

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Bayliss	Site Address:	Long Lane, Hillingdon, Uxbridge, UB10 0EG
National Grid Reference:	E: 507437 N: 182813		
Site Ref:	HGN038	Site Type: ¹	Macro

2. Pre-Application Check List - Site Selection (for New Sites only)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why:		
No suitable alternatives were identified.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		
No suitable alternatives were identified.		

Annual Area Wide Information to local planning authority

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

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	02/03/2020
Was there pre-application contact:	
Date of pre-application contact:	
Name of contact:	
Summary of outcome/Main issues raised:	
No response.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	AMBER
The site has been rated as AMBER for consultation purposes, given the sites location, the LPA, ward councillors, nearby schools and PM were consulted on this occasion. Consultees are as follows: <u>MP</u> Boris Johnson <u>Councillors</u> Councillor Wayne Bridges Councillor Alan Chapman	

School/College

Location of site in relation to school/college (<i>include name of school/college</i>):
- Hillingdon Primary School - Highfield Primary School
Outline of consultation carried out with school/college (<i>include evidence of consultation</i>):
Hillingdon Primary School MRs Ann Bowen-Breslin (Headteacher) Mr Raaj Bains (Chair of Governors) Highfield Primary School Ms Lisa Corrigan (Headteacher) Ms Suzi Goldsmith (Chair of Governors) Consulted 02/03/2020
Summary of outcome/Main issues raised:
No response received.

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	
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	YES	
Details of response:		
No response received – Pre-consultation issued on 03/07/2020. Issued to Northolt Jet Centre.		

Developer's Notice

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

3.0 Proposed Development

The proposed site: The proposed new mast has been sited and designed in order to provide 5G coverage and to support the existing mobile network. At present it is paramount that digital connectivity is supported and maintained throughout the country. In particular the current massive shift in user demand from city centres and places of work to residential areas and suburbs requires an improvement in coverage and capacity throughout the whole network. The current proposal therefore provides such additional capacity to the network whilst still promoting the improved 5G technology. The proposed development is within the limits set out in Part 16 for permitted development with Prior Approval. The location enables the whole of the surrounding area to benefit from improved cover and capacity of the existing network as well as the introduction of 5G network coverage and has been designed to be future proof, thus enabling other technologies to be deployed depending upon the demand required. As the shift in demand is expected for the foreseeable future and that as central government considers digital communications to be a critical national infrastructure, we intend to support customers and local residents by ensuring as little disruption as possible. The existing site will therefore be retained so that all existing users may benefit at this difficult time. In addition, EE will become the Emergency Services Network Provider and in order to dedicate the 4G network for that use, the intention is to support all users during the current climate and to maintain all current services without the removal of any existing equipment. The applicant would also like to stress in today's current crises (COVID-19) it is imperative the communications is not only maintained but also enhanced to ensure capacity and real time data is at the forefront. Telecommunications is considered as a critical service as it is providing data to network operatives, field engineers, call centre staff, IT and data infrastructure, 999 and 111 critical services. This new cell will allow telecommunications infrastructure provides (EE/H3G) to assure quality, capacity and operational performance so that customers have uninterrupted access to crucial mobile and broadband services at specifically at this critical time. The additional cell is to be located in an area mixed with residential and commercial assets on the busy A437 which connects onto the A4020 which leads into the heart of Hillingdon. There is two existing telecommunications infrastructure units residing in the area one Greenfield tower located just behind screwfix, approx. 180m South and also a telecommunications pole located just outside the BP garage located approx. 150m South. Long Lane is a wide road with extensive mature tree cover, mature trees lining both sides of the highway on the grass verge with residential dwellings set back behind the mature tree cover.
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The area surrounding the additional mast consist of schools, commercial assets dotted around Uxbridge Road, Hillingdon Fire Station, Mead House/Hillingdon Hospital and large areas of open space. The additional cell proposes increased capacity and coverage to the existing network and the advancement and future proofing of bringing 5G to the area. All assets labelled above will benefit from the technological advancements. Specifically the emergency services, as the improvement on the existing network will allow the emergency services to receive data in real time and at high speeds to enable them to act quickly.

The nearest residential dwellings to the West are located approx. 25m from the proposed additional cell. Views of the cell from this dwelling (and the adjacent dwellings in the row of properties) would be heavily obscured by the existing bank of mature trees (several trees deep). To the East located approx. 55m are also residential dwellings. View of the additional cell from these dwellings would also be heavily obscured by the existing mature trees situated in between the dwellings and the additional cell. The additional cell is located on the grass verge in-between an existing street lighting columns and road sign billboard, opposite the additional cell is also a bus stop. All of these vertical elements providing screening and character to the context of the site with pedestrian crossings and additional bus stops located upon the A437.

