

5G SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION STATEMENT PREPARED BY DOT SURVEYING
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1. Site Details

Site Name:	Bridle Road Streetworks	Site Address:	Bridle Road Eastcote London HA5 2TH
NGR:	E 511217, N 188516		
Site Ref Number:	HGN12189	Site Type:	Proposed 5G telecoms installation: 20m high Streetpole and 3no cabinets with ancillary works.

2. Pre-Application Check List

Site Selection

Was Hillingdon Council's mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why:		
It was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why:		
N/a		

Pre-application consultation with Hillingdon Council

Written offer of pre-application consultation:	N/a	
Was there pre-application contact:		Yes
Date of pre-application contact:	04 th June 2020	
Name of contact:	Planning Dept Email	

Summary of outcome/Main issues raised:

H3G (Three) is committed to providing improved network coverage and capacity, most notably in relation to 5G services. In these unprecedented times of the Covid-19 pandemic, it is recognised that high-speed mobile connectivity is the lifeblood of a Community; facilitating educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home, as well as enjoying access to social, media and gaming for leisure time activities.

The pre-consultation invited comments within a two-week period and while the merits of high-speed telecommunications are generally recognised; pre-application has identified the need to carefully consider the risk of increased visual amenity to adjoining residential properties through the siting of telecommunications infrastructure within urban settings.

Following the submission of an e-mail to the council's planning department back in June 2020, to the best of my knowledge, the planning department provided no formal feedback in respect of the proposed scheme itself. The e-mail communication included a set of planning drawings, site information sheet and an explanation behind the requirement for a new telecommunications installation. The information sheet also included a brief outline of other sites that have been investigated and discounted. Further details of the discounted sites are included within this document.

Please note, an application was subsequently lodged on the 18th June 2020 under the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended by the Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 2) Order 2016. However, the site lies within 3km of RAF Northolt and consultation was carried out with the air base. Due to the timescales associated with the GPDO application, the application was withdrawn. In addition, it transpired that part of the proposed telecommunications equipment (cabinets) may have infringed upon an adjacent garden entrance, albeit, further investigations have revealed the entrance is redundant. Nevertheless, a minor amendment to the position of the cabinets has been made, while the proposed height of the telecommunications pole has been reduced.

Consultation has since been completed with RAF Northolt and this document forms part of a re-submission.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:

Red

Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss the development proposal and identify any site-specific issues. At the pre-application stage, the site was given an amber rating under the Traffic Light Model. However, as the site is located on the very edge of Eastcote Village Conservation Area, this status has been changed to red.

Summary of outcome/Main issues raised:

Determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015.

A new 20-metre high H3G Phase 8 Streetpole is considered appropriate and should reduce any visual impact within the residential setting. As a consequence, H3G consider a 'Streetworks' installation positioned upon the adopted highway (footpath), is best suited to extend high-speed mobile coverage to the target community.

School/College

Location of site in relation to school/college:

There are no schools in close proximity to the site.

Outline of consultation carried out with school/college:

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?		Yes
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		Yes
Details of response: On 07 th July 2020, contact was made with RAF Northolt and details of the proposed telecommunications development (including drawings), were issued to the base via e-mail. A response was subsequently received from the Wing Commander at the base to confirm that RAF Northolt have no issues with the development. The response was received on the 14 th July 2020. A copy of the notice is included with this application.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	14 August 2020	

3. Proposed Development

The proposed site:

The proposed solution involves erecting a new 20m high H3G Phase 8 Streetpole installation upon the footpath adjacent to Bridle Road and Cheney Street, Eastcote, London, HA5 2TH (E 511217, N 188516).

The technical details of this proposal are illustrated within the enclosed application design drawings:- HGN12189_Planning_Rev A. It is recognised that the very nature of installing new 5G communications infrastructure within a dense urban setting requires a well-measured balance between the need to extend practical coverage with the risk of increasing visual intrusion.

Three are in the process of building the UK's fastest 5G network and has 140MHz of 5G spectrum (and 100MHz of it contiguous), which means our service will be much faster and shall have the ability to handle more data. In making this technology available to customers, H3G will need to provide a mix of upgrades involving existing sites and the building of new sites. New sites will be needed for many reasons, including the higher radio frequencies used for 5G, which do not travel as far as those frequencies currently in use and that sometimes not all existing sites can be upgraded.

