

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Uxbridge Road	Site Address:	Colleridge Way
National Grid Reference:	E: 510176 N: 181257		Uxbridge Road
			Hayes
			London
			Hillingdon
			UB4 0RY
Site Ref:	HGN041/70561	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	
Were industry site databases checked for suitable sites by the operator:	Yes	

Annual Area Wide Information to local planning authority

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

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	07/06/2019 for first proposal
Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	
Summary of outcome/Main issues raised:	
As this is the second proposal for this site and with no responses received to pre-consultation of the original application, further consultation has not been progressed	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Amber
---	-------

The site was rated as amber due to its proximity to residential dwellings. Pre-application consultation letters were sent to the following people on 7th June 2019;

Councillor Lynne Allen
Councillor Peter Curling
Councillor Raju Sansarpuri
John McDonnell MP

No response received to date.

School/College

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

No schools within the immediate area.

Outline of consultation carried out with school/college (*include evidence of consultation*):

N/A

Summary of outcome/Main issues raised:

N/A

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

Will the structure be within 3km of an aerodrome or airfield?		N/A
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		N/A
Details of response:		
N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	YES
Date served:	23/04/2020

3.0 Proposed Development

The proposed site:

The site is located adjacent to Uxbridge Road, A4020. Some 573m due West of the site, is The Beck Theatre, adjacent to Hayes Cricket Club. Situated approx. 667m to the East of the site lies Lombardy Retail Park, backing onto the A312. Beyond the A312, Hayes Bridge Retail Park, accommodating for a number of large commercial buildings.

As a result of the current COVID-19 pandemic, sites such as this, covering wider residential areas, are now contributing to an unprecedented demand on the existing network. Therefore, this prior approval application will retain the existing mast and equipment and add a new monopole and equipment, rather than replacing the existing structures.

The huge increase in people working from home (with this being unlikely to end immediately after restrictions are lifted) has challenged the existing network capacity. Furthermore, EE has dedicated its entire 4G network to the emergency services. This means that sites like these have suddenly become essential in being able to support the rapidly increasing demand on the network. It is no longer designated commercial areas where network demand is peak. With many people working from home, demand has spread. In line with Government advice, it is important, where appropriate, to support applications which will upgrade the network capacity in these unprecedented times. This is in order to minimise societal and economic damage.

To the North West of the site runs Hayes Highstreet, spanning along Uxbridge Road. Being located along the A4020, there is a number of existing vertical features within the immediate area, these include; associated road signage, CCTV units, speed camera units, traffic lights, mature trees and street lighting columns. All of which, the mast will be seen in conjunction with. This section of road is of high activity, with motorists and shoppers utilising the nearby facilities.

The South of the site, is of a residential nature, accommodating for a block of high-rise flats, mid-level flats and terrace houses. Between which, green space and tree cover. The nearest residential dwellings are the block of low-level flats, some 10m South from the proposed site location. Whilst these dwellings are within close proximity, they do not look directly upon the site, views of the mast will be of an oblique angle and the new site location will provide a reduced view, in comparison with the current site location. Properties to the North of the site, above the Highstreet shops will be subject to direct views, some 40m Northbound, beyond the A4020. Whilst there will be some visual impact, it is contended that the character and appearance of the area will not be unacceptably harmed.

The site is not located within any specific planning designations; however, Hayes Village Conservation Area is located 100m South East of the site. The nearest listed building, is the locally listed Mecca Bingo Club, formerly The Savoy Cinema. Due to existing buildings between the allocations, there will be no undue harm caused to the amenity of the area. The surrounding area is a mix of housing and shops, both the housing and shopfronts adjacent to the site lack any aesthetic merit.

Following the COVID-19 pandemic, it is imperative that telecommunications is not only maintained but also upgraded to ensure capacity and real time data is at the forefront.

Telecommunications is considered as a critical service as it provides data to network operatives, field engineers, call centre staff, IT and data infrastructure, 999 and 111 staff. This upgrade will allow telecommunications infrastructure providers (EE/H3G) to assure quality, capacity and operational performance so that customers have uninterrupted access to crucial mobile and broadband services at this critical time. The operator EE has dedicated its entire 4G network to the emergency services, meaning it is crucial that 2G and 3G networks are fully supported by an adequate number of sites.