The wide and busy nature of this A-road would make it an appropriate location for the additional cell. The existence of mature trees surrounding the cell would minimise the visual appearance, the vertical features including bus stops, road signs, bollards, mid-level fencing, existing infrastructure and other elements provide context to the area. The applicant believes that the additional cell would fit well within the street scene and will have no adverse effects in relation to siting and appearance due to the reasons stated prior.

Long Lane is designated as a London distributor road. The additional mast would not create any new entrances off this road or create any parking requirements; therefore it would not interrupt the existing flow of traffic on this busy highway.

Approximately 95m to the West is Hillingdon Village Conservation Area. Views of the additional cell from this area would be obscured and heavily interrupted by existing development and mature tree cover, ensuring no harm to the character or appearance of the conservation area. Located approx. 400m East of the additional cell is an area of Archaeological priority area, for the reasons above and also the distance the additional cell will have no effect on the heritage of this area. Furthermore, located approx. 400m North-East of the site location is a Green Belt area; the applicant would like to mention that the proposed additional mast will have no effect on the character of that area. Furthermore, the applicant would like to highlight the site location (circled in yellow Figure 1) is not located within any restrictive land designation areas, the proposed additional cell area has been specifically chosen to provide balance between optimum network coverage and least harmful impact on the character of the surrounding area.

Figure 1: London Borough of Hillingdon Planning Policies Map (Additional cell circled in Yellow)

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

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

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

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

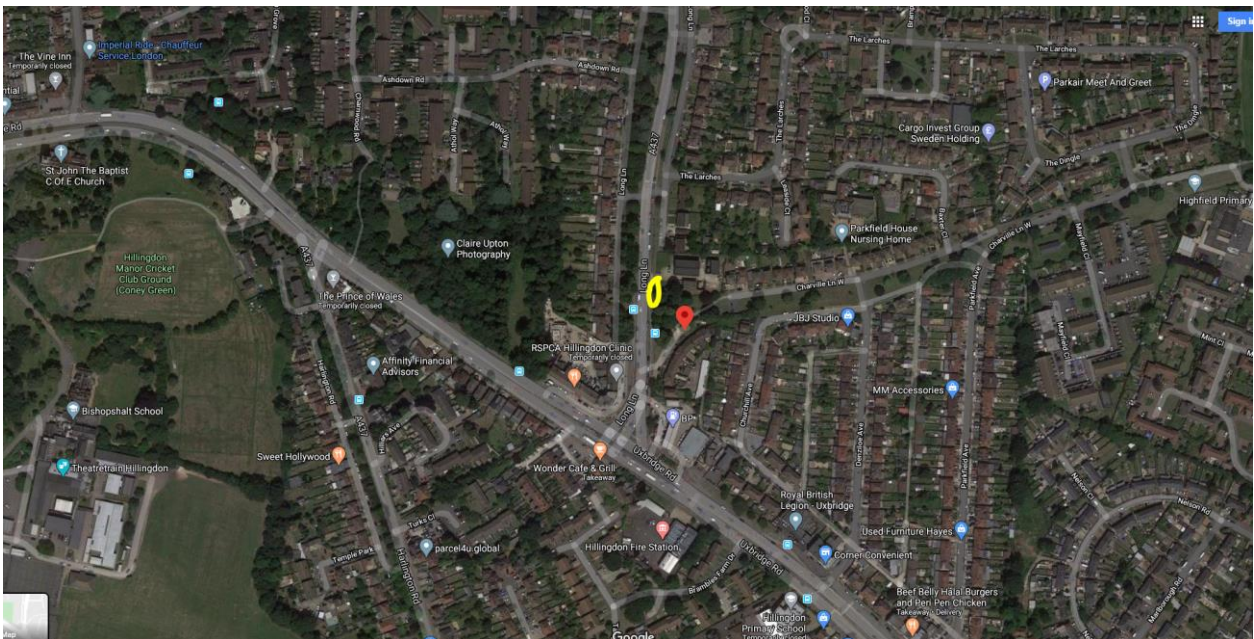
Streetview of the proposed site location heading North, along A437.



Streetview of the proposed site location heading South, along A437.



Birds eye view of proposed cell location, UB10 0EG



Planning History (Within a similar area)

Reference: 60754/APP/2014/4072

Removal of existing 12m high replica telegraph pole mast and installation of a replacement 11.7m high streetworks tower, associated ground based equipment cabinets and ancillary development (Consultation under Schedule 2, Part 24 of the Town and Country Planning (General Permitted Development) Order 1995) (as amended).

