

**SUPPLEMENTARY INFORMATION**

1. Site Details

Site Name:	“Corner of Bridge Road and Arnison Road”	Site Address:	Bridge Road (southwest of junction with Arnison Road), East Molesey, KT8 9HY
National Grid Reference:	514982, 168110		
Site Ref Number:	96733	Site Type: <sup>1</sup>	Macro

2. Pre Application Check List

**Site Selection (for New Sites only)**

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

**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
Summary of outcome/Main issues raised:	
<p>Comments and advice were sought from the local authority by letter dated 22/02/19. No response was received.</p> <p>Some contact was had with planning officer Nathen Fell on 13/03/19, however this was as a result of a local resident copying the local authority into a response to community consultations, which resulted in a need to clarify the planning situation. No comment was made as to the merits of the proposal or any related issue.</p> <p>The decision has now been taken to seek formal comments by way of an application for prior approval.</p>	

<sup>1</sup> Macro or Micro

## Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
<p data-bbox="113 232 1495 268">Outline of consultation carried out:</p> <p data-bbox="113 309 1495 600">The site and proposed works were assessed against the traffic light model contained within the Code of best Practice on Mobile Network Development in England (2016) prior to consultations being undertaken. A red rating was assigned due to evidence of historic multiple community objections to unrelated telecommunications proposals in the wider area, the proximity to Conservation Area boundaries and a Listed building and to residential properties. Over and above the requirements of the Code, letters outlining the proposal and providing an opportunity to seek additional information or submit comments ahead of the formal planning action were issued to the following on the 22<sup>nd</sup> of February 2019:</p> <ul data-bbox="177 640 1495 831" style="list-style-type: none"> <li>• Ward representatives for Molesey East Ward</li> <li>• Ward representatives for the neighbouring ward, Thames Ditton Ward</li> <li>• Selected properties on Bridge Road including Boleyn Court and Kingfisher Court</li> <li>• Highways authority (the adoption status of the verge having been confirmed with them previously)</li> </ul>			
<p data-bbox="113 902 1495 938">Summary of outcome/main issues raised (include copies of relevant correspondence):</p> <p data-bbox="113 978 443 1014"><u>Local representatives:</u></p> <p data-bbox="113 1055 1495 1601">Councillor Selleck of Molesey East Ward contacted the agent and sought some clarification on the proposal. Concern was also expressed that at the proposed height, the monopole structure would not be an appropriate addition to the area. The councillor also queried whether residents of Boleyn Court had been consulted suggested that equipment could be placed on top of a building near to Hampton Court station as an alternative. Further information was provided over an exchange of several e-mails on the aesthetic of the proposed structure, why that structure type had been selected and why the 15m height was required. It was confirmed that Boleyn Court residents had been consulted and that the voluntary consultation process was ongoing at that time. Further information was also provided on the site selection process, need for the installation and the technical constraints that influenced where it can be placed, details of which are provided below and/or in later sections of this statement. It is noted that a number of other parties, including the other ward representatives, were copied into Cllr Selleck's mail and so also had sight of this additional information. No response was received following the agent's final mail to the councillor on 28/02/19, however it is understood that the objections raised during this correspondence remain.</p> <p data-bbox="113 1641 1495 2002">One of the parties included in the mails to and from Councillor Selleck was SCC Councillor Ernest Mallatt who later contacted the agent directly to advise that details of the proposal had been forwarded to a representative of St Pau's Church, East Molesey who, it was advised, is actively looking to hosts telecommunications apparatus on or within the church. The church representative followed up by provided details on the location of the church and a photograph of the building. The agent reviewed the location and passed information onto the network radio planner for review. It was later confirmed that the church, which is approximately 50m northwest of the application site, was unsuitable for a number of reasons, which will be detailed in section 5. The style of building and its Grade II protected status also presented issues from a planning and design perspective, but ultimately the technical issues ruled our this as a</p>			

potential alternative solution. This information was relayed back to the church representative and Councillor Mallett.

#### Highways:

The highways authority contacted the agent on 28/02/19 and asked that the applicant's check that the sightlines for vehicles exiting from the junction with Arnison Road. A response was issued the following day confirming that this had been checked by the design team and that there would be no obstruction. Nothing further was received in response.

#### Resident responses:

Objections were raised by a number of residents on the following grounds:

#### **Need for the site**

Queries were raised regarding the legal agreement with the landowner of the and reasons for the need to vacate, the suggestion being that it might not necessary for the site to be removed from service. This does not pertain to siting or appearance. The Applicants are not at liberty to disclose the nature of any private commercial agreement, but can confirm that future development plans by the landowner necessitates the removal of their apparatus from the land. As was noted during consultations, the requirement to replace an operational site, with the potential for network disruption or local outages, is not one that any operator wants and this will be avoided wherever reasonably possible. In some cases, it is simply not possible, at which time the operator has an obligation to seek to prevent or remedy any negative impact on network users.

Although further information will be provided with regards to the specific technical requirement of this case in later sections of this statement it is highlighted that paragraph 116 of the National Planning Policy Framework is clear that in determining applications for telecommunications development local authorities should not question the need for an electronic communications system or seek to prevent competition between different operators.

#### **Siting near to a Conservation Area**

Objection was raised by a number of parties to siting telecommunications apparatus near to a Conservation Area. In this case the area within which the base station must be sited in order to achieve the technical requirement is largely comprised of residential roads and contains part of two Conservation Areas and so proximity to one or both is unavoidable. Telecommunications infrastructure is now commonplace in suburban and urban areas and this includes Conservation Areas, as the great majority of people in all towns and cities now expect to have seamless mobile coverage in these areas. It is not the case that a telecoms installation will always be acceptable within a designated area, but there are a great many cases where they have been found so by local authorities and by the higher planning body, the Planning Inspectorate. That said, where the opportunity to site outside of a Conservation Area exists and allows for a proposal that is considered technically and visually appropriate that option will in the majority of cases be the one that is selected. This is the case with the application site which is one of few unprotected locations within the search area. Impact on nearby heritages assets has been limited as far as practicable, through design, as will be discussed in later sections of this statement. It will also be demonstrated that the public benefits of the proposal weigh in favour of the proposal when balanced against any limited harm that might potentially occur.

