road simply because there was sufficient space.

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
Streetworks	Kerstin Close/St Mary's Road SW, St Mary's Road, Hayes, UB3 2JG	E509915/N180991	The site is located within Hayes Village conservation area. The site was discounted as it was very close to residential properties. Additionally there was not adequate space to position a cabinet.
Rooftop	Uxbridge College School of Dance, College Way, Coldharbour Lane, Hayes	E510263/N180841	The flat roof could possibly house antennas but there are pitched roofs to the north and west. This would mean that we would require at least a 7 metre high stub mast to be above the pitched roof and to provide the required levels of coverage. The building is brand new and a dance hall. It would be difficult to find a design which would be acceptable in planning terms.
Streetworks	Junction of St Mary's Road and Hemmen Lane, Hayes, UB3 2JQ	E509962/N181014	Discounted due to overhead BT wires which would not allow for the required monopole height.
Streetworks	Corner of Freemans Lane and Church Road, Hayes	E509746/N180907	Within Hayes Village Conservation Area and within 50 metres of a grade II listed building. Discounted in favour of the chosen site which is not located close to a listed building or within the CA.
Rooftop	Hughendon Court, Chamberlain Close, Hayes, UB3 2GD	E509632/N180656	Too far to South of search area to provide adequate coverage. Additionally, roof not adequate to host telecommunications equipment due to structural issues.

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

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

- Located close to Hayes Village Conservation Area

Land use planning designations:

- Archaeological Priority Area – Hillingdon Unitary Development Plan Proposals Map

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

The London Borough of Hillingdon Local Plan Part One was adopted in November 2012. It contains the following policy which is relevant in the determination of this application.

Policy HE1 – Heritage

In relation to Policy HE1, the site is located outside of the Hayes Village Conservation Area but will be visible from within it. The equipment has been sited to have the least amount of impact on the Conservation Area as possible, in terms of its location close to similar vertical elements on the streetscene and the painting of the equipment in RAL6009 Fir Green which will aid in ameliorating its presence. This will aid in conserving Hillingdon's distinct and varied environment, settings and the wider historic landscape. The proposal will not result in the loss of a heritage asset.

The London Borough of Hillingdon Unitary Development Plan (UPD) was adopted in 1998, with some policies 'saved' beyond September 2007. The following policies have been saved and are relevant in the determination of this application.

Policy BE4 – Conservation Areas

Policy BE37 – Telecommunications

In relation to Policy BE4, the site is located a small distance away from the boundary of the Hayes Village Conservation Area. It is not considered that the proposal will cause damage to the heritage of the area as it does not propose demolition of any heritage assets and will not affect the special architectural and visual qualities of the area.

In relation to Policy BE37:

- i) The need for the development is demonstrated by the enclosed coverage plots.
- ii) Alternative sites have been provided and show that the only feasible option is the chosen location at Church Road.
- iii) There are no existing telecommunications sites in the search area and therefore an existing facility cannot be utilised. The nearest existing sites are outside of the search area on Uxbridge Road (A4020) and on the roundabout at the opposite end of Freemans Lane.
- iv) Due to the highly residential nature of the area, there are limited buildings that would be suitable to host a telecommunications site. The closest suitable building is the Uxbridge College School of Dance which has been discounted as previously mentioned in Section 5 of this document.
- v) The visual impact of the site has been minimised so far as practicable to ensure that the appearance of the townscape and landscape are not seriously harmed. The proposal is for the installation of a monopole, which are commonly found in similar streetscenes. The equipment will be painted RAL6009 Fir Green to aid in

ameliorating its presence and there are existing vertical elements in close proximity to the site, in the form of street lights.

London Plan

The current 2016 Plan is still the adopted Development Plan, but the Draft London Plan is considered to be a material consideration in planning decisions and holds limited weight in the determination of applications.

The 2016 Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks that London requires to secure its long – term economic growth.

The Draft London Plan contains Paragraph 1.0.8 which states “Planning for a ‘smarter’ city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners.” The equipment provides digital connectivity which is of a public benefit to both Londoners and visitors to the area.

Paragraph 1.4.11 states “The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processed, opening up new markets and allowing more flexible working.” The new site will ensure that the level of connectivity in the area is sufficient to meet the rising demand of reliable data and digital services by the public.

Policy SI6 – Digital connectivity infrastructure is split into 4 parts. In relation to the proposed installation:

3A) The site will ensure that there will be no reduction in mobile connectivity in the surrounding area as the existing level of coverage will be improved, as demonstrated in the enclosed coverage plots.