The search process involved an initial 'desk-top' survey to ascertain and identify major constraints and impediments, followed by a physical search of the area. As with all 5G cells, this is an extremely constrained cell search area and options within the area are extremely limited. Nevertheless, the most viable solution that minimises amenity issues, has been put forward. In this instance, the proposed installation will be very carefully set alongside existing street furniture and adjacent to a backdrop of trees, which should provide further screening.

It should be noted that the nature of 5G and the network services it provides, means the equipment and antennas required are quite different to the previous, and existing, service requirements. In particular, the nature of the antennas, and the separation required from other items of associated equipment, is such that it cannot utilise certain structures that provide an installation for another operator, most notably in a street works or highways environment.

The site selection process has also been influenced by the numerous vertical elements of street furniture distributed around the vicinity of the site, including street lighting columns and trees. The height of the pole has been kept to an absolute minimum, allowing the installation to provide this essential new 5G coverage to the intended target area. The site has been selected on an area of pavement and in a position that will not impede pedestrian flow or the safety of passing motorists. The cabinets will be located at the base of the new pole.

The equipment is considered unlikely to have any material impact on the local area, however it should bring significant connectivity improvements, which is a material consideration in the judgment of the site suitability.

In this location, existing base stations are not capable of supporting additional equipment to extend coverage across the target area and prospective 'in-fill' mast sites are extremely limited. Other sites have been identified and subsequently discounted (Refer to Section 6, Figure 3). Notwithstanding, there is an acute need for a new telecommunications installation to deliver the required community coverage. A detailed site evaluation, together with a review of pre-consultation comments in line with Pt 1.11 of the Unitary Development Plan and Policy BE37 of the Local Plan, have helped shape this application.

Figure 1 - Site Photograph



The location is considered most appropriate in terms of extending 5G service across the target area 'coverage hole' and achieving the operational requirements of H3G, while minimising any visual impact upon the immediate and wider area. Furthermore, the equipment (including pole) will be coated with a non-reflective grey paint (RAL7035), to blend in with the existing street lighting poles on Bridle Road and Cheney Street. Please note, the height of the pole has been kept to an absolute minimum.

Planning Policy Relevant to the Development Site:

Local Planning Authority: Hillingdon Council

Local Plan: Pt 1.11 of the Unitary Development Plan and BE37 – Telecommunications developments – siting and design of the Local Plan (adopted November 2012).

The Adopted Roads Register shows that the proposed location falls within adopted Highway.

In this instance, a new 20m high H3G Phase 8 Streetpole with associated 3no. equipment cabinets (colour Grey RAL7035) are to be positioned upon the adopted public footpath, to reduce visual impact within the immediate and wider area. Consequently, the proposed site location is not considered to pose an unduly onerous material consideration and favourable determination is invited.

The National Planning Policy Framework (NPPF) section of this Supporting Statement goes into detailed analysis of why this site is in compliance with the NPPF.

Policy Analysis:

The Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 124) of the National Planning Policy Framework. It states:

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

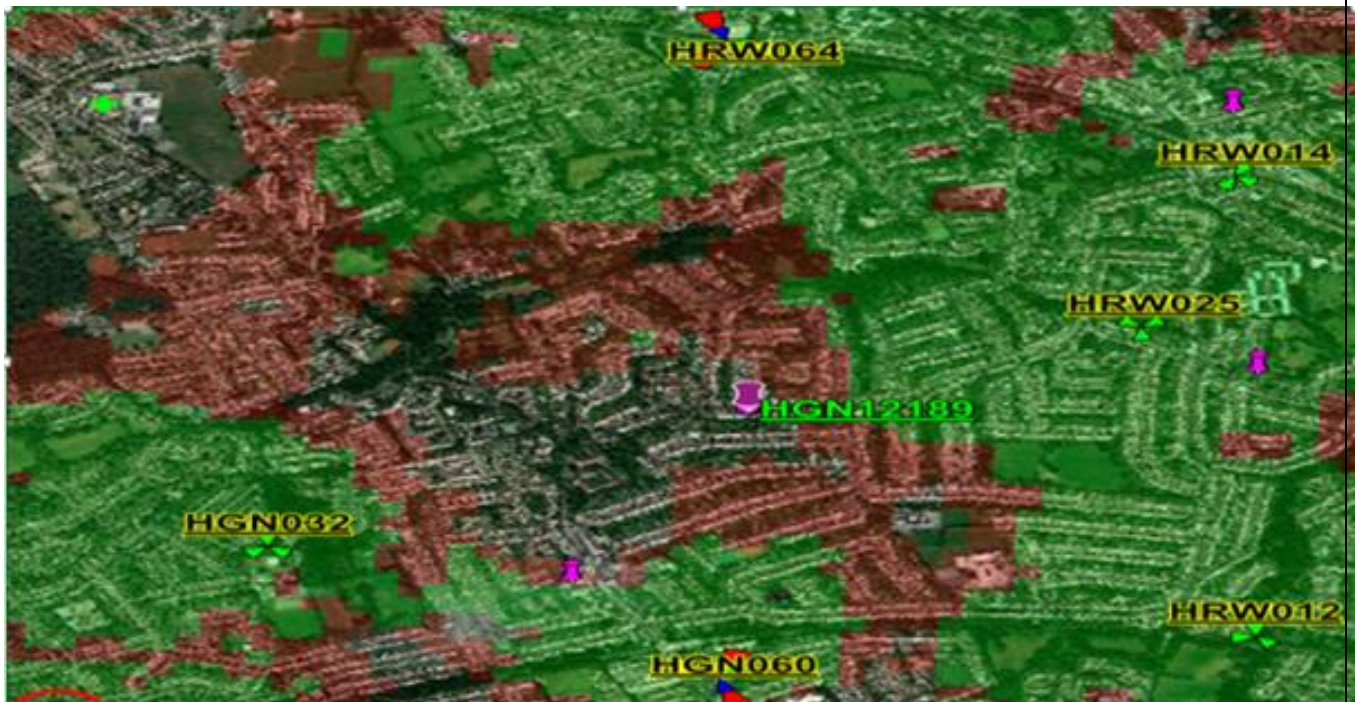
In keeping with the National Planning Policy Framework (NPPF) guidelines of using: “high quality communications” (Section 10), the proposed design has been selected to minimise visual impact upon the streetscape by integrating with the existing built environment.

The design of the proposed antennae and ground-based cabinets are assessed as being the least visually intrusive option available. Whilst it is accepted that there will be a localised visual increase through the installation of additional apparatus, it is considered that this will not overly detract from the character of the existing streetscape.

Enclosed map showing the cell centre and adjoining cells:

The optimum solution from the perspective of cell planning and radio coverage has been put forward. The target Search Area (shown as HGN12189) and existing H3G (Three) UK sites are illustrated within Figure 2 below:

Figure 2 - Coverage Map: Proposed installation must be located close to reference HGN12189



Type of Structure	
Description:	
Proposed Phase 8 Monopole c/w wrapround Cabinet at base.	
Overall Height:	20m AGL
Height of existing building	N/a
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Tower/mast etc. - type of material and external colour:	Phase 8 Monopole, colour Grey RAL7035
Equipment housing - type of material and external colour:	Profile steel cladding, colour Grey RAL7035

Reasons for choice of design:
The proposed installation is an H3G LTE (Three) Phase 8 Monopole which will facilitate educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home, as well as enjoying access to social, media and gaming for leisure time activities. In accordance with the requirement set within National Planning Policy Framework (NPPF July 2018) guidelines; the proposed 'Streetworks' design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture, having similar vertical emphasis and general overall appearance to street lighting columns in the urban setting.

4. Technical Information

ICNIRP Declaration attached ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). Public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on the site are taken into account.	Yes	
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5. Technical Justification

Reason(s) why site required

The National Planning Policy Framework (NPPF) clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this, the Applicant considers it to be important to explain the positive technical justification for the site and how the facility fits into the overall network.

The site is required to provide new 5G coverage for H3G LTE in order to improve service in and around Bridle Road and within the Eastcote area. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 50m meaning that it would not be feasible to site the column outside of this target locale (Refer to Figure 3).

6. Site Selection Process – alternative sites considered and not chosen

Discounted Options

In accordance with the sequential approach outlined in the NPPF, the following search criteria have been adopted. Firstly, consideration is always given to sharing any existing telecommunication structures in the immediate area, secondly; consideration is then given to utilising any suitable existing structures or buildings and thirdly, sites for freestanding ground-based installations are investigated.

This sequential approach is outlined below:

- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPPF, all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Mast Data register is always examined prior to the submission of a planning application.

Discounted Options and National Planning Policy:

The National Planning Policy Framework (NPPF) is clear that LPAs should not question the need for the installation under Part 116:

“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure”.