### **Siting within a residential area**

Objection was expressed by a large percentage of respondents on the grounds of the perceived inappropriateness of deploying telecommunications infrastructure within a residential area and it was suggested that a commercial areas or other land uses be investigated. Further details of the site selection process will be provided within section 5 of this statement. As advised to a number of residents, however, residential areas are not avoided by telecommunications operators on principle as there is no scientific or planning reason to do so and that doing this would in many instances result in large areas with demand for mobile services being unable to receive them. In this case the area within which the base station must be sited in order to achieve the technical requirement is largely comprised of residential roads. The selected location is in an area which is not exclusively residential, unlikely many other locations within the search area, there being a car show room opposite.

### **Consideration of Alternative sites**

A number of the responses received suggested that alternative sites should be considered. For the most part, this followed objection to siting telecommunications apparatus in a residential area or near to a Conservation Area, which has already been discussed and will be addressed again in later sections. As noted previously, following contact from a local councillor, a local church contacted the agent and offered to potentially accommodate the apparatus on site. Unfortunately, following review by the network radio planner, it was confirmed that the location and building were not technically suitable. Please refer to section 5 for further details on site selection.

### **Consultation**

A number of objections were received on grounds not relating to the proposal itself but to the level of public consultation. In some cases it was suggested that parties such as the local school and named residential properties had not been consulted and this was erroneous, in other cases, respondents considered that the consultation area should have been extended. This does not pertain to siting or appearance. As noted previously, consultation guidelines for telecommunications development are provided within the Industry's Code of Best Practice. Direct consultation with individual residential properties is not included. The issue of such was a voluntary exercise undertaken in order to gauge local opinions and to provide those living closest to the site an opportunity to consider the proposal and seek further information prior to the formal submission of an application and formal consultations with local stakeholders by the local authority as is required by the planning process. Selection of properties for inclusion in any such voluntary consultation is done on a case-by-case basis, but will in the majority of cases, focus on those closest to a development site and with unobstructed views. Comments were also received that consultation letters should have include a set of drawings. The agent opts not to issue drawings with public mail-outs as it is ecologically unsound, but will provide them on request.

### **Impact on property values**

Some respondents expressed concern that the presence of telecommunications infrastructure in the area could negatively impact the value of their property. This does not pertain to siting or appearance and is not a matter for the local authority to consider as the planning system is not in place to protect any one party's financial interests above another or above public benefits.

The above notwithstanding, it was suggested to several respondents that property buying is a subjective rather than definitive issue in that not everyone wants the same thing from a property or an area. Whilst there may be some people who do not like having communications infrastructure in their local area, other people will specifically check for communications and connectivity services before considering moving into a property or area. Whilst anecdotal evidence can be found to support a case for or against, there is no actual hard evidence of a negative correlation between telecommunications network development and property values.

### **Health issues**

Objection was raised by a large percentage of respondents on the grounds of a negative impact on health. This does not pertain to siting or appearance.

The letter issued on 22nd February 2019 confirmed that the site has been designed to be fully compliant with the public exposure guidelines established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and that a certificate of compliance would be provided to the local authority with any planning submission.

Additional information regarding scientific findings following research into the potential health implications of mobile telecommunications development and links to independent sources of information was provided as appropriate.

ICNIRP is the independent commission set up to provide scientific advice and guidance on the health and environmental effects of non-ionizing radiation to protect people and the environment. The guidelines are made up of two parts: the first is based on established and proven science; the second part incorporates a safety factor meaning that the guidelines come with a built-in precautionary element. They are in place to protect all members of the public, wherever they are in relation to a base station, for 24 hours a day.

Paragraph 116 of the NPPF stipulates that local authorities should not set health safeguards different from the International Commission guidelines for public exposure. As these have been met, consideration of health issues should not factor into assessment of this application.

### **Compliance with Best Practice Guidelines with regard to design**

Please refer to the design justification provided within section 3.

### **Compliance with local and national planning policy**

Policy compliance is addressed throughout this statement, but in greatest detail within section 5.

## **School/College**

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

A search for schools and non-domestic childcare institutions was conducted via Ofsted and Department for Education databases. The Orchard Infant School was identified as the nearest school, located approximately 165m from the site.

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

Letters were sent to the Head Teacher and to the Chair of school Governors, both via recorded mail and at the school address. The letters were issued on the 22/02/19 and proof of delivery provided by Royal Mail shows that they were received signed for on the 25/02/19.

Summary of outcome/main issues raised (include copies of main correspondence):

Consultation did not generate any feedback.

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

**Developer's Notice**

Copy of Developer's Notice enclosed?	<b>Yes</b>	No
Date served:	17/04/19	

3. Proposed Development

The proposed site:

The application site is located on the grass verge at the rear of the pavement on Bridge Road in East Molesey, approximately 22.5 metres southwest of the road junction with Arnison Road at the nearest point (15m from the edge of the verge). The verge is clear of street furniture at the proposed point of installation but accommodates, to the northeast, two BT cabinets at the rear of the verge and rubbish bin and wooden bench on the north end of the verge on the boundary with the wide area of pavement at the Bridge Road / Arnison Road junction, facing northeast (away from the application site). A tree stump separates the application site from these elements.

The verge is back by a low brick wall which marks the boundary of the property behind, a three storey block of flats. A number of mixed species evergreen and deciduous trees sit behind that boundary wall.

Land use in the wider area is predominately residential and contains a variety of houses and flats of varying ages, sizes and architectural styles. Small pockets or retain or commercial use are observed and the application site itself sits between residential and commercial uses, having a block of flats to the rear and car sales showroom on the opposite. A denser concentration of commercial use is observed further to the northeast, around 200m from the application site as one

travels away from the residential area towards Hampton Court station. Street furniture observed closer to the site includes lampposts, telegraph poles with overhead cables, traffic signs, bus stops, bins, utilities cabinets and pedestrian crossings. The vertical elements appeared to be arranged without uniformity in terms of their positioning on the highway or verges. Individually planted trees in the area are observed in many cases to rise above the line of development which is generally observed to be low level.



**Application Site Viewed From Southwest On Bridge Road**

The application site is on unprotected land. It sits in a pocket of undesignated land between the East Molesey Kent Town and East Molesey Bridge Conservation Areas. Kingfisher Court sits approximately 45m northeast of the application site. The 1930s art deco style residential block is a Grade II Listed Building. 95 and 97 Bridge Road to the southwest are also Grade II Listed, located at an approximate distance of 75m from the site.

This application seeks the introduction onto this roadside verge of mobile telecommunications infrastructure required to ensure continued provision of mobile services following the impending loss of an operational site from the network for reasons beyond the operator's control. That infrastructure comprises a 15m high street furniture style monopole with a shrouded antenna section and 2no. small externally located dishes. The monopole would be accompanied by 4no. equipment cabinets, for which prior approval is not sought as they represent Class A permitted development under Part 16 of schedule 2 of the GPDO.