4) The proposal supports the effective use of street furniture to accommodate well-designed mobile digital infrastructure.

The site will be an integral element in securing the Mayor’s vision for the delivery of modern communications networks across London.

London Infrastructure Plan 2050 – Update

Chapter 8 – Digital connectivity states that digital connectivity is vital and essential for businesses and citizens to take part in modern society. The installation of the site will allow for a sufficient level of connectivity to be continued within the area, thus keeping businesses and citizens at a technological advantage.

National Infrastructure Commission Report – Connected Future

The National Infrastructure Commission (NIC) was asked to advise government on the steps the UK should take in order to become a world leader in the deployment of 5G mobile telecommunications networks, and ensure that the UK can take early advantage of the applications those networks may enable.

The Commission’s central finding is that mobile connectivity has become a necessity. The market has driven great advances since the advent of the mobile phone, but Government

must now play an active role to ensure that basic services are available wherever we live, work and travel, whilst our roads, railways and city centres must be made 5G ready as quickly as possible.

Recommendation 4 states:

"Local Government should actively facilitate the deployment of mobile telecoms infrastructure." This proposal enhances Telefónica UK Ltd's mobile network and is required to provide mobile coverage and connectivity in this busy residential area.

Paragraph 3.4 states:

"These issues need to be addressed to enable widespread provision and adoption of various future services in the UK, with high quality mobile access where people live, work and travel. Addressing coverage issues now will provide the infrastructure platform on which successive generations of mobile technology will sit, be they 5G, 6G or next generation Wi-Fi."

This site is an import part of this ethos and will provide good mobile coverage where people live, work and travel.

National Planning Policy Framework

This legislation was formally adopted in July 2018 and replaces the previous version which was introduced in 2012.

In relation to this policy the following sections are relevant in determining this application:

Section 6 – Building a strong, competitive economy

Section 10 – Supporting high quality communications

Section 12 – Achieving well-designed places

Section 16 – Conserving and enhancing the historic environment

The following paragraphs need to be considered in relation to this policy:

Paragraph 80 – "significant weight should be placed on the need to support economic growth and productivity... this is particularly important where Britain can be a global leader in driving innovation."

Paragraph 112 – "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. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution)"

This site is required to provide improved coverage in the area. The site is in compliance with national and local policy and ensures the continued provision of high quality digital infrastructure in this busy locality.

Paragraph 113 – "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....., use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged.”

In relation to this paragraph, a number of alternative sites have been considered and a new streetworks option in this location was the only viable solution. Most of the search area fell within the Conservation Area and therefore it was preferable from a planning view to pursue an option outside of the Conservation Area. There are no existing masts in the search area that can be utilised.

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

- a) They have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and
- b) They have considered the possibility of the construction of new buildings or other structure interfering with broadcast and electronic communications services.”

Paragraph 115 – “Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- a) The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and
- b) For an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or
- c) For a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

In relation to this paragraph, there are no schools close to the site and both Heathrow Airport and RAF Northolt are located more than 3km away from the site. An ICNIRP certificate is submitted with the application confirming that the site will not exceed International Commission guidelines on non-ionising radiation protection. Discounted alternative sites are provided in Section 5 of this document.

Paragraph 124 – “Good design is a key aspect of sustainable development creates better places in which to live and work and helps make development acceptable to communities.”

In relation to this paragraph, the monopole has been kept as slimline and to the lowest height as possible to provide the required levels of coverage to the area. The site is not located directly outside any main aspect windows of nearby properties and the equipment will be painted RAL6009 to aid in ameliorating its presence.

The public benefit of mobile connectivity is apparent in our everyday lives. Connecting to the Internet via a mobile device allows people to access a wide range of central and local government services; to do research for a school project; to manage their bank account and pay bills etc. Good mobile connectivity is also vital to the business sector and can entice businesses into an area. The new site ensures that there is good mobile connectivity in the area and complies with National and Local Policy; therefore permission should not be withheld.

We confirm that the submitted drawings have been checked for accuracy.

Name: (Agent)	Victoria Parsons – Avison Young	Telephone:	0161 956 4123
Operator:	CTIL - Telefónica		
Address:	Norfolk House, 7 Norfolk Street, Manchester, M2 1DW	Email Address:	Victoria.parsons@avisonyoung.com
Signed:	<i>V. Parsons</i>	Date:	11th February 2019
Position:	Planner - Telecoms	Company:	Avison Young
		(on behalf of CTIL and Telefónica)	