Full consideration has been given to alternative sites and other existing masts in the vicinity. However, the proposed location and design are considered to provide the optimum solution.

It is noted that the recent planning application was refused due to the visual impact of the monopole. However, the proposed location would have the least possible impact on the residential dwellings in the area. Since the previous planning application was refused, government guidance has changed. The Government-issued COVID-19 guidance (released 2 April 2020) stating... *'Now, more than ever, the country is reliant on fixed line and mobile communications networks. Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak.'*

A second reason for refusal was the absence of a tree survey and arboriculturally impact assessment, thus the application failed to demonstrate that the development would safeguard existing trees both in the short and long-term. As part of this application, an arboriculturally impact assessment has been submitted. This report concludes that, *'The proposed location of monopole and cabinets are well away from the canopies and Root Protection Areas of all adjacent trees so there is most unlikely to be any impact on adjacent trees.* Therefore, it is suggested that this reason for refusal has now been overcome and is no longer relevant to this application.

As the country faces this crisis, demand has shifted to different locations and there is a far greater demand and thus requirement for increased capacity. It is highly likely the population will work in this manner well beyond when any restrictions are lifted. Consequently, the capacity now and in the future requires a second pole rather than a replacement. In this instance the proposed mast would form part of a network upgrade – ensuring that capacity and reliability is increased. This is an urgent and essential task with regards to new demands on the networks following the current COVID-19 pandemic.

Site notices notifying the public of the proposal have been put in place during the survey stage of site identification.

View of existing mast from the South, along Uxbridge Road.



View of existing mast from the West, along Uxbridge Road.



View of existing mast from the East, along Uxbridge Road.



Planning History

74909/APP/2019/2104 - Removal of existing 11.7m high monopole, 3 antennas and 3 equipment cabinets and installation of 20m monopole, 12 antenna apertures and 9 equipment cabinets.

Refused – 5.9.19

Current Telecommunications Use/ The Future

Since the date of the above decisions, mobile operator networks have been under increased pressure to provide up-to-date telecommunications functionality, as mobile phones and mobile broadband use have become increasingly essential to our daily lives. 5G is the next generation of technology to enable increased connectivity with increased data speeds.

With the recent unprecedented increase in people working from home, it is essential to provide a network that can support this demand. Furthermore, this mast would form part of a network that supports the work of local businesses and health services, which are under increased demand due to the COVID-19 pandemic. It is anticipated that this unprecedented use of home offices and demand upon local services will remain long after restrictions have been lifted. Therefore, it is essential to be able to provide a reliable and comprehensive

telecommunications network in order to support society's crucial needs at this challenging time.

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

Enclose map showing the cell centre and adjoining cells:

The proposed development provides a solution to upgrade the existing coverage and capacity as urgently required. The existing coverage will be maintained, and the technology will be upgraded to provide 5G. It is therefore not considered necessary to provide coverage plots in this instance.

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

Description: - A telecommunications base station located at Collieridge Way, Uxbridge Road, Hayes, London, Hillingdon, UB4 0RY.

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

Overall Height: 20m

Height of existing building (*where applicable*):

N/A

Equipment Housing:

Length:

As per attached drawings

Width:

Height:

Materials (*as applicable*):

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

As per attached drawings

Equipment housing – type of material and external colour:

As per attached drawings

Reasons for choice of design:

The proposal has been specifically designed for the site in question, taking into consideration the large trees adjacent and within the wider street scene. Whilst the proposed mast is significantly taller than the existing, it is essential in order to introduce the required technologies to the area. Although it will rise above the height of the existing trees in the immediate vicinity, it is considered that the overall benefits of the scheme will offset any potential visual impact that may arise.

Ensuring a full and reliable telecoms network has become even more critical following the COVID-19 pandemic. There is both a huge increase in people working from home and children using devices to study at home, whilst schools are closed. This second mast would contribute to a reliable and extensive telecoms network which plays a critical role in keeping society

functioning during such a pandemic. This operator has currently designated its 4G service for the exclusive use of emergency services staff, meaning that further sites are necessary to support the existing networks, in addition to contributing to the introduction of 5G technologies.

