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Site Specific Supplementary Information Document

Planning for Freshwave Facilities Limited
16th of May 2023

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Contents

1 SITE DETAILS

Site Name:	West Drayton	**Site Address:**	WEST DRAYTON SSTN MILL ROAD WEST DRAYTON MIDDLESEX UB7 7EQ
Site Reference:	1643308	**Site Type**	Macro
National Grid Number:	505626, 179192		

2 PRE-APPLICATION CHECKLIST

2.1 Site Selection (For New Sites Only)

2.1.1 (Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	**No**
If no explain why: The Local Planning Authority's planning database was searched in the absence of a mast register.		
Were industry site databases checked for suitable sites by the operator:	**Yes**	No
If no explain why:		

2.2 Site Specific Pre-Application consultation with local planning authority

Was there Pre-Application contact:	**No**
Date of Pre-Application contact:	N/A
Name of contact:	N/A

2.3 Community Consultation

Rating of Site Under Traffic Light Model	Red	**Amber**	Green
Outline of consultation carried out: The proposal was rated Amber in accordance with the traffic light consultation model in the Code of Best Practice on Mobile Network Development (published March 2022). Consultation has been issued to the Councillors associated with the Ward in which the site is located on the 29th of March. A nearby school was also contacted on the 29th of March. Adjacent residents were contacted regarding the proposal also.			
Summary of outcome/main issues raised (include copies of relevant correspondence): A consultation response had not been received at the time of writing. Lines of communication will remain open throughout the application process. Should representations be received during the course of the application, these will be made known to the Local Planning Authority.			

2.4 School College

Location of site in relation to school/college (include name of school/college): A search of publicly available Department for Education and Ofsted records identified one educational facilities being within 500m of the site location. This included St Martin's CE Primary School
Outline of consultation carried out with school/college (include evidence of consultation): The identified schools were consulted on the 29th of March 2023.
Summary of outcome/main issues raised (include copies of main correspondence): A consultation response had not been received at the time of writing. Lines of communication will remain open throughout the application process. Should representations be received during the course of the application, these will be made known to the Local Planning Authority.

2.5 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	**No**
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	**No**
Details of response: N/A		

2.6 Developers Notice

Copy of Developer's Notice enclosed?	**Yes**	No
Date served: 16.04.2023		

3 PROPOSED DEVELOPMENT

3.1 The Proposed Site

3.1.1 As part of EEs and Three UKs continued network improvement and maintenance program, there is a specific requirement for an installation at this location to maintain the latest 5G services, as well as improvements to the existing 5G, 3G and 4G services, ensuring that this area of West Drayton and surrounding areas maintains access to the latest technologies as per the Operator's license and customer obligations, as well as future proofing the capacity of the existing NTQ telecommunication site.

3.1.2 This specific requirement at this site is due to a nearby existing telecommunication site, located at Bardon Aggregates Thorney, Mill Road, West Drayton, UB7 7EZ, receiving a Notice to Quit notification due to the closure of the existing site area. Therefore, this site aims to replace and upgrade the service which the NTQ site provided to the West Drayton area. Without this proposed replacement site, the residents, businesses and visitors to the West Drayton area mobile networks will receive a degraded network service.

3.1.3 The application site is situated on the northwest boundary of the Esso garage located on Mill Road, West Drayton, as indicated by Figure 1. The proposal will be positioned towards the eastern boundary of the site. The site is accessed via Mill Close and Mill Road. Additionally, the site benefits from the context of some existing street furniture by way of streetlighting columns, telegraph poles, and traffic lights. The proposed structure, although taller than most surrounding existing elements, would only be seen from relatively proximity due to the angled nature of the roads entering the intersection. The site is located within the West Drayton Green Conservation Area.

3.1.4 The site is also set back from the pedestrian walkway and therefore is not visible along the majority of Mill Road or Mill Close.

3.1.5 The proposal sits on the border of the suburban area of West Drayton, meaning the surrounding area nearby the Esso Garage is primarily residential. Immediately to the east of the application site lies Mill Close, and to the west along the boundary lies residential dwellings. The area north of the site is predominantly suburban, characterised semi-detached housing. The south of the site is occupied by the Shell Garage and its associated infrastructure, with Mill Road being located here also.