Decision: 03/01/15 – Approved

Reference: 60754/APP/2005/1574

Installation of a 12 metre high imitation telegraph pole mobile phone mast and equipment cabinets (consultation under schedule 2, part 24 of the town and county planning (General Permitted Development) Order 1995 (as amended)).

Decision: 12/07/2005 – Refused (P) Appealed

Reference: 60754/APP/1574

DETR Ref: APP/R5510/A/05/1187592

Installation of a 12 metre high imitation telegraph pole mobile phone mast and equipment cabinets (consultation under schedule 2, part 24 of the town and county planning (General Permitted Development) Order 1995 (as amended)).

Appeal Decision: 27/01/2006 – Allowed.

Current Telecommunications Use/ The Future

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

Enclose map showing the cell centre and adjoining cells:

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

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

Description: - The installation of the telecommunications cell located at Bayliss, Long Lane road, Hillingdon, Uxbridge, UB10 0EG.

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

As per attached drawings

external colour:	
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Reasons for choice of design:

The mast has been specifically designed for the site in question, considering the existing street scene along the A437. Whilst the additional mast is taller than that which already exists nearby, it needs to be in order to introduce the required technologies to the area. It is necessary for the height of the structure to ensure that interference is avoided, the topography of the landscape does not have an unacceptable impact upon mobile signal quality and that the structure is able to support the 5G antenna and other apparatus. It also needs to be tall enough to satisfy ICNIRP standards and would not provide the levels of coverage and capacity of the existing and emerging networks/technologies.

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

The mast will be seen amongst the backdrop of mature trees, located all across the same grass verge. Lighting columns, tree cover, mid-level fencing, existing infrastructure, street signage/bollards, bus stops and the presence of the pedestrian crossing will provide context. The apparatus has been specifically designed and sited, to allow for continued free flow pedestrian passage, upon the pavement. The additional cell has been located as not to impede upon motorist's visibility splays when travelling along the A437 and using nearby junctions, avoiding conflict with nearby mature trees.

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

It is accepted that the proposed monopole would extend higher than the top of the crowns of the mature trees located on the grass verge just off the A437. However, the structure is slim and designed in a way that fits in within the surrounding street furniture. The limited visual impact of the proposed monopole will be screened by the vertical elements residing in the area. The proposed monopole would not have any significant adverse impact on the appearance or character of the location or the street scene. The monopole is slim in form and would be seen in the context of the current character of the locality with existing vertical elements, including street lighting columns, pedestrian crossing, street signage, bus stops, mid-level fencing, existing infrastructure, bollards and the existing mature trees located on the same grass verge adjacent to the proposed cell providing screening from all angles further mitigating views. The latter would provide a screening to a large section of the monopole further mitigating visual impacts.

Network Planners have indicated that the position of the additional cell is the ideal location to provide optimum coverage to both enhance the capacity of the current network and also bring advanced technologies to the area. It should be noted that the new technologies and increase

to the existing network will provide high-quality and high-speed critical communication infrastructure, this is essential for economic growth and to improve a critical service as illustrated in the NPPF and Government COVID-19 aim.

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

4.0 Technical Information

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

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.

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

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

Proposed HS2 Pole Design:

1. In order to maintain coverage (which is height dependent) for all frequency bands and technologies the lowest antenna height in the HS2 design must be the same as, or greater than, the antenna height of the existing Street works pole.
2. Reducing the antenna height would potentially remove coverage for existing mobile phone users.
3. The HS2 design contains 12x Individual sector antennas positioned at 4 levels (3x 120deg sector antennas per level)
4. The antennas in the lower two levels provide 2G/3G/4G coverage in the 800MHz, 1400MHz, 1800MHz, 2100MHz and 2600MHz Bands. These antennas provide a mixture of voice, data and text to mobile phone users.
5. The antennas in the upper two levels provide 5G coverage in the 3500MHz band. These antennae provide 5G high speed / low latency packet data (for applications such as HD Video, Home Broadband and Machine to Machine Communications)
6. The 3500MHz band has the poorest radio propagation characteristics of all the presently available bands – this issue is somewhat mitigated by positioning them at the top of the antenna array.

7. Some vertical separation (0.5m) is required between antennas to prevent adjacent antennas interfering with each other.

8. Many elements of antenna sharing between EE and 3UK are removed in the HS2 design. This means that the site can be better tuned for EE and 3UK's individual coverage and capacity requirements.

