SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Sandy Lane	Site Address:	Sandy Lane, Teddington, London, TW11 0DH
National Grid Reference:	516481, 170276		
Site Ref Number:	CTIL_24032820	Site Type:[1]	Street Furniture

2. Pre Application Check List

Site Selection (for New Sites only)
(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: N/A Upgrade		
Were industry site databases checked for suitable sites by the operator:	Yes	**No**
If no explain why: N/A Upgrade		

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: Pre-application correspondence was sent to the LPA by email on 25th April 2019. No response has been received to date.	

Community Consultation

Rating of Site under Traffic Light Model:	**Red**	Amber	Green

[1] Macro or Micro

Outline of consultation carried out:

As with all Cornerstone proposals, the site and proposed works were assessed against the traffic light model contained within the Code of best Practice on Mobile Network Development (2016). A red rating was assigned in this instance and pre-application consulation letters were sent by email on the 25th April 2019 to Teddington Ward Councillors, Cllrs. Barker, Melengorn and Woodcock and to the Member of Parliament for the area, Sir Vince Cable.

On 25th April 2019 pre-application consulations letters were also sent to the following properties close to the site:

- 31 – 64 Sheaf Way
- 133- 144 Harrowdene Gardens
- 243-254 Harrowdene Gardens
- 237-242 Harrowdene Gardens

A total of 80 properites were consulted.

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

Five resident objections were received during the pre-applications consulation. The reasons for their objections include health issues associated with the radio base station and the visual impact it will have to the surrounding area.

All UK mobile base stations are designed to comply with guidelines set by the set by the International Commission on Non-Ionisation Radiation ('ICNIRP'), an 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.

Every effort has been made to keep the installation as small as possible, but this is bound by technical restraints. Upgrading an existing site, as we are looking to do so in this case, means there is no need to deploy new telecommunications infrastructure in the area, reducing the impact on the local area.

One letter of support was received from a local resident on the condition that the redundant pole located adjacent to the existing Vodafone pole is removed. Subject to receiving planning approval, the old unused equipment will be removed from the site.

School/College

Location of site in relation to school/college (include name of school/college):
The site is not considered close enough to the any schools.

Outline of consultation carried out with school/college (include evidence of consultation):
No schools were consulted.

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

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response: N/A- Full Planning Application		

Developer's Notice

Copy of Developer's Notice enclosed?		Yes	No
Date served:	n/a – full application		

3. Proposed Development

The proposed site:
The development site is an existing telecommuications installation located on highways land at the junction of Sandy Lane and Harrowdene Gardens. The site itself is located adjacent to garages which are surrounded by residental housing and flats. The current development consists of a 14 metre high pole with two cabinets at ground level. The site cabinets are located on a grassed highway at the back of the verge while to the pole is located on the pedestrian footpath. The existing site currently provides coverage for Vodafone only. This upgrade proposal will allow the site to be shared by Telefonica (O2) to provide new and improved 3G and 4G coverage for Telefonica along with improved 3G and 4G coverage for Vodafone. The development consists of the replacement of existing 14m pole with a new 15m pole, the installation of 2no new cabinets, and ancillary works thereto. The cabinets will be located adjacent to the the exsisting cabinets and the replacement pole will be location in the same position as the old one. There is a 10m redundant EE pole located adjacent to the site and, as part of this upgrade, it will be removed at the time of build. The site is not located within land designations, however, it is located opposite Bushy Park Conservation Area

Enclose map showing the cell centre and adjoining cells if appropriate:
Network information will be attached with this application.

Type of Structure *(e.g. tower, mast, etc):*	
Description: The existing 14m Jupiter stacked street pole will be removed and replaced by a 15m Elara dual stack streetpole. To support the operation of Telefonica from this site, it is also proposed to install 2No. new equipment cabinets.	
Overall Height:	
Height of existing building *(where applicable):*	N/A
Equipment Housing:	
Length:	1.896Metres
Width:	0.798Metres
Height:	1.648Metres
Materials *(as applicable):*	

Tower/mast etc – type of material and external colour:	Green (RAL6009) or any other colour requested by the local authority.
Equipment housing – type of material and external colour:	Green (RAL6009) or any other colour requested by the local authority.

