

**5G SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION
STATEMENT PREPARED BY DOT SURVEYING**

1. Site Details

Site Name:	Appledore Avenue Streetworks	Site Address:	Appledore Avenue, Eastcote, London Borough of Hillingdon HA4 0TD
NGR:	E: 510989 N: 186274		
Site Ref Number:	HGN12188	Site Type:	Proposed 5G telecoms installation: 18m high Streetpole and 3no. Cabinets with ancillary works.

2. Pre-Application Check List

Site Selection

Was the London Borough of Hillingdon 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:	7 th July 2020
Name of contact:	Local Planning Authority and Ward Members – by 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.

Consultation has invited comments within a 2-week period and whilst the merits of high-speed telecommunications are generally recognised; pre-application has identified the need to carefully consider risk of increased visual amenity intrusion to adjoining residential properties through such urban mast setting.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:

AMBER

Prior to the submission of this application the applicant-initiated pre-consultation with the local planning authority. This provides an opportunity to discuss development proposals and identify site specific issues.

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.

Proposed mast design has been reviewed in line with any pre-consultation feedback and measures taken to adopt 20m high H3G Phase 8 Streetpole with appropriate colour/finishes to reduce visual impact in a residential setting located out with conservation area or other such restrictive designation.

H3G proposed 'Streetworks' installation located within the adopted Highway footpath is considered best suited to extend high-speed mobile coverage to the target community.

School/College

Location of site in relation to school/college:

A review of available online mapping shows that the proposed site of the mast is not located close any schools or colleges.

Outline of consultation carried out with school/college:

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? (Strike through as appropriate)		Yes
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		Yes
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	16/07/2020	

3. Proposed Development

The proposed site: The cell search area for this mast is focussed on the area of Appledore Avenue, Torcross Road and Bideford Road, Eastcote. The proposed site is located at Appledore Avenue, London Borough of Hillingdon, HA4 0TD. There is now a requirement to upgrade the UK H3G (Three) network to provide improved coverage and capacity, most notably in relation to 5G services. This proposal is for a 18m SW (Street Works) monopole, cabinets and ancillary works to be located on an area of amenity grass off the pavement at Appledore Avenue, Eastcote. The exact details of this proposal are illustrated on the enclosed drawings (Ref HGN12188_PLANNING_REV_A) Proposed Phase 8 Monopole C/W wrapround Cabinet at base & associated ancillary works). As with all 5G cells this is an extremely constrained cell search area. Options are extremely limited and the only viable solution that minimises amenity issues has been put forward. The search process undertaken involved an initial 'desk-top' survey to ascertain and identify major constraints and impediments. Further, and, importantly, a site visit to the search area identified was undertaken. From this work we looked at several potential locations, for some sites this has proven to be very challenging. Where practicable and relevant we have provided details of discounted sites. Three are in the process of building out the UK's fastest 5G network. Three has 140MHz of 5G spectrum (and 100MHz of it contiguous), which means our service will be much faster and able to handle more data. To bring this new technology to the people H3G will need to provide a mix of upgrades to existing sites and the building of new sites. New sites will be needed for many reasons, including that the higher radio frequencies used for 5G do not travel as far as those frequencies currently in use and that sometimes not all existing sites can be upgraded. In this area there is an acute need for a new mast to deliver the above. This site is located on a grassed, triangular shaped parcel of land located off Appledore Avenue. The search area is located within a densely developed predominately residential area. The list of streets shows that the pavement here is adopted.

It should be noted however, 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 some existing 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. The height of the pole has been kept down to the absolute minimum capable of providing the required essential new 5G coverage. The site has been selected on a piece of amenity grass off the pavement serving the highway in a position that will not impede pedestrian flow or the safety of passing motorists. The cabinets are located at the base of the new pole and, unless the site is located in Article 2 (3) land, these are PD without Prior Approval and do not form part of the proposal from a planning consideration perspective.

This equipment is considered unlikely to have any material impact on the local area, but significant connectivity improvements, which is a material consideration in the judgment of the site's suitability. The cell search area was assessed at the Survey stage from a planning and residential amenity perspective. The planning constraints (where there are any) have shaped the location of the proposal. The planning analysis and overview of the sites planning designation is captured below. Figure 1 – Figure 3 illustrates the site and the surrounding area.