Background:

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

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

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

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

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

Site ³	Site Name and address	National Grid Reference	Reason for not choosing ⁴
RT – Tall Buildings			There are no tall buildings within the area capable of addressing the network requirement of this location. To address this requirement buildings would need to be generally in excess of 15m in height and there are none in the locality. Even if there were sufficiently high buildings then these would require roofs that are structurally capable of accommodating the required equipment, which would be in the form of a stub tower. Such structures are likely to be more visually intrusive than a slim monopole as is proposed at the proposed new site.
ETS	Existing Mast, Uxbridge Road, Hillingdon, UB10 0EG	E: 507447 N 182665	The nearby EE/H3G mast currently in place is not capable of accommodating for the 5G equipment, in its current form.
ETS	CO-Located masts within the area.		This existing structure does not meet the essential network needs and capacity required for the 5G upgrade. Also does not comply with network planner's recommendation of optimum level of coverage.
GF			Placing a GF unit within this area would require a 30M+ structure which would be taller in both height and width, therefore would be deemed to cause further harm to the character of the area than the proposed cell. Furthermore, there already resides a GF tower within the

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

			vicinity, this was also found unsatisfactory due to structural integrity and ICNIRP compliance due to the existing equipment.
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Additional relevant information

Planning Policy Assessment

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

National Planning Policy Framework (2018)

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

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

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

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

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



structures interfering with broadcast and electronic communications services.

National Planning Policy Framework (2019)

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

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

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

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

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

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

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

Planning (Listed Buildings and Conservation Areas) act 1990

Section 72 of the Planning (Listed Buildings and Conservation Areas) act 1990 requires the Local Planning Authority to ‘pay special attention’ to the desirability of preserving the character and appearance of Conservation Areas within their jurisdiction



Local Planning Policy

The statutory development plan for the area is comprised of The London Plan, Adopted March 2016 and LB Hillingdon Local Plan, Adopted January 2019.

The London Plan, March 2016

“Policy 4.10 New & Emerging Economic Sectors

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

“POLICY 4.11 ENCOURAGING A CONNECTED ECONOMY

Strategic

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

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

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

Living Spaces and Places

“Policy 7.1 Local Character

Strategic

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



Planning decisions

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

LDF preparation

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

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

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

Planning decisions

C Development Proposals should:

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

b prioritise assisting in achieving targets in biodiversity action plans (BAPs), set out in

Table 7.3, and/or improving access to nature in areas deficient in accessible wildlife sites

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

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

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

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

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

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

1 avoid adverse impact to the biodiversity interest

2 minimize impact and seek mitigation

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

The applicant would like to highlight the necessity of having the proposed additional cell within this area, network planners have identified this site as a prime location to enhance coverage/capacity to the optimum level and bring new technologies to the area. The linear arrangement and slim nature of design has ensured little harm is done to existing trees and local character; furthermore this is not a land designated area. Moreover, the applicant would like to highlight that the additional cell will not harm any trees or vegetation currently residing within the area and therefore this application should be supported.

“Policy 7.4 Local Character

Policy 7.4 states that design should have regard to the form, function and structure of an area, place or street (Policy 7.4A).

It has been noted that the proposal respects and takes into account the existing structures, and the area more generally, the character of this section of the A437. The proposal is in a location which is sufficiently screened by existing mature trees as well as being in a location with significant vertical elements comprising lighting columns, street furniture, road signs, bus stops, mid-level fencing, existing infrastructure and pedestrian crossing nearby as well as other significant street furniture. Therefore, the applicant would like to stress that the prejudice to the area does not outweigh the public benefit and current demand for improved coverage and capacity and therefore should



be supported in relation to Policy 7.4.

“POLICY 7.5 PUBLIC REALM & Emerging London Plan

“Policy D8 – Public Realm

Strategic

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

Planning decisions

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

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

This policy identifies that the public realm should be accessible, connected and incorporates the highest quality design (among other factors). The limited visual impact of the proposed cell is illustrated within the drawings, the slim design and linear arrangement of cabinets is similar to that already within the vicinity. The location of the proposal within this area, specifically not located within any protected land designations also ensures that the proposal satisfies the requirements of this policy.

The height for the new cell is the minimum capable of providing the technological improvements sought. It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds than is possible using the existing technology, this is important in the current crises as it will support critical communication coverage. This will enable places to remain competitive and will support the Government’s ambition for the UK to become a world leader in 5G; furthermore this will support the Government’s latest guidance regarding critical communications and COVID-19. The proposed mast needs to be taller than the existing masts within the vicinity to introduce the required new technologies to the area and satisfy ICNIRP requirements. It will therefore slightly rise above the height of the nearby trees and street furniture. However, it is contended that the public benefit/requirement for this proposed development outweighs any harm to the character of the area.