Figure 1: Aerial view of the proposed application site (Image Source: Google)

3.1.6 This planning applications requirement aims to replace the existing NTQ site telecommunication development located in West Drayton, in order to provide the existing and enhanced coverage for the surrounding area. This will provide, enhance and futureproof EEs and Three UKs coverage in the local area for years to come by providing 5G, whilst improving the existing 4G and 3G services. This will be done by installing a replacement 20m mast, comprising 12no. upgraded antenna apertures and other ancillary works on the application site.

3.1.7 The proposed slimline pole design will look utilitarian and regular in appearance and reflect its function of providing a service to this area. It is considered that the overall character of the development should therefore be limited to what is acceptable in the locality and over time should become an accepted feature as with other forms of communication development located on street scenes. The site should bring significant connectivity improvements, which is a material consideration in the judgment of the site suitability.

3.2 Type of Structure

Description

3.2.1 The proposed development will comprise the following:

- Proposed 20m Phase 7 Pole on a new D9 Root Foundation with wrap round cabinet (0.4m from fence).
- 12no. Antennas located on 4 apertures; and
- 3no. cabinet (0.4m from fence).

Antenna			
Antenna ID	Bearing in Degrees	Antenna Height	Antenna size (Height)
A1	0°	19.55m	795mm
A1	0°	18.26m	795mm
A2	0°	16.61m	1500mm
A3	0°	14.61m	1500mm
B1	120°	19.55m	795mm
B1	120°	18.26m	795mm
B2	120°	16.61m	1500mm
B3	120°	14.61m	1500mm
C1	240°	19.55m	795mm
	240°	18.2m	795mm
C2	240°	16.61m	1500mm
C3	240°	14.61m	1500mm

Model	Dimensions (WxDxH) (M)	Location	Colour
Meter Cab	790x385x1300	Base / Ground	RAL 7035
MK 5b Link AC Cab	1100x500x1500	Base / Ground	RAL 7035
ERS 6130 H3G Cab	640x480x1225	Base / Ground	RAL 7035
Bowler H3G	1900x660x1827	Base / Ground	RAL 7035

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

3.2.2 The mast will comprise a 20m phase 7 pole with RAL 7035 finish.

Equipment housing – type of material and external colour

3.2.3 The equipment housing will be of RAL 7035 finish.

3.3 Reasons for choice of design, making reference to pre-application responses

3.3.1 The equipment layout and design are based on the principle of meeting the existing and future operational requirements of the former NTQ telecommunication development, which the proposed development is replacing, whilst minimising the impact on the visual and residential amenity of the surrounding area, as far as practicable. The proposal design and height are therefore needed to prevent any future capacity issues, by providing 5G, and improved 4G and 3G services to the surrounding areas.

3.3.2 The antennas must be allowed to unrestrictedly emit a radio signal meaning they need to be sited at a high position at the top of the mast to help the radio signal clear surrounding structures, such as buildings and trees, with the aim of avoiding signal interference. The radio frequencies that 5G operates at is particularly sensitive to interference from solid objects which necessitates elevating the antennas at the height proposed. It is therefore imperative that good existing network coverage is established by these new installations.

3.3.3 Therefore, the objective of this site is to ensure that the coverage and capacity to the surrounding area is enhanced and maintained for the West Drayton and surrounding area residents, visitors and businesses.

3.3.4 The objective, and need, for new telecommunications infrastructure in this area is henceforth established and justified further in Section 4 of this document. Section 5 further justifies why the proposal site is the best suited for the placement of a telecommunications site.

3.3.5 By way of background information, in designing a radio base station it is necessary to incorporate certain vital elements and to works around a number of technical constraints. There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signal(s), the supporting structure that holds the antennas in the air (or fixes them to a building or structure) and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units).

3.3.6 Other elements necessary for the base station to function are the power source (a meter in a cabinet or a generator on sites where an REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas, link dishes and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

3.3.7 The base-station has been designed to accommodate replacement apparatus, allowing provision of 3G and 4G mobile connections to the surrounding area to continue. It has also been designed to accommodate new 5G technology, introducing ultra-fast mobile connectivity capable of operating the ‘Internet of Things’. This upgraded and replacement infrastructure will provide higher mobile down-load speeds and more reliable, quicker phone connections.