Enclose map showing the cell centre and adjoining cells if appropriate:

Network information is provided separately within this application.

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

Description:

15m high MBNL Phase 5 monopole with shrouded antennas (3no.) and 2no. 300mmØ dishes supported at 10m.

**FOR INFORMATION ONLY**

As detailed on the accompanying plan, 4no. equipment cabinets, permitted by Class A of Part 16, Schedule 2 of the GPDO are to be deployed. These do not form part of the application, but for information, their types and dimensions are as follows:

Link A/C MK4 – 0.6m x 0.5m x 1.52m(h) (steel, fir green)

Fredo – 0.9m x 0.8m x 1.2m(h) (steel, fir green)

Komodo – 1.23m x 0.4m x 1.54m(h) (steel, fir green)

3900A – 1.2m x 0.48m x 0.9m(h) (steel, fir green)

Overall Height:	15m
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Height of existing building (where applicable):	N/A
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Equipment Housing:

Length:	N/A
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Width:	N/A
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Height:	N/A
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Materials (as applicable):

Tower/mast etc – type of material and external colour:	Steel with GRP shroud, coloured “fir green” – RAL6009
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Equipment housing – type of material and external colour:	N/A
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Reasons for choice of design, making reference to pre-application responses:

**Background**

When designing a radio base station it is necessary to incorporate certain vital elements and to work 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) and communicate with mobile phones and wireless devices.

Other elements necessary for the base station to function are the power source (a meter cabinet or a generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas, link dishes and, depending on the nature of the site various supports,



grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

## **Site design**

The location of the site was heavily constrained by technical issues, as will be detailed in subsequent sections.

It is noted that during pre-application consultations, it was queried with residents how this design complies with the requirements within the NPPF (paragraph 113) and within the Industry Code of Best Practice (appendix A) that structures should be sympathetically designed and camouflaged where appropriate. The use of camouflage in particular was questioned. Camouflage in the context of communications infrastructure can be complex and it is limited by the need to include certain technical elements into a standard base station design, as listed in the “background” portion of this section. It is simply not possible to camouflage, in the sense of fully concealing, apparatus that needs to be installed at ground level and achieve antenna heights of 15m or greater and it will to a lesser or greater degree be visible. However, certain measures can still be implemented to limit visibility and impact, noting that the two are not the same, and aid assimilation into the host environment

Once the verge on Bridge Road had been selected due as the optimum site location, care was taken to select the most appropriate form of structure for this environment. Due to the nature of this site and surrounding area, which is a mixed use but predominately residential area, the natural choice for a support structure was a street furniture style column with a shrouded antenna section. Other design choices such as an unshrouded industrial style monopole or lattice structure were not put forward as they would not be feasible in this space or visually appropriate. This structure type has been specifically selected because it is one designed to be installed in suburban and urban areas amongst standard pieces of street furniture, such as lampposts. It has a narrow footprint and support column similar to a lamppost, above which the antenna are fixed. The antenna section, which is slightly wider due to the size of those components, is concealed at the top of the slim column within a GRP shroud, this is not a technical requirement and added purely to lessen the capacity of such installations to draw the eye or appear conspicuous in normal street environment.

The same regard to impact was had during the design of the layout. 4no. cabinets are required to generate the signals on all the required frequencies and to provide a power and transmission link. As detailed previously, these do not require prior approval, nonetheless, care was taken to arrange these in a manner that would not impede normal use of the highway and that would minimise visual impact. Consideration was also had to pedestrian movement, to the presence of underground services, and potential interference from trees. The verge is not a designated thoroughfare and care has been taken to ensure that the equipment housing as well as the monopole would all be sited well back from the pavement edge to avoid any obstruction to pedestrian movement. No part of the development would protrude further than the existing tree stump on the verge and indeed the majority of apparatus less than that.

An assessment of the specified location was made by the specialist network planners, factoring in, amongst other things tall trees or buildings in the area, through which the signals cannot penetrate, the placement of the location in relation to the site being lost from the network and in relation to other existing sites within the established network pattern and variances in land levels within the intended service area. Panoramic photographs were taken at a series of increasing heights to determine the lowest height at which any nearby clutter could be avoided. This, combined with the network planner’s specialist software tools, allowed the required height to be

determined. Due to the mature of the area, particular regard was had to the mixed use nature of the area and upper heights of surrounding development and it was considered imperative to limit the proposed height of the structure to the absolute minimum at which the site could operate effectively and safely. Thus, whilst structures of up to 20m can be deployed without the need for planning consent, a revision to planning legislation made in recognition of the changing needs and constraints to technology, the height was restricted to 15m. At 15m tall, the upper section of the monopole would protrude above the adjacent tree line, as is necessary for operation reasons, but not to such a degree as to have unacceptable visual impact.

The antenna section is concealed at the top of a slim column within a GRP shroud, this is not a technical requirement and added purely to lessen the capacity of such installations to draw the eye or appear conspicuous in normal street environment.

A colour scheme in keeping with the grass verge and adjacent trees, dark green, has been selected for all the apparatus which will aid its assimilation into the streetscene.

In all aspects of the design, the size, height and overall scale of apparatus has been kept to the minimum commensurate with effective and safe network operation and due care has been had to limit visual impact as far as practicable working within the various technical constraints. The selected design represents the best possible design solution, allowing a balance to be achieved between these technical and environmental considerations.

#### Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)	<b>Yes</b>	<b>No</b>
<p>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.</p> <p>When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, EE and Three operate its networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p> <p>As part of EE and Three's networks, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance</p>		

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.

#### 4. Technical Justification

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

The proposed site is required as a replacement rather than additional base station within the area.

EE and H3G (known as the operator Three) have a radio base station located at Wardray Premise on Summer Road. The operators have been advised of plans by the landowner to redevelop the land and as such the operators will be unable to stay on site and need to find a replacement location for a base station in order to ensure continued provision of network services within this cell area.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV and downloads. The base stations are connected to each other and by cables or wireless technology to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. There are several variables that determine the size and shape of each cell.

Because base stations are low powered radio transmitters they each have a limited range, meaning that they generally need to be located close to the area requiring coverage. One moves too far away from that area then it is likely that some areas will remain without the services they previously enjoyed.

When an existing site is lost from the network it leaves a very specific "gap" in coverage within the established network pattern which needs to be filled. The consequence of not doing so is that users of the network find that the services they previously had access to are either limited or removed.