It is anticipated that many people will continue working from home even after restrictions have been lifted. Therefore, a reliable network providing a high-speed service to both residential and commercial areas is critical. Should a further wave of COVID-19 hit the country in the future, this ability to adapt to working from home quickly is essential in order to minimise societal disruption. Furthermore, this would support critical emergency services and health providers in their essential roles.

The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements needed by the operator. It is necessary for the height of the structure to ensure that the topography of the landscape does not have an unacceptable impact upon mobile signal quality and that the structure is able to support the 5G antenna and other apparatus. Ground-based equipment has been sited with the ideal to keep visual impacts to a minimum. The presence of existing vertical features surrounding the installation will provide a degree of screening to the ground-based apparatus and to the installation.

Full consideration has been given to alternative sites and other existing masts in the vicinity. It is concluded that there are no suitable rooftop solutions or land-based tower options in the area that operators would be able to peruse and be seen of a suitable specification to meet the technical needs of the two sharing-networks in order to support the 5G rollout. However, the proposed location and design are considered to provide the optimum solution in this instance.

The height of the proposed apparatus is the minimum capable of providing the technological improvements sought and satisfying ICNIRP requirements. Whilst it is acknowledged that there is a significant increase in the scale of telecommunications development on the site, it should be noted that the new technologies will provide advanced high-quality communications infrastructure essential for economic growth as sought by the NPPF.

4.0 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. 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	Yes	No
---	-------------------	------------------

government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		
Frequency	To be provided on request	
Modulation characteristics ²	To be provided on request	
Power output (expressed in EIRP in dBW per carrier) In order to minimise interference within its own network and with other radio networks, EE operates its network in such a way that radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of EE's network, the radio base station that is the subject of this application will be configured to operate in this way.	To be provided on request	
Height of antenna (m above ground level)	20m	

5.0 Technical Justification

Enclose predictive coverage plots if appropriate.

The proposed development provides a solution to upgrade the existing cell. The existing coverage will be maintained with capacity increased and the technology will be upgraded to provide 5G through the installation of the additional site. It is therefore not considered necessary to provide coverage plots in this instance.

For the 5G upgrade, MBNL are not able to utilise the existing mast currently in place, as this site is unable to accommodate for the 5G equipment. Please see below the detailed justification, as to the reasons why the existing mast has been ruled out, and why the proposed (HS2) solution is now also required;

Existing Street works Pole:

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

1. Existing Street works sites typically utilise 3x Sector Antennas at the same level with each antenna being shared by EE and 3UK. The antenna azimuths are directed 120deg apart to give 360deg total coverage for both operators.
2. Existing Street works antennas are used for 2G/3G/4G technologies for EE and 3G/4G for 3UK. In other words: voice, text and data services share the same antennas for both EE and 3UK.
3. The antennas in the current Street works pole are restricted to the 1800MHz/2100MHz frequency bands which limits the capacity of the sites. Additional 800Mhz, 1400MHz, 2600Mhz and 3500MHz bands are now available but these bands have different physical antenna requirements; the HS2 upgrades will enable usage of these additional bands to increase coverage and capacity and to enable 5G technology.
4. The existing shared antenna configuration restricts how Street works sites can be tuned for individual differences in capacity and coverage requirements between the EE and 3UK networks.

HS2 Pole Design:

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

Background:

As part of EE Ltd.'s and H3G Ltd.'s continued network improvement program they wish to upgrade the existing cell to facilitate additional coverage and capacity requirements, incorporating new technologies. Section 10 of the NPPF sets out the Government's general overview regarding supporting high quality communications infrastructure, recognising that advanced, high quality communications infrastructure is essential for sustainable economic growth.

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

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

It is imperative that support is given to the introduction of new infrastructure to allow new technology which will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds. This has become even more critical following the COVID-19 pandemic and the huge increase in people working from home and children using devices to study at home. This second mast would contribute to the telecoms network which plays a critical role in keeping society functioning during such a pandemic. It is anticipated that many people will continue working from home even after restrictions have been lifted. Therefore, a reliable network capable of meeting the capacity demands and providing a high-speed service to both residential and commercial areas is critical. Should a further wave of COVID-19 hit the country in the future, this ability to adapt to working from home quickly is essential in order to minimise societal disruption. Furthermore, this would support critical emergency services and health providers in their essential roles.