3.3.8 There would be increased capacity to provide services to a higher number of people, all at the same time. The technical requirements of mobile communication operators such as EE and Three Mobile are acknowledged in the National Planning Policy Framework which states that local planning authorities should support electronic communications networks and their provision, including telecommunications and high-speed broadband.

3.3.9 Whilst the proposed colour scheme is considered wholly appropriate for this site, the applicant would be willing to adhere to any colour scheme deemed more appropriate by the local authority and would like the opportunity to discuss this with the local authority during the course of the application process should this be the case.

3.4 Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)

International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, EE and Three Mobile operate their network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of the EE and Three Mobile networks, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. 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.	Yes	No

4 TECHNICAL JUSTIFICATION

4.1 Reason(s) why site required e.g., coverage, upgrade, capacity

4.1.1 The principle aim of the proposal is to replace, whilst upgrading, the existing NTQ site mentioned previously at Thorney Mill Road, West Drayton, UB7 7EZ. This will maintain and improve EE and Three Mobile communications coverage across the local area in order to maintain that the strict coverage qualities of the operator are met for the future. Due to the existing telecommunication development located nearby, the proposed area is the most appropriate location for new telecommunications infrastructure. If a new site is not developed before the NTQ site is decommissioned, then the local residents current mobile significantly affected.

4.1.2 As stated, the installation would also provide improved 5G services for EEs and Three Mobiles Networks, introducing ultra-fast mobile connectivity capable of operating the 'Internet of Things'. This new infrastructure will provide much higher mobile down-load speeds and more reliable, quicker phone connections.

4.1.3 Importantly, the proposal would provide increased network capacity, allowing quality service provision to a higher number of people at the same time. Improving cellular connectivity is led largely by demand. The very high level of mobile phone use in the UK requires the installation of additional base stations to provide the necessary connections.

4.1.4 The National Planning Policy Framework makes it clear that authorities should not question the operators service's necessity or try to stop operators from competing with one another. Despite this, the Applicant believes that it is essential to explain the technical justification for the location and how the facility fits into the network as a whole.

4.2 Background information

4.2.1 Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion. As stated in Paragraph 114 of the NPPF '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) ...". The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal will assist in improving coverage, whilst also delivering new 5G to the surrounding area, working to achieve the NPPF objectives.

4.2.2 The mobile telecommunications network is considered critical infrastructure and is necessary for the day to day running of the country. The ability to access a reliable mobile communications network is recognised by central government as an essential part of everyday life. The application site seeks to boost local connectivity through the benefits of new technology.

4.2.3 The mobile telecommunications network is relied upon my many millions of users every day to enable them to carry out daily tasks such as working from home, accessing medical appointments and prescriptions, banking, socialising, contacting loved ones or the emergency services. This section looks at how the mobile phone network has become a crucial part of everyday life, even more so during and since the coronavirus pandemic.

4.3 Additional information on mobile phone usage

4.3.1 In Ofcom's Online Nation 2020 report - an annual report which presents data on internet usage - Ofcom states "Consumers are increasingly using services provided over the internet to communicate, including apps and websites such as WhatsApp, Facetime, Snapchat and Gmail. The use of online communication services has grown with increased mobile phone use, the availability of low-cost data plans and better connectivity, both within and outside the home—and more recently, as people have turned to online communications as a way of staying in touch during the lockdown."

4.3.2 In the same 2020 report, Ofcom detailed how usage changed during the coronavirus pandemic. "[Ofcom] research indicates that on a daily basis online adults are using WhatsApp for text messaging daily to a similar extent as SMS (40% vs. 41%), and since the imposition of measures related to the coronavirus, the use of video calling at least weekly has more than doubled (35% vs. 71%)."

4.3.3 The use of online communication services continues to grow, and evidence shows that consumers wish to access these services both at home and on the go. Since this area is currently under-serviced, it is essential that a new site is built and integrated into the network to enable consumers to access the services they require.