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

In designing the proposed scheme, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree.

It is pertinent at this juncture to highlight that 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 the structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). The type of technology being deployed determines the type of equipment and antennas required, which in turn impacts upon the type of support structure and or design methods than can be employed on an aesthetic level. In order for the base station to effectively provide coverage to the desired areas and fit in with the established network pattern, specific antenna orientations and heights, determined by the radio planners, must be also achieved.

Features of the surrounding area such as existing buildings and trees must also be sufficiently cleared in order that they do not block the signals from the antennas. All of this imposes limitations on what can be achieved through site layout and design. Due regard must be had in considering the impact of the selected design to such technical constraints.

In all aspects of the design now put forward the smallest practical components have been utilised to ensure that the visual impact of the development is kept to the absolute minimum. With the current development only being utilised by one operator, the upgrade will allow both operators to share a single site, which will reduce the impact on the local area as a new telecommunications site will not be needed in the area to meet the required coverage.

In both the existing and the proposed structures, the antennas are concealed from view within a glass reinforced plastic (GRP) shroud on top of the supporting column and arranged in a stacked array. In this case Telefónica's antennas are being installed into the pole and will be sitting below Vodafone's antennas. The benefit of this arrangement is that it allows the shroud to be as slim as possible. Arranging the antenna in a back-to-ueensbury Circle Parade, Streatfield Road/Charlton Road, Stanmore, London, HA3 9HH (REF: EJ/CTIL_150077 25) - Kentonback array would result in a much wider top section and less streamlined look. The proposed antennas are wider than the existing ones and physicallty cannot be accommodated into that or a similar pole, thus a new structure type is required. We have selected a structure that is still has a slim foundation however has a wider headframe to support the new antennas.

The proposal does involve the height of the monopole to be increase from 14.5metres to 15metres. The applicant has previously submitted a planning application for this upgrade under reference 19/2259/FUL. This application proposed to replace the existing 14m monopole to a new 17.5 meter monopole. This proposal was refused due to unacceptable design, height, scale, mass, siting to the character and appearance of the street scene adjoining Bushy Park Conservation area. The applicant acknowledges this reasons, and as a result has chosen to reduce the height of the monopole to 15 metres, which is only 0.5m difference to the existing structure height.

The small height increase is required in order to place both Vodafone's and Telefonicas antennnas inside one pole. If the height of the pole did not increase, two separate pole would have to be installed, which would cause more visual harm to the area. The permitted development rights for telecommunications infrastructure on a highway land are set at 20m, highlighting the recognition by legislators and higher planning authorities of the changing needs of telecommunication operators.

Placing both Vodafone's and Telefonica's antennas into one slimline pole will reduce impact on the local area as a new telecommuicartion site will not have to be installed in order to meet the technical requirements. This upgrade option has been selected to ensure that only slight visual changes are made without causing harmful impact on the setting of the area or without the need for a second pole to be installed within the same area.

In order to facilitate the generation of the enhanced 4G coverage for Telefonoica, it is proposed that 2No. additional equipment cabinets be installed. The existing cabinet is full of Vodafone's equipment and can not accommodate any additional equipment for Telefonica, thus the need for additional cabinets. The specific arrangement of the apparatus has taken into consideration the need to prevent obstruction to the public highway or to access points thereon to underground public services, to separate the apparatus, as far as was practicable, from existing street furniture elements in an effort to avoid contributing to a cluttered appearance along this section of the highway.