In a longer-term context, the introduction of 5G will enable places to remain competitive and will support the Government's ambition for the UK to become a world leader in telecommunications technologies and development. Whilst it is acknowledged that there is a significant increase in the scale of telecommunications development in the immediate area, it should be noted that the new technologies will provide advanced high-quality communications infrastructure essential for economic growth as sought by the NPPF. Any perceived negative impacts will be far outweighed by the overall benefits of the scheme.

All EE & H3G installations are designed to be fully compliant with the public exposure guidelines established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines have the support of UK Government, the European Union and they also have the formal backing of the World Health Organisation. A certificate of ICNIRP compliance will be included within the planning submission.

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator).

Site ³	Site Name and address	National Grid Reference	Reason for not choosing ⁴
ETS	Existing Site, Collieridge Way, Uxbridge Road, Hayes, London, Hillingdon, UB4 0RY	E: 510217 N: 181237	The existing mast currently in place is not capable of accommodating for the 5G equipment, in its current form and now requires an additional cell site to manage and maintain the increase demand on the networks in residential areas.
RT	Vodafone Rooftop Co-location, Uxbridge Rd, Hayes UB4 0RY	E: 510247 N: 181270	Due to the size and weight of the new 5G equipment, it is unlikely that there will be enough room and structural capacity to accommodate for the additional equipment.
RT	O2 Rooftop Co-location, Uxbridge Rd, Hayes UB4 0RP	E: 509896 N: 181482	As above, due to the size and weight of the new 5G equipment, it is unlikely that there will be enough room and structural capacity to accommodate for the additional equipment.
RT	Multi Operator Rooftop, Uxbridge Rd, Hayes UB4 0RJ	E: 509665 N: 181615	This rooftop already accommodates for a number of telecommunications operators, as such, there is inadequate space to house the new 5G equipment.
GF	Church Road, Hayes, UB3 2NA	E: 509896 N: 181425	Whilst this location may meet the needs of the network and radio planning, it is located within a Conservation Area and would therefore be contrary to local and national planning policies to progress a site here when the proposed will meet the needs of the network.

³ ETS - Existing Telecomm site, ES - Existing Structure, RT - Roof Top, GF - Greenfield

⁴ SP - Site Provider, RD - Redevelopment Not Possible, T - Technical Difficulties, P – Planning
O – Other

GF	Gledwood Drive, Uxbridge Rd, Hayes, UB4 0RL	E: 509794 N: 181528	A 20m mast, between the two existing rooftop sites is likely to cause interference issues, therefore impacting upon the 5G services.
----	---	---------------------	--

Additional relevant information

Planning Policy Assessment

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

National Planning Policy Framework (2018)

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

Under Section 6 paragraph 80 the NPPF advises.... *"Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."* In terms of supporting a prosperous rural economy paragraph 84... *"The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."*

In section 10 of the new NPPF, the document seeks to support *"Advanced, high quality and reliable communications infrastructure"* ensuring that it is *"essential to economic growth and social wellbeing"*. It advises that *"planning policies and decisions should support the expansion of electronic communications networks including next generation mobile technology (such as 5G) and full fibre broadband connections."* Paragraph 113 states *"the number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate."*

However, government guidance has changed. The Government-issued COVID-19 guidance (released 2 April 2020) stating... *'Now, more than ever, the country is reliant on fixed line and mobile communications networks. Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak.'*

Paragraph 114 continues *"Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications"*

development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:

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

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

The scheme will not cause any undue impact on the services outlined above and fully complies with ICNIRP standards. An ICNIRP certificate is enclosed with the application. The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for EE and H3G to enhance telecommunications services in the area to the benefit of the local community and visitors to the area. It will make effective use of the land as set out under Section 11 of the NPPF. It is considered the proposed development complies with the broad aims of the NPPF. The equipment has been sympathetically designed, with the pole being kept to the minimum practicable height for the required to accommodate 5G network coverage, thus enhancing the provision of local community facilities and services without detracting from local amenity. More sensitive sites were specifically avoided in order to minimise the impact of the proposed mast.