Figure 1 – Site Photograph's

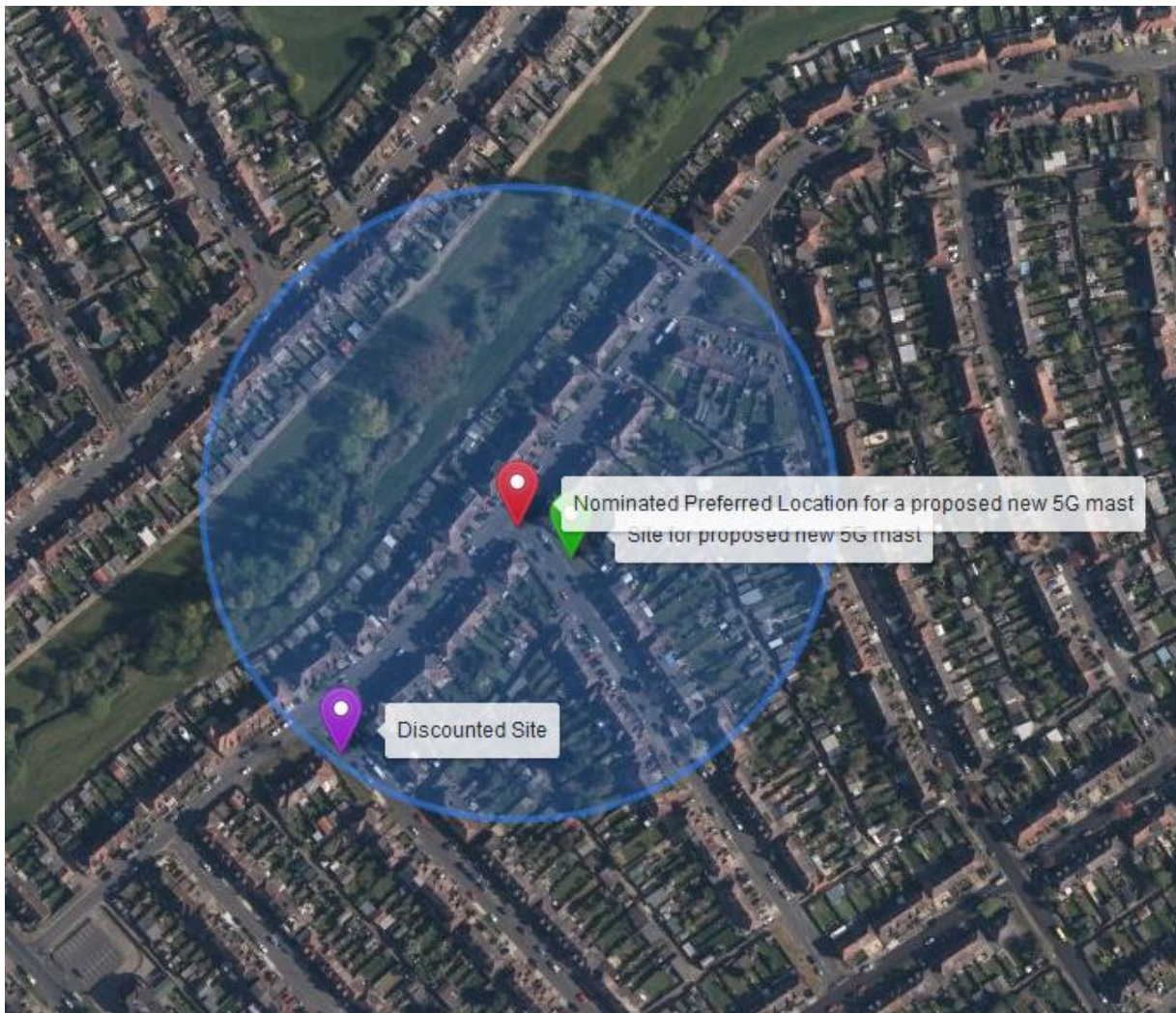


The proposed site option is considered the best available compromise between extending 5G service coverage across the target 'coverage hole' within the selected Streetworks mast height and associated antenna and ground-based cabinets restricted to the absolute minimum capable of providing the required essential coverage.