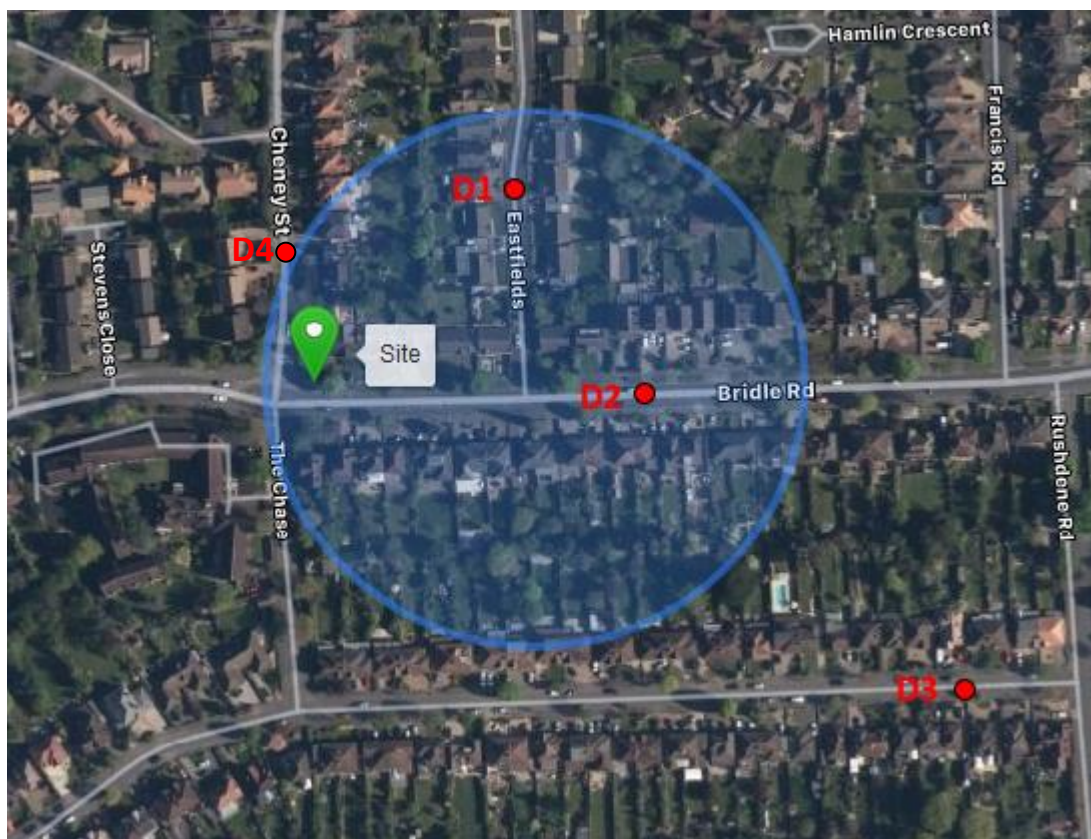
Typical to most 5G cell site deployment within the urban environment, this is an extremely constrained cell search area. It is recognised that the very nature of installing new 5G mast infrastructure within a dense urban setting requires a well-considered balance between the need to extend practical coverage with that of increasing risk of visual intrusion. A Streetpole with associated cabinets is deemed to be the only and most appropriate solution available. The DSA (Designated Search Area) is illustrated in Figure 3, together with site locations that were investigated and subsequently discounted.

Discounted Options:

D1 Eastfields	E 511290, N 188590	The pavements along Eastfields are particularly narrow, while they also contain a number of dropped kerbs, allowing driveway access to the residential properties throughout the street. As a consequence, no suitable locations could be identified for a new telecommunications installation.
D2 Bridle Road (East of Cheney Street)	E 511254, N 188511	Notwithstanding the application site, Bridle Road is densely residential and a number of houses look directly onto the street. As a consequence, the decision was made to site the installation on the corner of Bridle Road and Cheney Street, so it would not be within direct view of those properties. Furthermore, there is evidence of scarring along large parts of the pavement with manhole covers on many of the grass verges, which would suggest the presence of underground services. There are also overhead cables running across the south side of the road, limiting the potential to site a telecommunications pole of this nature.
D3 Roads to South of Target/Search Area	E 511456, N 188409	Roads to the south of application site are more than 200 metres from the nominal (centre of target/search area). Furthermore, the streets typically contain a number of dropped kerbs, allowing driveway access to residential properties, while there is also significant roadside parking. As a consequence, no suitable locations could be identified for a new telecommunications installation.
D4 Cheney Street	E 511203, N 188595	Cheney Street is densely residential and a number of houses look directly onto the street. As a consequence, the decision was made to site the installation on the corner of Bridle Road and Cheney Street, so it would not be within direct view of those properties. Furthermore, the verges and pavements include a number of dropped kerbs, allowing access to the residential properties along the street. As a consequence, no suitable locations could be identified for a new telecommunications installation.