Local Planning Policy

The statutory development plan for the area is comprised of London Borough of Hillingdon Strategic Infrastructure Plan (May 2017), Local Plan Strategic Policies (Adopted 2012) and Saved Unitary Development Policies.

The London Plan, March 2016

“POLICY 4.11 ENCOURAGING A CONNECTED ECONOMY

Strategic

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

a) facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive connectivity meeting the needs of small and larger enterprises and individuals.

b) Support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits.”

It is contended that the installation will comply with Policy 4.11, securing the Mayor's vision for the delivery of modern communications networks across London. The proposed installation will bring 5G to the area, supporting modern infrastructure and providing the best network connectivity possible across Hillingdon.

The 5G network is to be the fastest service operators are able to provide, the new technology will enable easy and rapid access to information. The services provided by the mast will benefit both the local community and those working in the area.

Following the current COVID-19 pandemic, it is anticipated that many people will continue working from home even after restrictions have been lifted. Therefore, a strong network providing a reliable and high-speed service to both residential and commercial areas is critical. Should a further wave of COVID-19 hit the country in the future, this ability to adapt to working from home quickly is essential in order to minimise societal and economic disruption.

Hillingdon Strategic Infrastructure Plan (May 2017)

“4.2.6 Telecoms and Broadband

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

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

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

Securing a 5G development will improve the social and environmental conditions in the area and will provide significant benefits to the community in general. The current application forms part of a multi-million-pound trial of new high-speed connectivity, paving the way for the future rollout of 5G across the UK. The installation has been designed to the highest possible standard, utilising the latest equipment available.

It is assured that the presence of 5G within the area will provide significant benefits to both the local community and businesses alike. The proposal incorporates the latest technologies and design techniques to ensure that the proposed monopole will be as easily assimilated into the existing environment as it is able to be. It is determined that the benefits of granting planning permission would significantly outweigh any potential perceived negative impacts and accordingly it is contended that permission should be granted in line with the above statement.

Full consideration has been given to alternative sites and other existing masts in the vicinity. However, the proposed location and design are considered to provide the optimum solution.

It is noted that the recent planning application was refused due to the visual impact of the monopole. However, the proposed location would have the least possible visual impact on the residential dwellings in the area. Since the previous planning application was refused, government guidance has changed. The Government-issued COVID-19 guidance (released 2 April 2020) stating... *'Now, more than ever, the country is reliant on fixed line and mobile communications networks.*

Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak.'

As the country faces this crisis, demand has shifted to different locations and there is a far greater demand and thus requirement for increased capacity. It is highly likely the population will work in this manner well beyond when any restrictions are lifted. Consequently, the capacity now and in the future requires a second pole rather than a replacement. In this instance the proposed mast would form part of a network upgrade – ensuring that capacity and reliability is increased. This is an urgent and essential task with regards to new demands on the networks following the current COVID-19 pandemic.

Considering these new circumstances, it is contended that the policy would be complied with.

Local Plan Strategic Policies (Adopted 2012)

“Policy HE1: Heritage

The Council will:

1. *Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes: Historic village cores, Metro-land suburbs, planned residential estates and 19th and 20th century industrial*

areas, including the Grand Union Canal and its features; Designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments; Registered Parks and Gardens and historic landscapes, both natural and designed; Locally recognised historic features, such as Areas of Special Local Character and Locally Listed Buildings; and Archaeologically significant areas, including Archaeological Priority Zones and Areas.

- 2. Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant.*
- 3. Promote increased public awareness, understanding of and access to the borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities.*
- 4. Encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset."*

The site in questions is not located within any designations, some 100m South East of the site lies Hayes Village Conservation area. The historic features within the Conservation Area to the centre, around Barra Hall Park with residential dwellings, in the form of townhouses towards the boundary. Adjacent to the site, outside of the Conservation Area, Highstreet shops and nearby blocks of flats lack architectural merit.

Mecca Bingo Club, formerly The Savory Cinema is the nearest listed building. The former cinema is now engrossed with signage. High rise tower blocks overlook the Bingo Club, detracting from any historical significance once had. It is therefore considered that nearby heritage assets will remain unaffected.