4.3.4 The application site will serve the existing users of Virgin Media and O2's networks, as well as the predicted increase in customers as usage continues to grow. It will serve the need for improved coverage and data transfer speeds resulting from the rapid growth of the number of people that now own and use mobile phones, including smart phones. 4G (also known as LTE) allows users of the network to benefit from ultra-fast speeds when browsing the internet, streaming videos, or sending emails wherever they are.

4.3.5 It also means faster downloads on the go. Ofcom's 2018 communications Market Report states that with future technologies, including 5G, "mobile data network connection speeds are expected to increase significantly, making a new generation of mobile services a reality and generating further demand for on-the-go data connectivity."

4.3.6 One of numerous benefits of reliable widespread connectivity, is that this allows for an increase in home working, by providing the opportunity to create a "virtual office", reducing the need to travel for work, which supports the sustainable development agenda. Home working has become the norm across many employment sectors over the last year and a half due to the pandemic and the government's appeal for people who can, to work from home.

4.3.7 The lockdown restrictions created a surge in online shopping and use of video conferencing facilities, which require a stable and fast data connection, many of these trends have remained despite the

restrictions easing. The Application Site's location near to a predominantly residential area, means that it is well positioned to facilitate the increased data usage via the internet, whilst also meeting the needs of nearby businesses who rely on good connectivity for day-to-day functioning and to maintain high productivity.

4.3.8 This site's optimal location tessellates with the existing cells in the area and will work with the existing cells to ensure that customers experience a smooth transition when moving between cell areas. Customers using surrounding transport routes in cars, buses or bikes, will benefit from the faster data speeds whether using online mapping systems, or streaming music and videos. The high-quality connectivity provided by the Application Site will work to achieve a seamless transition between cell areas and ensure that users experience a reliable service when travelling within the local area. Good connectivity on transport routes is beneficial for users, road users specifically may rely on internet mapping systems for navigation or for passengers using voice and data services for entertainment or other means.

4.3.9 As discussed later in this document and as recognised by the UK government, 5G promises increased possibilities for users, the increased speeds and low latency provides the potential for future application in ways not yet thought of. Huge advancements in autonomous machines and vehicles, medical devices, traffic management and more can be expected as access to 5G becomes ubiquitous.

4.3.10 At the 5G World Conference during 2019 London Tech week, the Digital Secretary Jeremy Wright said: “As part of our modern Industrial Strategy, we're making sure that Britain has a telecoms infrastructure that is fit for the future.”" He went on to elaborate: “5G is about more than mobile phone consumers having a fast and reliable connection anywhere in the country. It's a vital piece of technology that can be used to improve the productivity and growth of our industrial sectors. That's why we're excited to develop new trials in areas such as manufacturing and logistics that can really benefit from 5G."

4.3.11 The UK government's Digital Infrastructure Minister, Matt Warman delivered a speech at the Connected Britain conference on 23 September 2020, which endorses the nationwide roll-out of 5G and evidences the government's intention to promote “world class digital connectivity" within the UK. Warman states that the government is bringing legislation reform to make it easier to deploy mobile phone base stations and that there is a specific Barrier Busting taskforce to aid the industry in deploying the required infrastructure. Warman refers to the coronavirus pandemic and lockdown restrictions, during which good connectivity was crucial to everyday life; ensuring businesses could keep trading and maintaining contact between family and friends which boosted the nation's morale and well-being on an individual level. Warman credits the industry for “[keeping] school children connected with their teachers, allowed isolated grandparents to speak to their grandchildren, and enabled great British businesses to power the economy through these difficult times".

4.3.12 He goes on to recognise that the importance of connectivity is not limited to lockdown conditions, indeed he considers it vital for the nation's recovery, he states “the digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown - and is now more important than ever as we head into recovery".

4.3.13 The government are keen to see all areas of industry flourish and recognise the possibilities that improved connectivity, including 5G, could bring. This is shown in Warman's speech, when he says, “turning to 5G, while the commercial rollout of 5G continues at pace, we're pushing ahead with plans to make sure all sorts of industries benefit from this game-changing technology.” The government are investing huge sums in the 5G network and have pledged £30million to '5G Create' an opportunity for innovative new uses of 5G technology.