Figure 2 – Coverage Map: Proposed installation must be located close to the pink dot



Figure 3 – Identified site (marked green); Nominal Preferred Location and discounted site marked up



Policy Analysis:

Local Planning Authority: Hillingdon Council

Development Plan: The current Local Plan covering the site is the London Borough of Hillingdon Local Plan Part 1 – Strategic Policies (formerly Core Strategy). This was adopted on 8th November 2012. The Hillingdon Local Plan Part 1 – Strategic Policies sets out the vision, objectives, spatial development strategy and overarching policies that will guide development in the Borough to 2026.

Site and its surrounds**Policy Relevant to the Development Site:**

From a review of the Adopted Local Plan there does not appear to be any policies specifically in relation to telecommunications development. The location of the site is not considered to be a material consideration.

We do however note and acknowledge the general principles of the Core Strategy and Harrow's Spatial Vision and continued growth and regeneration ambitions. We consider that the roll out of 5G is in keeping with the aspirations of the London Borough of Hillingdon.

The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with the NPPF.

Policy Analysis:

Local Plan / Supplementary Planning Guidance (where applicable)

It is considered that the application is in accordance with the relevant Local Plan Policy.

The applicant has certified that the development will operate within the International (ICNIRP) Guidelines for public exposure.

The development proposed at the site seeks to minimise its visual effect by being located on an existing area of amenity grass which does not directly impact on residential properties, as well as the monopole assimilating with other vertical street furniture items in the vicinity, so ensuring the level noticeable visual change is minimal, yet ensure improved delivery of service (to accord with other Development Plan policies), so ensuring accordance with this policy and continued preservation of setting of the area. The proposal fully accords with the requirements of the NPPF.

The proposed works are not to the visual detriment of the surrounding area (being suitably distant from sensitive receptors). The proposal would not result in demonstrable harm to the character of the immediate or wider area but are vitally necessary to ensure improved delivery of service. Capacity and coverage are the key drivers for this new 5G installation. The proposal would respect and continue to maintain the character of the area, would be suitably distant from potentially sensitive users, and so would accord with the principles of the Development Plan policies. It fully accords with the requirements of the NPPF.

Central 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 street scene by integrating with the existing built environment.

The design of the proposed equipment is considered to be the least visually intrusive option available. Although it is accepted that there will be an intensification in the amount of equipment (an additional monopole and associated cabinets in the area) it is felt that such a minor increase would not detract from the character in which the proposal sits.

Enclose map showing the cell centre and adjoining cells:

There is an extremely small constrained search area for this cell. Details of the cell search area and the existing sites in the immediate vicinity are provided within this report. Often the proposal has been pulled marginally outside of the cell search area due to residential amenity, pavement width, underground services and planning issues. The mast must be in a position where it can be physically constructed. Existing underground services continue to be a significant obstacle to the deployment of this roll out. The optimum solution from a planning and radio coverage perspective has been put forward.

Figure 2 illustrates the nominal and existing 3 UK sites in the area. The nominal is captured by the pink dot. The equipment has to be located in this pink dot or very close to it to give coverage and not to interfere with the adjoining 3UK sites.

Type of Structure

Description: **PLEASE SEE DRAWINGS SUBMITTED REF HGN12188_PLANNING_REV_A**

Proposed Phase 8 Monopole C/W wrapround Cabinet at base.

Overall Height: +18.0m 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:

Proposed Phase 8 Monopole C/W wrapround Cabinet at base.

Equipment housing – type of material and external colour:

Steel – Grey

Reasons for choice of design:

The proposed installation is an H3G LTE (Three) Phase 8 Monopole which will house H3G LTE (Three). The proposal is required due to acute capacity issues and will facilitate significantly improved 5G in areas that have started to gain this service and newly introduce it to the areas that have not gained this level of connectivity yet.

In keeping with the National Planning Policy Framework (NPPF July 2018) guidelines of using high quality communications infrastructure the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing street furniture, having similar vertical lines and overall appearance to the numerous street lighting columns in this area.