"Policy CI1: Community Infrastructure Provision

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

- 1. Resisting of the loss of community facilities, and where the loss of these facilities is justified it will seek to ensure that resulting development compensates these uses to ensure no net loss;*
- 2. Supporting the retention and enhancement of existing community facilities;*
- 3. Supporting extensions to existing schools and the development of new schools and youth facilities;*
- 4. Encouraging the development of multi-purpose facilities that can provide a range of services and facilities to the community at one accessible location;*
- 5. Promoting innovation in service provision and recognising that there are a range of modes appropriate for providing for all sections of the community;*

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

The proposed installation will bring 5G to the area, supporting modern infrastructure and providing the best network connectivity possible across Hillingdon. The 5G network is to be the fastest service operators are able to provide, the new technology will enable easy and rapid access to information. The installation is located within an area, popular with residential dwellings and shops, the services provided by the mast will benefit both the local community and businesses within the immediate area.

Full consideration has been given to alternative sites and other existing masts in the vicinity. However, the proposed location and design are considered to provide the optimum solution.

It is noted that the recent planning application was refused due to the visual impact of the monopole. However, the proposed location would have the least possible visual impact on the residential dwellings in the area. Since the previous planning application was refused, government guidance has changed. The Government-issued COVID-19 guidance (released 2 April 2020) stating... *‘Now, more than ever, the country is reliant on fixed line and mobile communications networks. Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak.’*

As the country faces this crisis, demand has shifted to different locations and there is a far greater demand and thus requirement for increased capacity. It is highly likely the population will work in this manner well beyond when any restrictions are lifted. Consequently, the capacity now and in the future requires a second pole rather than a replacement. In this instance the proposed mast would form part of a network upgrade – ensuring that capacity and reliability is increased. This is an urgent and essential task with regards to new demands on the networks following the current COVID-19 pandemic.

Considering these new circumstances, it is contended that the policy would be complied with.

Saved Unitary Development Policies.

“Policy BE37

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

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

It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds than is possible using the existing technology. This will enable places to remain competitive in and will support the Government’s ambition for the UK to become a world leader in 5G.

Following the COVID-19 pandemic, it is imperative that telecommunications is not only maintained but also upgraded to ensure capacity and real time data is at the forefront. Telecommunications is considered as a critical service as it provides data to network operatives, field engineers, call centre staff, IT and data infrastructure, 999 and 111 staff. This upgrade will allow telecommunications infrastructure provides (EE/H3G) to assure quality, capacity and operational performance so that customers have uninterrupted access to crucial mobile and broadband services at this critical time. The operator EE has dedicated its entire 4G network to the emergency services, meaning it is crucial that 2G and 3G networks are fully supported by an adequate number of sites.

Full consideration has been given to alternative sites and other existing masts in the vicinity. However, the proposed location and design are considered to provide the optimum solution.

It is noted that the recent planning application was refused due to the visual impact of the monopole. However, the proposed location would have the least possible impact on the residential dwellings in the area. Since the previous planning application was refused, government guidance has changed. The Government-issued COVID-19 guidance (released 2 April 2020) stating... ‘Now, more than ever, the country is reliant on fixed line and mobile communications networks.

Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak.’

As the country faces this crisis, demand has shifted to different locations and there is a far greater demand and thus requirement for increased capacity. It is highly likely the population will work in this manner well beyond when any restrictions are lifted. Consequently, the capacity now and in the future requires a second pole

rather than a replacement. In this instance the proposed mast would form part of a network upgrade – ensuring that capacity and reliability is increased. This is an urgent and essential task with regards to new demands on the networks following the current COVID-19 pandemic.

The mast has been specifically designed for the site in question, taking into account site specific characteristics as highlighted above. The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for EE Ltd and H3G (UK) Ltd. In all these circumstances it is contended that the proposed development complies with the aims and objectives of Policy BE37.

“Policy BE13

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

It is contended that the proposed mast, which will introduce 5G technologies to the area will support the local economy in this active setting. The most up to date equipment will be provided and the benefits of the proposal far outweigh any perceived negative impacts. Other vertical elements in the form of associated road signage, CCTV units, speed camera units, traffic lights, mature trees, street lighting columns and high-level tower blocks and the existing mast already exist in the street scene without causing any undue harm.