4.3.14 In 2019, Barclays released a report titled “5G: A transformative technology" which included projections of economic growth based on the uptake of 5G by businesses. The report included three scenarios, a pessimistic view, a central view and an optimistic view which considered the outcome of the development of a national 5G network at a slower rate, orderly pace, or faster uptake, respectively. The annual business revenue by 2025 was projected to increase by £8.3bn in the slowest scenario and by £15.7bn in the fastest scenario. This would add 101,300 extra jobs by 2030 in the slower paced uptake, and 171,900 additional jobs in the faster uptake. This is just one example of the huge economic advantage that a reliable, widespread 5G network could achieve. The proposed Application Site will form an integral part of the Network and works towards achieving economic growth for the UK economy.

4.3.15 It is our view that this proposal is exactly the type which the government is endorsing. These plans will work with the surrounding telecommunications infrastructure to ensure a good stable connection, even

as users transfer from one cell area to the next. The installation of this infrastructure will enable EE and Three Mobile to provide a better level of coverage to the local area, following the replacement the existing site. Customers will experience improvements in 2G, 3G and 4G coverage as well as new 5G technology, benefitting both voice and data services. The proposals will increase capacity by virtue of being a two-cell solution, as well as improving the resilience of the network in this area. The applicant has designed the site so as to have minimal aesthetic impact on the surrounding area and yet meet the coverage need.

5 SITE SELECTION PROCESS

5.1.1 Please see the following sites which were approached, with the reasoning behind the refusal to cooperate:

1) St. Georges Meadow, Mill Road, West Drayton UB7 7EQ – owned by National Trust – site owner unwilling to proceed with a cell site installation on this land.

2) Land Being Part Of The St Martins Road Estate, West Drayton UB7 7EQ – owned by London Borough of Hillingdon - site owner unwilling to proceed with a cell site installation on this land.

3) Land On The South-east Side Of Mill Road, Yiewsley UB7 7ES - owned by London Borough of Hillingdon - site owner unwilling to proceed with a cell site installation on this land.

4) The Burroughs Care Home, 85 Mill Road, West Drayton UB7 7EH - owned by Care UK - site owner unwilling to proceed with a cell site installation on this land.

If no alternative site options have been investigated, please explain why?

5.1.2 N/A.

5.2 Environmental information (refer to Section 2 of the Site Finder Report)

5.2.1 The site is located within West Drayton Green Conservation Area.

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

5.3.1 As set out earlier in this document a NTQ was issued to an existing site within the West Drayton area, therefore the proposal is necessary to maintain and improve the existing level of coverage, enhancing EEs and Three Mobiles services in the local area.

5.3.2 The application site is well suited to integrate with the surrounding cells to maintain and improve a blanket of good connectivity which seeks to serve the existing cohort of EE and Three Mobile customers. This section should be read in conjunction with the preceding sections of this statement where a description of the Application Site, technical details and justification for the design and details of the public benefits of the proposal are provided.

5.4 Practical Applications of 5G Connectivity as Example of Material Socio-Economic Benefit

5.4.1 As 5G technology is deployed across the country more and more services will become available and our lifestyles, economy and even the way we commute will be transformed. Additional base stations and upgrades to existing ones will be needed to meet this demand and improve the quality of service. The application site will be fitted with the latest technology meaning that users can experience huge service improvements. As this Site will provide the cutting-edge technology, it seems prudent to consider some of the numerous benefits 5G brings, some examples are given below however the enclosed document titled “The Public Benefit of Mobile Connectivity” gives a more in-depth insight as to what to expect from 5G.

5.5 Education

5.5.1 The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

5.5.2 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

5.6 Health

5.6.1 Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

5.6.2 5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

5.7 Siting and Appearance

5.7.1 From the outset, it should be appreciated that irrespective of the development's use as a communications site, any installation of a tall new structure will always be, to some degree, a noticeable addition in the local area. However, it should be recognised that visibility does not equate to harm.

5.7.2 The choice of design at the application site is governed by two main factors; the context and visual amenity of the area; and the technical requirements. As far as practicable the proposal has been designed to keep to a minimum the impact on local amenity.

5.7.3 The proposal would not result in the loss of sunlight or overshadowing of any properties, nor would the proposal result in loss of outlook from any property. The development would not give rise to issues relating to noise and disturbance.