The 5G antennas are some 3 times as heavy as previous antennas, while the associated Remote Radio Units also now need to be placed at the top of the pole, thus many street works designs are no longer structurally capable of hosting all the equipment of 2 operators. It should be noted that the alternative option that could accommodate both operators (EE and H3G LTE who have a site sharing agreement) would be a more traditional 'greenfield' mast, with an open headframe and more bulky design, which would be inappropriate in a street scene location. There is no such location in this cell search area where a greenfield mast could be housed and thus site sharing is not a viable proposition.

4. Technical Information

ICNIRP Declaration attached	Yes	
ICNIRP 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.		

5. Technical Justification

Reason(s) why site required
The National Planning Policy Framework clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the 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 coverage in this area of Harrow. 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 locale.

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

Discounted Options

In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF) following search criteria have been utilised. Firstly, consideration is always given to sharing any existing telecommunication structures in the 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 Ofcom Site Finder mast register is always examined prior to the submission of an application.

DISCOUNTED OPTIONS:

The NPPF is clear that LPAs should not question the need for the installation.

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.

The cell search area is illustrated on Figure 3 and is extremely constrained. The best option has been put forward. As with all 5G cells this is an extremely constrained cell search area. Options are extremely limited and the only viable solution that minimises amenity issues has been put forward. The proposed site is located in a densely packed residential area. The DSA (Designated Search Area) covers this densely packed residential area. There is no scope to pull the mast outside of this area and give the cell 5G coverage.

Discounted Options:

Figure 3 contained within this report shows a map which illustrates the potential sites which was investigated and discounted. See also photos of this potential site which was discounted.

Within 100m of the nominal point there are 2 roads:

- 1.) Torcross Road - Residential, lots of overhead power cables and narrow pavements with scarring.**
- 2.) Appledore Avenue - residential, on pavement parking throughout the street, with small areas free (option 1) Spanning just out of 100m radius of the nominal there are more residential roads:**
- 3.) Bideford Road - wider pavements but lots of scarring and existing furniture.**

- 4.) Hartland Drive - Residential, overhead power lines and driveways render location unsuitable.
- 5.) Victoria Road - Main road, good locations to the north but 250m away from the nominal, with many of the suitable pavement locations having existing furniture and trees tall trees blocking coverage to the south
- 6.) Barnstaple Road - Residential, on pavement parking and driveways make it unsuitable.

Discounted Option located on Bideford Road



7. Additional Relevant Information

Background to the Proposal

This specific proposal forms part of an integral requirement for H3G LTE to expand its 5G telecommunications network across Hillingdon, specifically in this instance to enhance 5G coverage levels and network capacity within the area.

Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using their mobiles in their homes and this means we need to position base stations in, or close to, residential areas.

A further limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However, if this overlap is too great unacceptable interference is created between the two cells.

Siting

We have considered the detailed siting and design carefully to ensure that the scheme has a limited impact on the locality and general visual amenity.

The mast subject to this application is located within an industrial estate and therefore will have no detrimental impact upon any residential amenity or indeed the appearance of the surrounding area.

Visual appearance

We would repeat that we have carefully placed and designed the scheme to ensure the principles of good siting and appearance are adhered to. The overall impact of the installation on the environment is limited.

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, it is 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 accountable Councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their 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. Chapter 10 of the NPPF outlines the Governments support for high quality communications. The paragraphs 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 adhered to before a new proposal is put forward for consideration. In this instance there is no scope to upgrade an existing mast nor site share. The only solution is to

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

We consider that the development is compliant with the London Borough of Hillingdon’s planning policy and that in accordance with Section 38 (6) of the Planning and Compensation Act 2004 permission should be granted for the installation.

We consider the development 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.

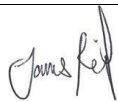
Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

On the basis of a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the requirements of the National Planning Policy Framework and Council’s Local Plan Policies.

Contact Details

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	<u>EH6 5NP</u>		

Signed:



Date:

16/07/2020

Position:

Head of Planning

Company:

(on behalf of above
operator)