High quality communications infrastructure is essential for sustainable economic growth and that high speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.

The UK Government recognise the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is

promoted throughout the planning system. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

The Planning Inspectorate too has in recent years continually recognised the importance of this issue and cited it in appeal decisions that have overturned the decisions of local authorities across the UK where there has been a failure to apply due weight to the value of connectivity to social and economic prosperity in the assessment of applications made for telecommunications development, even in protected or sensitive areas. As an example, in October 2018 the decision of Winchester City Council to refuse prior approval for the installation of a 17.5m high monopole and associated equipment housing, required to replace an established site being lost from Vodafone's network, was overturned by the Planning Inspectorate (CTIL and Vodafone Vs Winchester City Council, appeal reference APP/L1765/W/18/31975). Within the decision notice, the Inspector stated that:

*"I attach significant weight to the public benefit arising from the continuation of local service provision.....Having regard to all relevant considerations.. my findings are that the proposal's public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area".*

A similar circumstance exists in this case, with the application proposal required to prevent the loss of services on two networks, a matter certainly in the public interest.

Ofcom's Communications Market Report 2018 provides a figure of 92 million active mobile subscribers in the UK at the end of 2017. It details that 78% of adults now use a smartphone and that 76% of mobile users are using their devices for web and data access. Figures within the report also confirm that users are spending an increasing amount of timer per day using their mobile phone. 68% of participant in the Touchpoints research reported that they "could not live without" their mobile phone (rising to 78% among 25-34s). Whilst not included within the research figures, anecdotal evidence suggests that this number is greater still amongst those aged under 18. All of which points towards the nations increasing dependency on mobile services and connectivity.

As recognised by the London Assembly's Regeneration Committee within its "*Digital Connectivity in London*" report, published June 2017, digital connectivity is now widely regarded as the "*fourth utility, an everyday necessity alongside water, gas and electricity*" and also noted that "*mobile broadband is, and will continue to be, an essential complement of fixed broadband*". It is no longer a luxury, but a service essential to modern life.



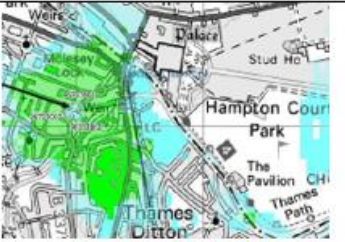



The loss of services on two major networks at a time when reliance on connectivity services is a fundamental part of every day is simply unacceptable.

Coverage plots accompanying this statement provide a simple visual representation of the relevant coverage issues.

For each operator a pack of slides is included that shows the provision of indoor and then outdoor coverage from the existing site on each of the technologies (2G, 3G and 4G for EE and 3G and 4G for H3G). The impact of removing this site from the network without securing any replacement is then depicted on each of the technologies at both indoor and outdoor levels. The benefits to the network of deploying the appeal proposal is shown, again on each of the technologies and at both indoor and outdoor levels. The plots are modelled using a specialist tool and overlay shading on a

base map to represent various signal levels, as shown on the associated plot key. Where no shading is added this indicates that insufficient coverage is or would be present to allow reliable use of a phone or other wireless device.

For example, the extracts provided below show the indoor 4G levels on the two networks, indoor penetration being desired in all urban, suburban and commercial areas. The central slide in each shows an area devoid of shading, showing a loss of service, which is then infilled wholly or partially in the third slide, which depicts the introduction of base station 96733, the application proposal.

	Existing Indoor 4G	4G Indoor Coverage Loss	Proposed Replacement Indoor 4G
Three			
EE			

2G (GSM) allows for basic voice calls and text services. 2G operates using lower frequencies than 3G and 4G. These lower frequencies have longer wavelengths which are more resilient to physical obstructions and will, in general, cover larger geographical areas. This contributes to the fact that 2G coverage is often more commonly achieved in rural or remote areas than 3G or 4G.

3G (UMTS) is a more efficient technology than 2G for voice communications and also allows for data transmission as well as text services as mobile phones, computers, and other portable electronic devices access the internet wirelessly.

4G (LTE, the acronym used for 'Long Term Evolution') supports mixed data, voice, video and messaging traffic and offers speeds of up to five times faster than 3G, enabling network users with 4G devices to benefit from ultra-fast internet browsing, video streaming, gaming, e-mail and downloads.

The plots clearly evidence that the loss of site 98405 from the Wardray Premises site on Summer Road would result in significant to total losses of indoor services across all the technologies (3G and 4G for Three and 2G, 3G and 4G for EE) in the local area and significant degradation of outdoor services. This would impact voice calls, messaging services and data services. They further evidence that the application proposal would remedy these losses. If deployed prior to the loss of site 98045, site 96733 could prevent this significant disruption to local services for users of the two major mobile networks. There is a demonstrable need for the proposal.

## 5. Site Selection Process

There are specific constraints associated with site placement in mobile network planning. It has already been touched upon that radio base stations can each only cover a limited geographical area known as a cell and that cells are designed to overlap to form an unbroken network. Site placement is always critical in network planning and becomes even more so when one is seeking to replace an existing base station already operating within the established cellular pattern. When an existing site is lost it leaves a very specific and unique gap in the network, much like removing a piece from a completed jigsaw would, which needs to be re-filled if users living and working within that area are to be able to continue to use their mobile phones and other wireless devices. This places even greater limitations on the potential siting opportunities as many locations will not enable this specific gap to be adequately filled.

Prior to selecting the proposed site, a comprehensive investigation was undertaken by the applicant's network planners, acquisition and planning agents to find a site specifically capable of replacing that on Summer Road. Potential sites are considered in terms of their technical suitability to provide the required level of service, the effect on visual amenity and their ability to be acquired, built and maintained. The aim of site identification is to find the most technically efficient site, which has the minimum impact on visual amenity. Various options might theoretically be suitable in terms of one of these considerations, but not the other. A balance between the two must be achieved.

The area from within which a site will be capable of providing the desired coverage, the "search area", is determined by the network radio planners. In this case that area was made up on a mixed residential and commercial areas within the East Molesey Kent Town Conservation Area and residential areas within the East Molesey Bridge Road Conservation Area and the undesignated roads between the two.