The equipment cabinets are of a simple, utilitarian design and similar in appearance to utility cabinets commonly observed at roadside locations in urban and suburban areas throughout the country

The applicants have made considerable efforts, within design limitations, to achieve a design which limits impact upon its surroundings to a minimum, avoids harm to the local area. It is strongly considered that the current proposal accomplishes these goals.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) International Commission on Non-Ionizing Radiation Protection public compliance is	Yes	

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, Telefonica operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of Telefonica's network, 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.		

4. Technical Justification

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

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

The proposal would provide new and improved 3G and 4G coverage for Telefonica along with improved 3G and 4G coverage for Vodafone to the surrounding area. It would provide improved localised coverage and link with sites in neighbouring cell areas to form part of the national networks.

Improving cellular connectivity is led largely by demand. 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.

Ofcom's 2018 Communications Market Research Report shows that smartphones are owned by four of every five UK consumers. Almost eight in ten UK adults (78%) personally use a smartphone. While take-up of fixed broadband has plateaued at 80%, accessing the internet on a mobile phone continues to grow, from 66% in 2017 to 72% in 2018. Demand for data continues to grow rapidly for UK consumers, with 1.9GB consumed by an average mobile subscription per month in 2017, (up from 1.3 GB the previous year). The report found that more than seven in ten now use their mobile to access the internet.

Research by TouchPoints in 2017 found that 64% of adults in Great Britain agreed that the internet was an essential part of their life, up from 54% in 2012. Among under-35s, more than 80% agreed, but the steepest increase was among over-65s, with 36% considering the internet to be essential, up from 22% five years previously. This shows that all ages of society are now utilising and valuing being connecting, aiding in the transformation of telecommunication services being viewed as an essential utility, rather than a service.

The convenience of using the internet through a smartphone, and the availability of highspeed mobile networks, are key enablers of out-ofhome internet use. Use of a smartphone increased from 27% of all adults in 2011 to 78% in 2018,4 while the proportion of mobile connections with access to 4G services rose from 3% in 2013 to 63% in 2017.

It is for these reasons that the National Planning Policy Framework places such emphasis on encouraging the continued rollout of high-speed digital infrastructure networks, of which the proposed development will form a key part.

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the local planning authority in understanding any technical constraints on the location of the proposed development.

5. Site Selection Process

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
N/A			

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

Paragraph 113 of the revised National Planning Policy Framework, in which the Government's supportive stance towards developing high quality communications infrastructure is laid out, 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.*"