5.7.4 Structures - such as that proposed by the applicant - are now largely accepted as being ordinary elements of the urban environment and so have increasingly less capacity to draw the eye, particularly in areas with mature trees which mitigate the view of the vertical feature.

5.7.5 The need to respect the character and appearance of the area is fully acknowledged and by virtue of the proposal's scale and appearance, this aim is achieved. The degree of visual change in the area would be low. Any change should be weighed against fulfilling the identified need and associated public benefits of the provision of high quality digital mobile connectivity to this area.

5.7.6 It is considered by the applicant that any visual impact caused by this installation has already been mitigated through the best design available within the technical constraints of the site, and any perceived visual impact that this site has already caused is now already established and outweighed by the significant public benefits that the proposal has provided, and will continue to provide, in terms of network coverage. It is of the applicant's opinion that the proposal is considered acceptable from a town planning and environmental perspective.

5.7.7 As noted within this Application, the benefits of high-quality connectivity, including 5G services are vast. The provision of these services requires telecommunications equipment such as that proposed here, the need for the physical infrastructure cannot be ignored and should be weighed against the benefits provided.

5.8 Site selection

The rationale for the proposed installation is to maintain and improve the existing NTQ site coverage, future proofing the EE and Three Mobile network coverage in this area. As previously stated, it is believed this site is best placed to provide such improvements.

5.9 National Planning Policy Guidance

National Planning Policy Framework (2021) (NPPF)

5.9.1 The NPPF provides national policy for all planning matters. The specific points of interest relating to this telecommunications installation are noted below.

5.9.2 Paragraph 11 states "Plans and decisions should apply a presumption in favour of sustainable development...For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

5.9.3 Paragraph 20 states that strategic policies should "make sufficient provision for:

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)".

5.9.4 Leading on from this, Section 10 of the NPPF addresses supporting high quality communications infrastructure. Paragraph 114 sets out that "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." The Application Site is exactly the kind which is working towards this government aim.

5.9.5 The most important section of the NPPF relating to the proposed site is that Paragraph 26 highlights that the installation of all wireless infrastructure requires a balanced approach between the technical needs and constraints of the proposed site and the potential impact of the development. The three key technical and operational considerations for installation sites are:

a) Coverage: wireless infrastructure needs to provide an appropriate level of coverage over the intended geographical area. This involves ensuring that antennas are elevated sufficiently (often via masts) to provide clear lines of sight for signals.

b) Capacity: where existing network infrastructure can no longer meet the demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand. This is more likely to be required in densely populated areas or areas of high footfall.

c) Backhaul: the radio access network requires a connection to the core network. Backhaul is sometimes provided by a microwave link, which requires a clear line of sight between the two ends of the link.

5.9.6 Paragraph 115 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." In this case, the proposed installations are vital for providing much needed network coverage across the local area, and it has been found there are no other appropriate sites nearby upon which existing telecommunications infrastructure can be utilised and upgraded.

5.9.7 Paragraph 117 dictates that "applications for electronic communications development...should be supported by the necessary evidence to justify the proposed development". This should include:

c) for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

5.9.8 Paragraph 118 clarifies that "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."

5.9.9 The proposal set out herein is in accordance with Section 12, Achieving Well-designed Places. The careful siting of the equipment has not caused a loss of green space. The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal, to establish reliable connectivity within the local area, whilst facilitating new 5G technology, will assist in achieving these objectives. The proposal outlined within this document is in complete accordance with the guidance as set out in the NPPF.

5.9.10 Planning Practice Guidance explains how a prior approval application differs from a planning application at paragraph 28. It states that:

5.9.11 "The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light touch process which applies where the principle of the development has already been established. Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion on what processes they put in place. It is important that a local planning authority does not impose unnecessarily onerous requirements on developers and does not seek to replicate the planning application system"

5.10 Local Planning Policy Considerations

5.10.1 Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.10.2 For the purposes of Section 70, the current adopted development plan for the London Borough of Hilingdon Council relevant to the proposal, comprises:

- Hillingdon Local Plan: Part One - Strategic Policies (November 2012);
- Hillingdon Local Plan: Part Two - Development Management Policies (January 2020);
- The London Plan (2021).