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
RT	Hampton Court Parade, East Molesey KT8 9HE	515306,168293	Although well placed geographically, the building is not suitable to host the required apparatus due to the pitched roof and can't be utilised.
RT	Anne Boleyn House, Queens Reach, East Molesey KT8 9DE	515251,168239	The majority of the roof is pitched and there is insufficient space for the necessary apparatus on the small flat section.
RT	Catherine of Aragon House, Queens Reach, East Molesey KT8 9DE	515251,168239	The pitch of the roof makes the building unsuitable for accommodating the necessary apparatus.
RT	Kingfisher Court, Bridge Road, East Molesey KT8 9HL	515077,168164	The building is Grade II Listed. An opportunity exists, in the application proposal, to achieve the technical requirements with an acceptable visual impact and without deploying apparatus on a Listed Building or on protected land, thus the progression of this site would not reasonable.

RT	Boleyn Court, Bridge Road, East Molesey KT8 9HY	514952,168116	The pitch of the roof makes the building unsuitable for accommodating the necessary apparatus.
RT	Wolsey Court, Bridge Road, East Molesey, KT8 9HS	514925,168045	The building, located within a Conservation Area, is too low to enable the minimum required antenna height to be achieved and ICNIRP guidelines complied with without a substantial, and visually inappropriate, structure being added.
RT	Westlands Court, Bridge Road, East Molesey KT8 9HQ	515056,168230	The building, located within a Conservation Area, is too low to enable the minimum required antenna height to be achieved and ICNIRP guidelines complied with without a substantial, and visually inappropriate, structure being added. It is unclear from ground level what degree of the roof is flat and could accommodate an installation, so this might not be a feasible build option in any case, but this was not investigated further once the height had been confirmed as too low.
RT	St Pauls Church, Church Road, East Molesey, KT8 9DR	514624,168610	<p>The church was not looked at during the initial area search as it falls outside of the designated search area. It was suggested to the agent during public consultations on the application proposal, as noted in section 2 of this statement. Following review by the radio planner, it was confirmed that it did not represent a feasible option to remedy the impending network issues.</p> <p>The location of the church in relation to the established network pattern and technical requirement would not allow for full replacement coverage provision and a second site would still be required within the local area, whereas the application proposal allows a single site to meet this requirement. The locational issues are exacerbated by the feasible height at which antennas could be installed.</p> <p>As was advised to the church during consultations, buildings like this church also offer very little flexibility in terms of the height and orientation of antennas due to the fixed position of the louvres / openings and also limit the size of the apparatus we can install behind them. An external installation wouldn't be appropriate from a planning perspective, given the attractive and historic nature of the building and the protection rightly afforded to it by the statutory Listing. Whilst this can be successfully achieved at many listed sites, there is no obvious design solution that would allow the necessary apparatus to be supported and be acceptable here.</p>

			Ultimately, though, the technical problems resulting from the location are what prevents this being progressed for EE and Three as a replacement for site 98405.
RT	Palace View, 2-6 Bridge Road, East Molesey KT8 9HA	515310,168415	The design of the building, which has a curved roof, precludes the installation of rooftop telecommunications apparatus.
GF	BP Garage, Hampton Court Way, East Molesey	515337,167972	There is insufficient space to deploy the necessary apparatus without obstructing the use of the premises, thus this could not be pursued.
SW	Hampton Court Way, East Molesey, KT7 ORG	515397, 167934	A location was identified where apparatus might be suitably accommodated, being both visually appropriate and where sufficient space to accommodate the equipment was found, a combination not observed elsewhere, however a trial dig to confirm clearance of utilities identified the presence of underground services not shown on the utilities maps obtained, which would prevent build, this this option could not progress.
SW	Island at the Bridge Road/ Creek Road junction (opposite Hampton Court Station), KT8 9JE	515347,168421	This is an open and exposed area within the East Molesey Kent Town Conservation Area. Whilst sufficient space exists for the necessary apparatus, an installation here would not benefit from any screening. Better opportunities existing, namely the application proposal, to limit visual impact and to avoid siting directly within a Conservation Area, thus this was not selected for progression.
SW	Palace Road (partial), East Molesey, KT8 9DJ	515162,168371	Part of the road falls outside of the search area, being too far northwest to enable the technical requirement to be adequately met. The agent investigated whether any suitable siting opportunities existed on the southeast section of the road but found that an installation would be overlooked by properties on both sides of the road, without significant separation distance or intervening screening elements. Better opportunities exist in terms of lesser visual impact and avoiding deploying apparatus within a Conservation Area and so Palace Road was discounted from the search.
SW	Wolsey Road (partial), East Molesey, KT8 9EL	515006,168273	Part of the road falls outside of the search area, being too far northwest to enable the technical requirement to be adequately met. The agent investigated whether any suitable siting opportunities existed on the southeast section of the road but found that the majority of the road is directly overlooked on both sides within without significant separation distance from housing or intervening screening elements. The verge at the



			Wolsey Road/Bridge Road junction could potential accommodate apparatus, however this relatively attractive and exposed greenspace does not present the best possible option in terms of limiting visibility and impact, both of which can be bettered at the application site, which unlike Wolsey Road also site outside of the Conservation Area.
SW	Arnison Road, East Molesey, KT8	514925,168178	Part of the road falls outside of the search area, being too far northwest to enable the technical requirement to be adequately met. The agent investigated whether any suitable siting opportunities existed on the southeast section of the road. As with many of the other residential roads within the search area, it was observed that the pavements are generally overlooked on both sides. The southern side is at points much narrower than the opposite side of the road, making it even less suitable. No point was identified that was considered appropriate in terms of visual impact and highways clearance. All bar the very eastern end of the road is additionally contained within the East Molesey Kent Town Conservation Area. As an opportunity exists to deploy apparatus nearby, but with the benefits of tree screening, additional space and lack of any protective designation, the road was discounted from the search.
SW	St. Johns Road, East Molesey, KT8 9JH	514903,168125	The agent investigated St. Johns Road as it falls within the designated area of search, but it was immediately apparent that it does not present any suitable siting opportunities due to the pavement widths and fact that it is directly overlooked on both sides by housing in close proximity. For that reason, the road was, in its entirety, discounted from the search.
SW	Bridge Gardens, East Molesey, KT8 9HS	514900,168038	Bridge Gardens falls within the area of search and outside of the two Conservation Areas within that area. However, it does not present any suitable siting opportunities as pavements on both sides of the road, for the entirety of the road, are directly overlooked by housing on both sides with no intervening screening and little to no separation distance.
SW	East side of Bridge Road, outside of Kingfisher Court, East Molesey, KT8 9HL	515188,168301	The grass verge on the east side of Bridge Road is notable in that it sits in one of few locations within the search area observed to be neither within a Conservation Area nor wholly residential, as there are commercial premises opposite. It is inferior to the application site in that the property directly to the rear is Grade II Listed and that it doesn't offer the same degree of screening on

			approach from any direction. It doesn't represent the best option in terms of planning considerations and was therefore not selected.
SW	Cedar Row/Cedar Close, East Molesey, KT8	515028,168068	Cedar Road, leading through to Cedar Close, falls within the area of search and outside of the two Conservation Areas within that area. However, no location was identified where a base station could be suitably deployed due to the arrangement of houses and lack of available positions not directly overlooked and with sufficient space to deploy the necessary apparatus.