It is noted that the recent planning application was refused due to the visual impact of the monopole. However, the proposed location would have the least possible visual impact on the residential dwellings in the area. Since the previous planning application was refused, government guidance has changed. The Government-issued COVID-19 guidance (released 2 April 2020) stating... ‘Now, more than ever, the country is reliant on fixed line and mobile communications networks.

Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak.’

As the country faces this crisis, demand has shifted to different locations and there is a far greater demand and thus requirement for increased capacity. It is highly likely the population will work in this manner well beyond when any restrictions are lifted. Consequently, the capacity now and in the future requires a second pole rather than a replacement. In this instance the proposed mast would form part of a network upgrade – ensuring that capacity and reliability is increased. This is an urgent and essential task with regards to new demands on the networks following the current COVID-19 pandemic.

It is considered that the proposed monopole will merely be seen as another vertical element in the street scene. In all these circumstances it is contended that the proposal is suitable to the form and function of the site and therefore complies with Policy BE13.

Local Plan Part 2 – Development Management Policies (adopted 2020)

Policy DMHB 11: Design of New Development

A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including: i) harmonising with the local context by taking into account the surrounding: • scale of development, considering the height, mass and bulk of adjacent structures; • building plot sizes and widths, plot coverage and established street patterns; • building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure; □ architectural composition and quality of detailing; □ local topography, views both from and to the site; and • impact on neighbouring open spaces and their environment. ii) ensuring the use of high quality building materials and finishes; iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities; iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space. C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs. D) Development proposals should make sufficient provision for well-designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

It is contended that the proposed mast, which will introduce 5G technologies to the area will support the local economy in this active setting. The most up to date equipment will be provided and the benefits of the proposal far outweigh any perceived negative impacts. Other vertical elements in the form of associated road signage, CCTV units, speed camera units, traffic lights, mature trees, street lighting columns and high-level tower blocks and the existing mast already exist in the street scene without causing any undue harm.

It is noted that the recent planning application was refused due to the visual impact of the monopole. However, the proposed location would have the least possible visual impact on the residential dwellings in the area. Since the previous planning

application was refused, government guidance has changed. The Government-issued COVID-19 guidance (released 2 April 2020) stating... *'Now, more than ever, the country is reliant on fixed line and mobile communications networks.*

Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak.'

As the country faces this crisis, demand has shifted to different locations and there is a far greater demand and thus requirement for increased capacity. It is highly likely the population will work in this manner well beyond when any restrictions are lifted. Consequently, the capacity now and in the future requires a second pole rather than a replacement. In this instance the proposed mast would form part of a network upgrade – ensuring that capacity and reliability is increased. This is an urgent and essential task with regards to new demands on the networks following the current COVID-19 pandemic.

It is considered that the proposed monopole will merely be seen as another vertical element in the street scene. In all these circumstances it is contended that the proposal is suitable to the form and function of the site and therefore complies with Policy DMHB11.

Policy DMHB 12: Streets and Public Realm

A) Development should be well integrated with the surrounding area and accessible. It should: i) improve legibility and promote routes and wayfinding between the development and local amenities; ii) ensure public realm design takes account of the established townscape character and quality of the surrounding area; iii) include landscaping treatment that is suitable for the location, serves a purpose, contributes to local green infrastructure, the appearance of the area and ease of movement through the space; iv) provide safe and direct pedestrian and cycle movement through the space; v) incorporate appropriate and robust hard landscaping, using good quality materials, undertaken to a high standard; vi) where appropriate, include the installation of public art; and vii) deliver proposals which incorporate the principles of inclusive design. Proposals for gated developments will be resisted.

B) Public realm improvements will be sought from developments located close to transport interchanges and community facilities to ensure easy access between different transport modes and into local community facilities.

It is contended that the proposed mast, which will introduce 5G technologies to the area will support the local economy in this active setting. The most up to date equipment will be provided and the benefits of the proposal far outweigh any perceived negative impacts. Other vertical elements in the form of associated road signage, CCTV units, speed camera units, traffic lights, mature trees, street lighting

columns and high-level tower blocks and the existing mast already exist in the street scene without causing any undue harm.