5.10.3 The London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area.

5.10.4 The Mayor opens the 2021 London Plan with his foreword, giving a vision for London's future. In his vision, the emphasises the importance of good digital connectivity in improving the lives of residents and the success of businesses.

5.10.5 “It is about making London a city with clean air for our children to breathe, and a pioneering smart city with world-class digital connectivity supporting more digital devices to improve the lives of Londoners and enable businesses to thrive."

5.10.6 The London Plan seeks what the Mayor terms “Good Growth” within the nation's capital.

5.10.7 Policy GG1 Building strong and inclusive communities suggests that ways to do this include (C) “provide access to good quality… infrastructure… increasing… social integration and addressing social isolation” and (D) “seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city”. This proposal supports both of these points, by providing a Network that enables social interaction virtually as well as an opportunity to increase productivity and boost the economic success of an area (as detailed in Section 4 of this document).

5.10.8 The Application Site seeks to provide high quality connectivity, including 5G data services which can be utilised to enable users to access medical appointments remotely as well as enabling medical professionals to make a diagnosis remotely and provide other services as detailed earlier in this section. This is working towards part E) of the Policy GG3 Creating a healthy city.

5.10.9 Paragraph 1.5.4 headed ""Growing a good economy” states: “The right infrastructure is also required to help businesses succeed across London. The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever- increasing importance, improving processes, opening up new markets and allowing more flexible working."

5.10.10 Policy GG5 Growing a good economy (D) seeks to ensure that “…physical and social infrastructure is provided to support London’s growth” and (E) “ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning.” In order to achieve these aims, good mobile phone infrastructure and connectivity is required at home, work and on the go. More than ever, mobile phone users wish to communicate with others, or access internet services whilst on the move, enabling them to continue with business matters or e-learning. New telecommunication installations as well as upgrades to existing telecommunication installations, will be required in areas where current coverage is deficient in order to achieve the Good Growth policy aims as well as the aim to “be a world-leading tech hub with world class digital connectivity” (para 9.6.1 of the London Plan 2021).

5.10.11 The mobile phone network can also contribute towards Policy GG6 Increasing efficiency and resilience, specially (A) a move towards London becoming a zero- carbon city and (C) creating a safe environment resilient to emergencies. As noted elsewhere in this document, reliable high-quality connectivity enables users to access internet services wherever they are, this works to promote homeworking, as well as the opportunity to access other services, such as medical appointments, remotely which reduces the need to travel, further promoting the zero-carbon agenda. Mobile handsets enable members of the public to contact the emergency services instantly from any location, this can assist in early warning calls, preventing a catastrophe, or in response to an emergency of some kind. In 2014 Ofcom released a statement regarding emergency calls (calls to 999/ 112) and mobile phones. In that statement, Ofcom stated that there were around 36 million emergency calls each year, two thirds of which were from mobile phones. This further supports the need for good connectivity as users who find themselves in dire need of emergency assistance, need to be confident that there is sufficient mobile infrastructure around them, that has the ability to connect their call.

5.10.12 Policy D1 London's form, character, and capacity for growth B(2) requires boroughs to assess “the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth.” As stated elsewhere in this document, the Application Site will meet the needs of the existing customers, as well as the anticipated growth with additional uptake in handsets as well as increased data demand. This element of ‘future-proofing’ of the network works towards Policies D1 and D2 Infrastructure requirements for sustainable densities.

5.10.13 The Application Site has been designed with consideration of the surroundings and utilises high quality materials, adhering to Policy D4 Delivering good design.

5.10.14 “Policy SI 6 Digital connectivity infrastructure sets out the Plan's aims for digital connectivity, including mobile phone connectivity. The Policy is drafted with much consideration being given to fibre connectivity and broadband, but it is clear that the aim of the policy is to support better connectivity in general in the capital.

5.10.15 “Policy SI 6 Digital connectivity A To ensure London's global competitiveness now and in the future, development proposals should:

1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users

2) meet expected demand for mobile connectivity generated by the development

3) take appropriate measures to avoid reducing mobile connectivity is surrounding areas; where that is not possible, any potential reduction would require mitigation

4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.

5) 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.”