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

N/A

The applicant has undertaken a comprehensive search process during which all reasonable potential alternative siting options have been discounted.

In 2015 the Planning Inspectorate determined that a lack of alternative options can outweigh the visual impact associated with telecommunications installations. In allowing an appeal brought by Vodafone Ltd against the London Borough of Bexley (site on Halfway Street, Sidcup), the Inspector concluded that *"I consider it unlikely that there is an alternative which would meet the operator's needs as effectively but with materially less harm. The need and lack of better alternatives weighs in favour of allowing the appeal. I conclude on balance that whilst the proposal would harm the character and appearance of the locality, this would be outweighed by the need and lack of better alternatives"*.

The applicant considers that the selected site on Bridge Road is an appropriate one and wholly capable of absorbing the proposed installation without unacceptable impact, but highlights that the comprehensive efforts undertaken during site selection and lack of any more suitable, feasible option from which to serve the public interest is considered relevant and indeed material to the assessment of the siting and appearance.

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

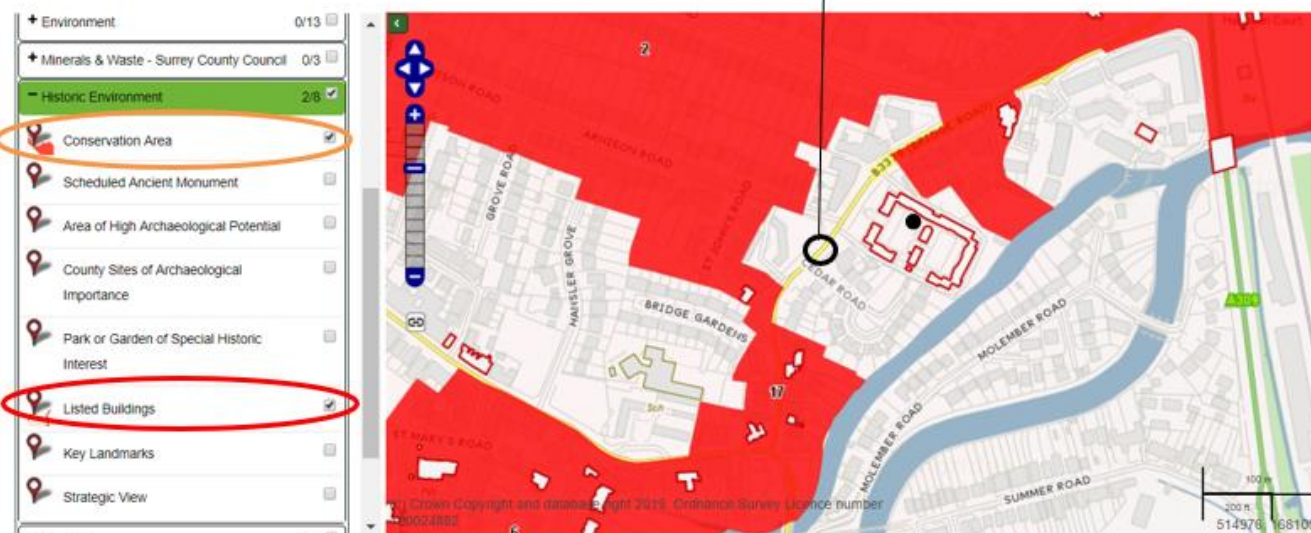
**Siting and Appearance:**

A description of the application site and the design justification are provided in section 3. Details of the locational constraints are provided within section 4 and details of alternative locations considered during the site selection process earlier within this section of the statement (5). The following comments should be read in conjunction with these preceding sections and with regard to the fact that the equipment housing discussed is included for clarity and information only, but does not require prior approval.

Following the comprehensive area survey undertaken by the applicants' agents the location on Bridge Road was selected as being the best available and technically feasible option that could be progressed. It has already been detailed that there are significant technical constraints involved

in replacing an operational site in a communications network without causing disruption to services and that in terms of siting this results in a limited geographical area within which the new site must be located. In this case that specific area is sensitive in that it falls within part of two separate Conservation Areas (East Molesey Kent Town and East Molesey Bridge Road) and within a small area of unprotected but almost wholly residential land close to their boundaries.

### Planning policy map



Extract from Elmbridge Council planning Policy Map – online version (source [http://emaps.elmbridge.gov.uk/ebc\\_simple.aspx?requesttype=parseTemplate&template=PlanningPolicy.tmplt](http://emaps.elmbridge.gov.uk/ebc_simple.aspx?requesttype=parseTemplate&template=PlanningPolicy.tmplt)) with annotations

The application site, whilst located close to protected land and to residential use, is not itself within either Conservation Area, nor is it in an area that is wholly residential. The site is opposite a used car dealership, comprised of a two-storey showroom and offices and with numerous vehicles on display in the external lot that fronts onto Bridge Road. Very few locations were observed within the search area that are both undesignated and have a mixed use context. The other roadside locations identified (refer to discounted options), once it had been determined that there were no buildings or structures that could be successfully utilised, were either less suitable for planning reasons or could not be built. The lack of any other undesignated site not surrounded by or directly overlooked by housing from all sides weighs in favour of the application site.

Also weighing in favour of the application site is the opportunity to deploy all the necessary apparatus without any reduction of the footpath or potential impact on vehicle sightlines, provided by the width of the verge and the available space well set back from the nearest road junction.

Trees to the rear of the site provide an appropriate backdrop and a degree of screening, depending on the viewing angle, augmented by the slight curvature of Bridge Road within relatively short distances to both the northeast and southwest, which limits visibility of the site. Trees to the northeast provide additional screening on approach from that direction and break up the skyline in views from the southwest, providing both a backdrop and vertical context for any installation deployed at this location.

Taking into account the specific technical requirement and nature of the search area, the verge on Bridge Road represents the best possible location and best balance between these technical and environmental considerations.

In terms of appearance, it has been detailed in preceding sections that the type of structure proposed was specifically designed to be deployed in roadside locations and to blend with standard pieces of street furniture such as lampposts. They are now largely accepted as being ordinary elements of urban and suburban street scenes and so have increasingly less capacity to draw the eye.