D5 Existing Telecommunications Infrastructure	N/a	Existing mast infrastructure approx. 1.4km north, 0.7km north-east, 1km south-east, 0.9km south and 2km south-west (see Fig. 2) are not capable of hosting additional equipment which is capable of providing coverage into the target area. As a consequence, the sites have been discounted.
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Figure 3 - Proposed Site Location: 100m DSA (Desired Search Area) shown circled



7. Additional Relevant Information

Background to the Proposal

H3G supports Government ambition to be a global leader in the next generation of mobile technology set out within its March 2017 white paper, 'Next Generation Mobile Technologies: A 5G strategy for the UK' and expand its mobile network across the City of London and specifically in this instance, to enhance 5G coverage levels within the Eastcote area.

Modern mobile phone base stations operate on a low power and accordingly, need to be located within close proximity to the areas they are required to serve. Increasingly, people are also using mobile devices in the home which requires the installation of base station infrastructure closer to such residential areas.

The proposed scheme has been designed to ensure the fundamental principles of good siting and appearance are adhered to. The overall impact of the installation on the environment is therefore considered limited when viewed in the context that high-speed mobile connectivity is the lifeblood of a Community.

DEVELOPMENT PLAN POLICY:

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, stated that:

“Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise.”

NATIONAL PLANNING POLICY:

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF July 2018) sets out the Government's planning policies for England and how these are expected to be applied at the Local level. It provides a framework within which local people and their representative Councils can shape distinctive local and neighbourhood plans, which reflect the needs and priorities of their own communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including;

- Economic Role - contributing to building strong, responsive and competitive economy;
- Social Role - Supporting strong vibrant and healthy communities; and
- Environmental Role - Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. The NPPF recognises the vital importance of high-quality telecommunications and dedicates a whole chapter to this area. Chapter 10 of the NPPF outlines the Governments support for high quality communications. The paragraph extracts highlighted below, clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 112 states:

“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).”

It continues in Paragraph 113

“The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, 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.”

Operators always follow the sequential site selection process. Where an existing site can be shared or upgraded, this will always be adhered to before a new installation is put forward for consideration. In this instance, there is no scope to upgrade existing infrastructure or site share with other operators.

The support for telecoms and the need not to constrain Operators is laid out in Paragraph 116

“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.”

Conclusion

Government considers that high-speed mobile connectivity is the lifeblood of a Community. H3G (Three) is committed to providing improved network coverage and capacity, most notably in relation to 5G services.

Taking into account the site-specific factors and technical constraints, available options and planning constraints, it is considered that the proposed site and design clearly represents the optimum environmental solution to extend coverage to the target Community.

The use of the public highway to accommodate a new telecommunications installation complies with both central government and local planning policy guidance, where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community, while minimising visual impact.

While we recognise the site is situated on the edge of a conservation area, considerable care has been taken with regards to sensitively siting the installation against a backdrop of trees. Furthermore, in accordance with a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the National Planning Policy Framework, along with the Council's Unitary Development Plan and Local Plan (Policy BE37). The development is also considered to comply with Policy 4.11 – Encouraging a Connected Economy, as detailed within The Mayor of London 'The London Plan' (March 2016), particularly in respect of improving and enhancing communications within this part of the city, with communications viewed as a vital ingredient for continued economic prosperity and social inclusion.

On this basis, favourable determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015.

Contact Details

Name: (Agent)	Chris Weir BSc (Hons), MRICS	Telephone:	07450 982 496
Operator:	H3G	Fax no:	N/A
Address:	Dot Surveying, The Bonds (Suite 31), 2 Anderson Place, Edinburgh EH6 5NP	Email Address:	c.weir@dotsurveying.co.uk
Signed:		Date:	14 th August 2020
Position:	Senior Surveyor	Company:	Dot Surveying
		(on behalf of above operator)	