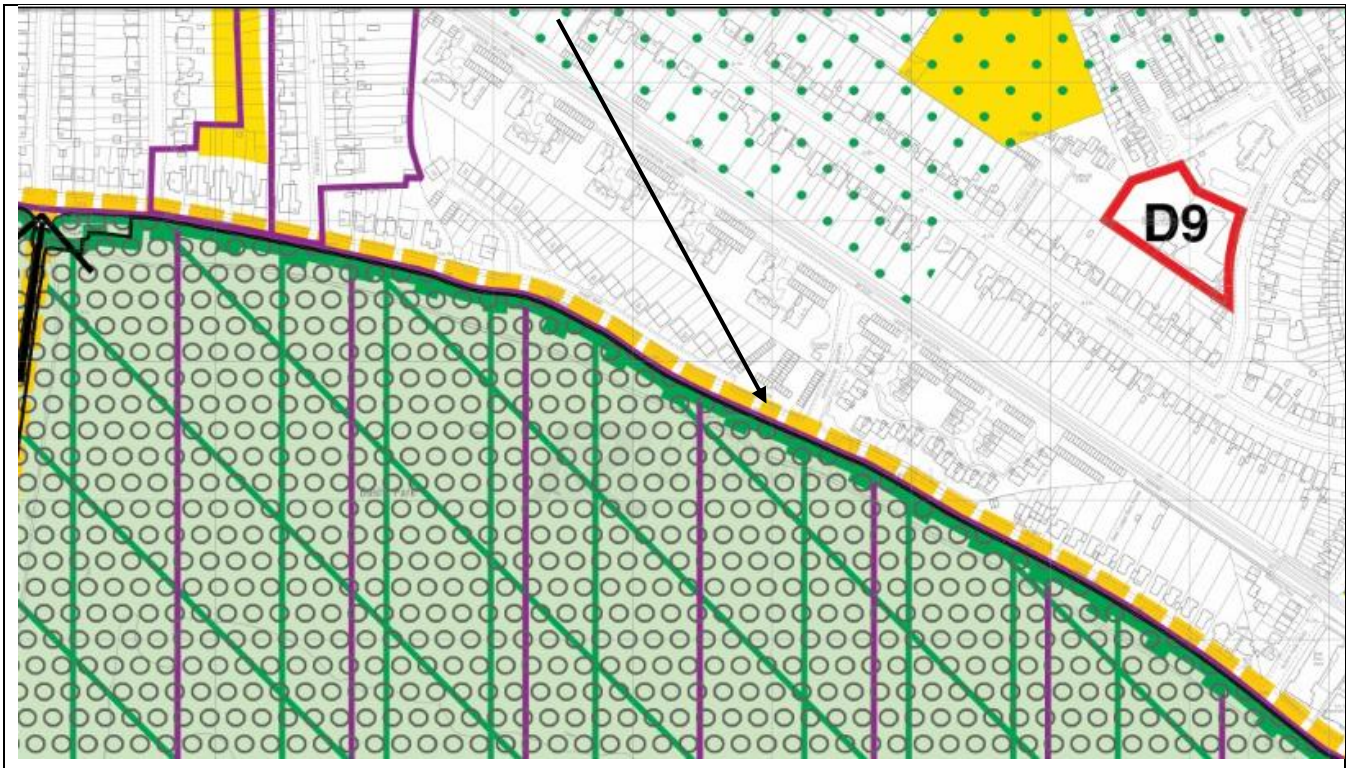
The proposal is for works at an established telecommunications site and not for the development of a new site, thus the consideration of alternative sites is not appropriate. The applicant has examined its portfolio of sites in this region and determined that there are no alternatives in the area which can be upgraded to meet the specific technical requirement. The application site represents the only feasible option in this instance which allows the requirement to be met without the deployment of an additional base station in the locality.

Environmental Information (refer to Section 2 of Site Finder Report):

As far as practicable the proposed upgraded development has been designed to keep to a minimum the impact of the development on the surrounding area. A taller pole is proposed, however the additional impact would be minimal and not sufficient to cause harm to visual or residential amenity.

A check of the Environment Agency website has confirmed the site not located within an area which is prone to flooding.

Land use planning designations (if Heritage Statement is required then include here or make reference to attached Heritage Statement):



The above map is taken from Richmond's 2015 adopted proposals map. The site is located on a Local Distributor Road and located opposite Bushy Park Conservation Area.

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

VISUAL IMPACT AND APPEARANCE

An upgraded installation is required to provide enhanced coverage to the area for both Telefónica and Vodafone. The site provide new and improved 3G and 4G coverage for Telefonica along with improved 3G and 4G coverage for Vodafone.

It is considered that the proposal utilises the most suitable design available to meet coverage demands. It is important to keep the impact of telecommunications development in the area to a minimum, in particular bearing in mind its location within a predominantly residential area, and it is considered this proposal achieves this. The substantial benefits of the proposal also have to be considered. Enhanced 3G and 4G coverage would be provided for both Telefónica and Vodafone from the shared site. It is considered the benefits of the proposal significantly outweighs the minimal additional impact on the surrounding area. The alternative of proposing an additional installation in the area to provide the enhanced coverage would have a greater overall impact.