This view is one that has long been supported by the findings of the Planning Inspectorate. As early as 2005, in overturning the decision of Southampton City Council to refuse consent for a 15m high monopole and associated equipment housing, the Inspector stated:

*“The proposed monopole would be clearly visible rising from the pavement in what is undoubtedly a prominent location. However, it is also a location where vertical structures are an existing and evident feature of the street scene and it must be taken into account that telecommunications masts are becoming commonplace features on roadsides in urban areas such as this one”* (APP/D1780/A/04/1162049 - H3G Vs Southampton City Council).

In the thirteen years since the above appeal was determined, roadside telecommunications infrastructure has become more commonplace still, increasingly so as the dependence on mobile technology has risen. The very high level of mobile phone use and ownership within the UK population, as is referred to in “The Communications Market” report quoted in section 4 of this statement, is a very clear indication of the public’s overwhelming acceptance of the benefits of mobile communications. The amount of infrastructure required to keep up with demand has also increased and in doing so has become more commonplace.

The above notwithstanding, it has already been demonstrated that efforts have been made to reduce the impact of development. Included with this application are a series of photomontage produces by a specialist supplier to demonstrate that this has been successfully achieved. The viewpoints have been deliberately restricted to relatively short distances and at a time when deciduous trees in the area were not in full leaf in order to provide a “worst case” picture of impact. Even then, that impact is shown to be within acceptable parameters.

An existing and proposed shot are provided in the full photomontage set provided for full comparison. For illustrative purposes the proposed views only are extracted within this section.

The first view provided is from the residential street Arnison Road, where it is noted a number of residents expressed concern that the development would be conspicuous and or unsightly. The southeast end of Arnison Road, captured within this view is also the closest point of the East Molesey Kent Town Conservation Area, from within which the shot was taken. The distance from the camera location to the site is 82m (the length of the road is approx. 430m).





● Monopole Location      ▲ Camera location, field of view and direction.



Proposed

The screening benefits of the intervening trees and vegetation are immediately apparent in this view, even with the deciduous trees bare of foliage. The permitted equipment housing is wholly obscured and only the upper most part of the monopole is visible. The antenna shroud, like the remainder of the monopole, would be coloured dark green. As demonstrated, this would allow it to blend with the adjacent and nearby trees. Significantly, the perspective lent by even this fairly short distance is shown to prevent the 15m height of the proposed monopole from appearing excessive in this context. To the contrary, it appears far shorter than other elements in the foreground and, as such is not overbearing and not harmful to the skyline or to the appearance of the area in general. It is evident that there would be no material or substantial harm to the character or appearance of the Conservation Area, rather, the impact is shown to be minimal.

The second viewpoint is from approximately 90m to the northeast, outside the grade II Listed Kingfisher Court and looking towards the East Molesey Bridge Conservation Area. From this vantage point, the monopole is more exposed than in the previous one and views of the permitted equipment housing are now achievable. It is important at this juncture to distinguish between visibility and harm and highlight that one does not necessarily equate to the other. The applicants are not arguing that the proposal would not be visible from various vantage points, though the degree of that visibility is variable, but that the impact of its presence within those views is one which is acceptable and which is outweighed by the public benefits brought.



● Monopole Location      ▲ Camera location, field of view and direction.



Proposed

In this view, the proposed monopole and permitted cabinets sit in front of the trees and are, bar a portion of one cabinet, visible in their entirety. The dark green colouring of the apparatus against this backdrop of trees and grass is successful in aiding the assimilation of the apparatus into the existing street scene. The silhouette of the monopole is distinguishable, but it is not shown to be an incongruous or eye-catching feature. Even when not in full leaf, trees on the east side of Bridge Road break up the skyline and soften views of the monopole, which does not appear to be the tallest feature on the skyline. Views into the Conservation Area are not materially altered or harmed by the introduction of the application proposal onto the roadside verge. The cabinets are similar in size and appearance to the other utilities cabinets already present on the verge, and in the wider area. Despite the presence of those features, neither the pole nor the permitted equipment housing result in unacceptable clutter due to the width of the verge and their neat linear arrangement. Clear views remain across the junction and it is evident that there would be no obstruction to the pavement.

The final viewpoint provided is a short distance shot taken from the southwest on Bridge Road. Within this view, both monopole and equipment housing are visible at the roadside, though the midsection of the column is obscured by trees. As with the previous viewpoint, commercial uses are visible in both the foreground and opposite the site.



● Monopole Location  
▲ Camera location, field of view and direction.



Proposed

The monopole appears taller than the adjacent trees and those further northeast on Bridge Road and than the street lighting and traffic signs, but not significantly so, with the result that it is a notable but not harmful addition to the skyline. The slim, simple design of the structure and its positioning set back from the roadside assists in preventing a harmful impact. It is significant to note that the setting of Kingfisher Court does not suffer an unacceptable impact. As has been stated previously, shrouded monopoles are now commonplace features at roadsides across the country and, as is the case with the majority of these, the application proposal does not look incongruous in this modern suburban roadside setting.

Overall the appropriateness of siting and design are demonstrated to result in an acceptable level of visual impact.

## Policy Context

### National Planning Policy Framework (2019) (NPPF)

The National Planning Policy Framework came into force in July 2018 replacing the guidance published in March 2012 and was updated in February 2019. The NPPF sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states "*The purpose of the planning system is to contribute to the achievement of sustainable development*", and in paragraph 10 that "*at the heart of the Framework is a presumption in favour of sustainable development*". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

*"a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

For decision-taking (paragraph 11) 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."*

Further to this, paragraph 38 states that "*Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.*"

The application proposal would allow the continued provision of reliable mobile communications services to the surrounding area of the East Molesey, which brings about substantial public



benefits both socially as well as potentially allowing for businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the 'virtual office', thus reducing the need to travel and contributing to the sustainability agenda. The loss of these services, where a wholly suitable option is available to prevent it by allowing for provision of replacement infrastructure, goes against the aims of the Government as expressed within the NPPF.

The NPPF directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

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

Leading on from this, paragraph 112 states 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"*. Again, the proposal is entirely consistent with the aims expressed within the NPPF.

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 113 states that *"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"*. Whilst a new site is proposed within this application, it would replace one being lost from the network, thus the overall number of sites would remain neutral. It been detailed that numerous siting options were considered prior to the final decision being made to deploy a new free standing site, but that none proved both feasible and more suitable than the option now put forward.