“ Policy 7.6 Architecture

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

Emerging London Plan

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

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

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

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

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

“Policy D4 – Delivering a good design

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

“ Policy GG1 Building Strong and inclusive Communities

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

“Policy E8 Sector Growth Opportunities and Clusters

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

“Policy S16 Digital Connectivity Infrastructure

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

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



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

Hillingdon 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 provides the necessary infrastructure for broadband provider fixed roll-out.

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

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

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

The proposal incorporates the latest technologies and design techniques to ensure that the proposed monopole will be as easily assimilated into the existing environment. 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.

Hillingdon Local Plan – Parts 1 and 2

Local Plan Strategic Policies (Adopted 2012)

"Policy BE1: Built Environment"

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



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

"Part 1: Vision for Hillingdon"

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

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

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

"Policy 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 dwelling shops and public transport, the services provided by the mast will benefit both the local community and businesses within the immediate area. Whilst there will be some visual impact it is contended that the character and appearance of the area will not be unacceptably harmed and the overall benefits of the proposal will outweigh any perceived harm.

“Policy BE37

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

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

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

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

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

“Policy BE13

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

Whilst there will be an increase in the height of the installation, it is contended that the proposed mast, the additional cell will support and enhance the current ‘critical network’ which is imperative during the COVID-19 pandemic and will introduce 5G technologies to the area which 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, pedestrian crossing, bus stops, traffic lights, mature trees, street lighting columns and mid-level fencing already exist in the street scene without causing any undue harm. It is considered that the proposed monopole will merely be seen as another vertical element and would fit well within 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.

“Part 2 – Policy DMHB 11: Design for Development

Part A of this policy sets out in detail design requirements for all development which it identifies should be of the highest standard. The policy includes a range of issues to be addressed including: harmonising with the local context; use of high-quality finishes and materials; maximising sustainability; protecting features of positive value within and adjacent to the site; and use of landscaping and tree planting.

It has been demonstrated that the proposed base station achieves a high-quality design taking into account the specific technical requirements for the proposal. The proposed monopole is the minimum height and girth for the proposal; it allows the sharing of facilities by two, otherwise competing, service providers (thereby avoiding proliferation of base stations); it is located close to mature trees which mitigate the visual impact of the proposal and also fits in well within the street scene alike.

Part B notes developments should not affect amenity, biodiversity and green infrastructure as illustrated above there will be no affect to any nearby trees or vegetation and therefore the proposal adheres to this part of the policy.

“Part 2 – Policy DMHB 12: Streets and Public Realm

This policy sets out a range of factors to be considered in terms of streets and public realm. It has been demonstrated that the proposal will not affect the visual quality of the surrounding area and does not have an impact on the public realm.

“Part 2 – Policy DMHB 14, BE19 & BE38

This policy sets out the protection of trees and landscaping on all planning applications for proposals that would affect existing trees and landscape.



The applicant would like to highlight that the scheme will not adversely affect any green infrastructure within the area. There may be a slight net loss in terms of green space as the additional cell and cabinets will be located on the grass verge, however the linear arrangement of the cabinets will ensure this is kept to a minimum. Furthermore, there are no TPO's or any restrictive land policies within this area and therefore the applicant argues the application adheres to Policies DMHB 14, BE19 and BE38.

"Part 2 – Policy DMHB 21: Telecommunications"

This policy sets out the specific requirements for telecommunications development:

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

Not have a detrimental impact on visual amenity, character or appearance of the building or local area: The proposal has a very limited impact on residential amenity as a result of screening and oblique angles from the surrounding properties, and being separated by roads and other features. Impact on the character of the local area has been addressed in i) The fenestration on the façade of the residential assets located 35M East will be mitigated by the backdrop of mature trees and also mature trees on the grass verge located in between the view from the residential assets to the additional mast.

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

There is no impact on natural history and heritage interests. It has been demonstrated that the proposed development is not anticipated to have an adverse impact on nearby trees as mentioned prior in the application but, regardless of this, the applicant would accept conditions that would give effect to the recommendations set out in an Arboriculture assessment, if so required. As demonstrated earlier in this statement the proposed development is not sited within any protective land designation area nor directly affects any historical assets or heritage locations.

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

CONCLUSION

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

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



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

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

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

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Signed *S.Dhillon* **Date** **21/05/2020**

Position **Acquisition & Planning Surveyor** **Company** **Beacon Communications**

**For and on behalf
of MBNL, EE Ltd &
H3G (UK) Ltd**