5.10.16 The London Plan acknowledges the importance of digital connectivity. Paragraph 9.6.1 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… 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.”

5.10.17 As noted earlier in this document, the Application Site will provide improved 2G, 3G and 4G technologies to the surrounding area as well as new 5G services. The mayor’s objective of achieving a “smarter city", as set out in the London Plan, is only possible with a fast and reliable communications network. Paragraph 9.6.9 states: “Digital connectivity supports smart technologies in terms of the collection, analysis and sharing of data on the performance of the built and natural environment, including for example, water and energy consumption, waste, air quality, noise and congestion. Development should be fitted with smart infrastructure, such as sensors, to enable better collection and monitoring of such data. As digital connectivity and the capability of these sensors improves, and their cost falls, more and better data will become available to improve monitoring of planning agreements and impact assessments, for example related to urban design. Further guidance will be developed to make London a smarter city.”

5.10.18 It is considered that the Applicant's Network is an integral element in securing the mayor’s vision for the delivery of high-quality digital connectivity networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in the London Plan.

5.10.19 The first policy to note in the Local Plan Part 2 is Policy DMHB 11 (Design of New Development). This requires the design of new development to be of the highest standard in terms of appearance and function. It must be noted that the proposed development will be visible from certain areas within the surrounding vicinity, however the proposed visible development will not cause any significant detrimental impacts on the nearby amenity. The proposed location is considered to comprise of the appropriate balance, in relation to the local constraints and NPPF, between visual amenity and the proposed objective and purpose of the development proposal. It is considered that the development is in compliance with the criteria outlined in Medway Local Plan.

5.10.20 Policy DMHB 21 (Telecommunications) states that: telecommunications development will be permitted subject to: : i) it is sited and designed to minimise their visual impact; ii) it does not have a detrimental effect on the visual amenity, character or appearance of the building or the local area; iii) it has been demonstrated that there is no possibility for use of alternative sites, mast sharing and the use of existing buildings; iv) there is no adverse impact on areas of ecological interest, areas of landscape importance, archaeological sites, Conservation Areas or buildings of architectural or historic interest; and v) it includes a Declaration of Conformity with the International Commission on Non Ionizing Radiation. It can be considered that the proposed development complies with the above-mentioned policy.

5.10.21 No conflict has been identified with any other Local Plan Policies.

6 CONCLUSION

6.1.1 The principle of development has already been established by the Government when the new permitted development rights came into force in April 2022, which enabled sites such as this one to be built under the operators permitted development rights, with prior approval for siting and appearance being the only matters that the local planning authority can take into consideration. The reasoning for the siting and

appearance of the proposed development have clearly been outlined within this report, with the location and height of the mast being required due to operational requirements.

6.1.2 The proposed installation will enable EE and Three Mobile to provide the required improved 2G, 3G and 4G services to area while also providing new 5G services, forming part of a network of high technology. These services allow home working and working on the move which can reduce the need to travel, thus contributing to the sustainability agenda.

6.1.3 This statement has demonstrated that the proposal is in accordance with the London Borough of Hilingdon Council Local Plan and National Planning Policy set out in the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact on the Conservation Area, being appropriately designed and located. This statement should be deeply considered within the current political climate, as the government endorses the roll-out of 5G and encourages private and public bodies to support improvements in telecommunications to pave the way for the UK to boast world-class digital infrastructure.

6.1.4 In conclusion, the application merits support and there are no material considerations that indicate otherwise.

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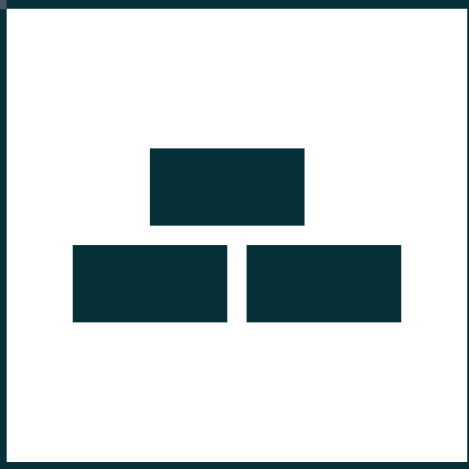

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