It should be noted that paragraph 116 states 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"*. A certificate of compliance with ICNIRP guidelines is included within this application.

Not specifically related to telecommunications development, paragraph 196 of the NPPF is relevant in that it address development that might potentially affect a heritage asset, specifically those that would result in "less than substantial harm". The heritage assets in this case are the nearby Conservation Areas and Grade II Listed Kingfisher Court.

The proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.

The special attributes of the extensive Kent Town Conservation Area, as detailed within the area appraisal, relate to the high proportion of Victorian Buildings, undeveloped back gardens, "important" trees and the traditional building line. It is noted that there has been some infilling of larger plots since the Second World War, redevelopment and the conversion of a number of the



larger old buildings into flats. The application site does not lie within the Kent Town Conservation Area.

Bridge Road Conservation Area, smaller than Kent Town CA, incorporates some of the oldest parts of the original village of East Molesey. Whilst much of the area has been redeveloped, isolated examples from of 16th, 17th, 18th and 19th Century buildings survive. The majority of buildings are speculative suburban housing (i.e. mass market housing types) dating from the later 19th or 20th centuries and the area is dominated by residential use, with many former commercial properties having been converted. The built form of the area is produced by “a combination of the surviving scattered and sporadic development along the road from the 17th, 18th and early 19th centuries, consolidated by speculative suburban development during the later 19th and early 20th centuries”. The Conservation Area appraisal observes that there is no surviving historic street furniture, all of which dates from no earlier than the late 20th Century. Lighting columns are described as “utilitarian” in appearance. The application site does not lie within the Bridge Road Conservation Area.

Kingfisher Court is located to the northeast of the application site, on the opposite side of the road, separated from it by the London and Surrey Cars showroom. The development is formed of substantial residential blocks set around a central rectangular courtyard. Although perhaps not a typical example of the architectural style, it is generally of Art Deco appearance and is considered to be a good example of 1930's architecture in this style. As such it was granted Grade II protected status in 1999 following refurbishment and repairs.

The visual impact section of this statement and the included photomontages, evidence that impact on the area in general would not be unacceptable. The views into and out of the Conservation Areas and showing the setting of Kingfisher Court further demonstrate that any impact upon them would not be significant. Whilst the applicants are of the view that the impact upon these heritage assets would in fact be negligible, any harm would certainly be less than substantial. That being the case, the NPPF is clear that that harm should be weighed against the public benefits of the proposal. It is stated in section 4 of this statement that the Planning Inspectorate has in recent years continually recognised the importance of connectivity. When applying the balancing exercise encouraged at paragraph 196 of the NPPF the Inspectorate has found in multiple cases that the provision, or prevention of loss to existing services can outweigh less than substantial harm to heritage assets.

In determining one such appeal, brought operator Telefónica (O2) against the decision of the London Borough of Harrow to refuse prior approval for the installation of a 12.5 metre high monopole with shrouded antenna section and accompanied by an equipment cabinet on a roadside verge in the urban area of Harrow-on-the-Hill (appeal reference APP/M5450/W/17/3180345, determined in December 2017), the Inspector concluded that:

*“The proposal would be permitted development and provide public benefits in extending the telecommunications capacity of the area. In applying the balancing test of paragraph 134 of the Framework, I consider that these benefits outweigh the harm that would arise from the proposal's impact on the character and appearance of the Conservation Area”.*

These findings were echoed by the Inspectorate in determining a further case brought by the same Appellants against the decision of the London Borough of Hillingdon to refuse planning permission for a 15 metre high monopole with shrouded antenna section and associated equipment housing at a roadside location within the urban area of West Drayton (APP/R5510/W/16/3143922, 2016).

The Inspector concluded:

*“The Framework sets out the importance of an advanced high quality communications infrastructure for sustainable growth and makes specific reference to the development of high speed broadband technology. This is reflected in the London Plan and the public benefit arising from the improvement of the telecommunications infrastructure is a material planning consideration that weighs in favour of the proposal.*

*Taking account of all matters I have concluded that the limited harm caused to the significance of the heritage asset (the CA) would be outweighed by the public benefit that would arise from improving the communications infrastructure”.*

In both cases cited the developments were new base station installations proposed within Conservation Area and it was determined that they would give rise to a degree of harm to the heritage asset in question. Despite this, the importance of providing a quality communications infrastructure was recognised by the Inspectorate and awarded due weight in the determination of the cases brought. That weight was sufficient for both appeals to be successful despite the recognised harm. In the case of this appeal, the same public benefit occurs, however the applicants have avoided siting the proposed development within a Conservation Area or directly adjacent to the Listed Building. To the contrary, an unprotected site, benefitting from tree screening and mitigation of extensive impact though the changing angles of the road, has been selected.

### **Local Guidance**

Guidance for telecommunications development in the borough is found within the 2015 Development Management Plan. Policy DM16 “Telecommunications” is supportive of development and states that the installation of telecommunications apparatus will be permitted subject to a number of criteria being met by the proposal.

These are that they are sited “*to achieve operational efficiency, taking account of the existing and planned future networks*”, that there is no significant adverse impact on visual amenity, that alternative sites have been considered and details provided and that technologies to “*miniaturise and camouflage any telecommunications*” have been explored and incorporated where possible and that they are appropriately designed and sited to take account of the setting.

The policy ends by stating that “*installations should avoid sensitive local areas including conservation areas and listed buildings, Green Belt, sites of nature conservation importance, sites of special scientific interest, Local Green Space, strategic views and landmarks and the Thames Policy Area unless there is evidence that this is technically impractical*”. This last sentence demonstrating a recognition of the constraints faced in siting telecommunications installations and fact that on occasion siting within protected or sensitive areas cannot be avoided.

Compliance with each of the criteria has been demonstrated throughout this document. The siting has been dictated by the need to achieve operational efficiency and the selected location, chosen following a comprehensive area search detailed within this statement, presents the best opportunity to do this with the minimum impact on the area. A justification of for the design, including details of technical constraints and methods employed to minimise visual impact through appropriate siting and design has been provided. It has also been stated that much of the search area in this instance fell within one two Conservation Areas. The applicant has however selected an unprotected site, in accordance with DM16.

There is no conflict with the local Authority's telecommunications policy, nor with any aspect of the National Planning Policy Framework.

The proposal represents an appropriate addition to the street scene, one which achieves the best feasible siting and design options, taking into account the numerous constraints faced. The impact of development is outweighed by the public interest brought and that impact has been demonstrated to be an acceptable one. Thus, the approval of the local authority is respectfully sought.