It is noted that the recent planning application was refused due to the visual impact of the monopole. However, the proposed location would have the least possible visual impact on the residential dwellings in the area. Since the previous planning application was refused, government guidance has changed. The Government-issued COVID-19 guidance (released 2 April 2020) stating... *'Now, more than ever, the country is reliant on fixed line and mobile communications networks.*

Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak.'

As the country faces this crisis, demand has shifted to different locations and there is a far greater demand and thus requirement for increased capacity. It is highly likely the population will work in this manner well beyond when any restrictions are lifted. Consequently, the capacity now and in the future requires a second pole rather than a replacement. In this instance the proposed mast would form part of a network upgrade – ensuring that capacity and reliability is increased. This is an urgent and essential task with regards to new demands on the networks following the current COVID-19 pandemic.

It is considered that the proposed monopole will merely be seen as another vertical element in the street scene. In all these circumstances it is contended that the proposal is suitable to the form and function of the site and therefore complies with Policy DMHB12.

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.

It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds than is possible using the existing technology. This will enable places to remain competitive in and will support the Government's ambition for the UK to become a world leader in 5G.

Following the COVID-19 pandemic, it is imperative that telecommunications is not only maintained but also upgraded to ensure capacity and real time data is at the

forefront. Telecommunications is considered as a critical service as it provides data to network operatives, field engineers, call centre staff, IT and data infrastructure, 999 and 111 staff. This upgrade will allow telecommunications infrastructure provides (EE/H3G) to assure quality, capacity and operational performance so that customers have uninterrupted access to crucial mobile and broadband services at this critical time. The operator EE has dedicated its entire 4G network to the emergency services, meaning it is crucial that 2G and 3G networks are fully supported by an adequate number of sites.

Full consideration has been given to alternative sites and other existing masts in the vicinity. However, the proposed location and design are considered to provide the optimum solution.

It is noted that the recent planning application was refused due to the visual impact of the monopole. However, the proposed location would have the least possible impact on the residential dwellings in the area. Since the previous planning application was refused, government guidance has changed. The Government-issued COVID-19 guidance (released 2 April 2020) stating... *'Now, more than ever, the country is reliant on fixed line and mobile communications networks.*

Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak.'

As the country faces this crisis, demand has shifted to different locations and there is a far greater demand and thus requirement for increased capacity. It is highly likely the population will work in this manner well beyond when any restrictions are lifted. Consequently, the capacity now and in the future requires a second pole rather than a replacement. In this instance the proposed mast would form part of a network upgrade – ensuring that capacity and reliability is increased. This is an urgent and essential task with regards to new demands on the networks following the current COVID-19 pandemic.

The mast has been specifically designed for the site in question, taking into account site specific characteristics as highlighted above. The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for EE Ltd and H3G (UK) Ltd. In all these circumstances it is contended that the proposed development complies with the aims and objectives of Policy DMHB21.

CONCLUSION

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

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

Following the current COVID-19 pandemic, it is anticipated that many people will continue working from home even after restrictions have been lifted. Therefore, a strong network providing a reliable and high-speed service to both residential and commercial areas is critical. Should a further wave of COVID-19 hit the country in the future, this ability to adapt to working from home quickly is essential in order to minimise societal and economic disruption. Furthermore, the proposed mast would contribute to a telecommunications network supporting emergency services and local health providers. These are critical services in the current pandemic climate.

In terms of siting and design, it is considered that the proposal responds well to the character and appearance of the local environment and will not have an unacceptable adverse impact on the application site or the surrounding area. The design is of a high standard and will not detract significantly from the existing visual and environmental character of the area. The benefits to residents and visitors to the area, by the introduction of 5G technologies to the area far outweigh any potential perceived negative impacts. In all these circumstances it is concluded that there no policy or other objections that would warrant the refusal of planning permission and accordingly permission should be granted for the proposed development.

Contact Details

Name (agent)	George Oliver Beacon Communications Services Ltd.	Telephone	07543379150
Operators	MBNL, EE(UK) Ltd & H3G (UK) Ltd	Fax no	N/a
Address		Email address	George.oliver@beaconcomms.co.uk
Signed	G Oliver	Date	23/04/2020
Position	Town Planner	Company	For and on behalf EE Ltd & H3G (UK) Ltd