The applicant previously submitted a planning application, under the Ref 19/2259/FUL, which proposed the existing 14 meter monopole is replaced by a 17.5m monopole. This application was refused due to unacceptable design, height, scale, mass, siting to the character and appearance of the street scene adjoining Bushy Park Conservation. The applicant acknowledged this reason,

and as a result has reduced the height of the pole to 15meters in order to make the site more visually acceptable.

It is considered that the proposed location is the least visually intrusive site and design available to the applicant which also ensures adequate coverage can be provided. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding visual harm to the site and its wider setting. The replacement pole, although taller, would only have a minimal additional impact. This additional impact would not be sufficient to cause harm to the area and would be outweighed by the substantial public benefits of the proposal.

The colouring of the cabinets has specifically been chosen to blend in with the surroundings however if Council would like to make suggestions on an alternative colour then this would be welcomed and considered.

On balance this proposed location is considered to be the optimum location in terms of siting and design, with the limited harm it may impose on the surrounding area being outweighed by the provision of enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2019) (NPPF)

The new National Planning Policy Framework, which came into force in July 2018, replaces the guidance published in March 2012. The guidance has subsequently been 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 proposed development will enable the provision of reliable and improved mobile communications services to the surrounding area, bringing about substantial public benefit both socially as well as the allowing for certain 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.

Government advice in recent years has been to promote and encourage communications services. Within his presentation to Parliament in July 2015 of the Government report "Fixing the Foundations: Creating a more prosperous nation" the Chancellor of the Exchequer reiterated the importance of a high-speed digital communication infrastructure. "*7.1 Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.*

By reducing regulatory red tape and barriers to investment, the government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure

Strategy, published in March, of near-universal 4G and ultrafast broadband coverage."

The NPPF (2019) 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*".

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*".

By utilising an established base station site, and providing coverage for two operators, the proposal is in line with the above policy.

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*".

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.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 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.

For the purposes of Section 70, the current adopted development plan for the London Borough of Richmond upon Thames, relevant to the proposal, comprises:

- The London Plan: Spatial Development Plan for Greater London;
- The Council's Local Plan (adopted July 2018).

The London Plan

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. In Paragraphs 1.38-1.41 'Ensuring the infrastructure to support growth', the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to secure its long-term growth.

It is considered that the applicants' network is an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in Policy 4.11 'Encouraging a Connected Economy' of the Plan, which states that:

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

a. facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive broadband access meeting the needs of enterprises and individuals.

b. support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits."

At paragraph 4.55 of the supporting written justification to policy 4.11, the Mayor "wishes to ensure sufficient ICT connectivity to enable communication and data transfer within London, and between London, the rest of the UK and globally" and "…support ubiquitous networks – those supporting use of a range of devices to access ICT services beyond desk-based personal computers.." Furthermore, at paragraph 4.57, the Mayor states the intention to "…support competitive choice and access to communications technology, not just in strategic business locations but more broadly for firms and residents elsewhere in inner and outer London, and to address e-exclusion amongst disadvantaged groups."

Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing Telefónica and Vodafone to provide enhanced high-quality coverage to the surrounding area.

Local Plan

Most relevant to the proposal is policy LP 33 of the Local Plan. This policy deals specifically with Telecommunications and, for ease of reference, is copied in full below:

Telecommunications

The Council will promote the enhanced connectivity of the borough through supporting infrastructure for high speed broadband and telecommunications.

Applications for telecommunications development (including for prior approval under Part 16 of the General Permitted Development Order, or any other such future Order) will be considered in accordance with national policy and guidance and the following:

1. The applicant will need to submit evidence to demonstrate that all options for sharing of existing equipment, including with other operators, and erecting masts on existing tall buildings or structures, have been fully explored before considering the erection of new structures or facilities.

2. Visual impacts of telecommunications proposals should be minimised, in line with policies on Local Character and Design, particularly on roof tops.

3. The applicant has demonstrated that the development will operate within the International Commission on Non-Ionizing Radiation Protection Guidelines for public exposure.

The proposal complies with this policy for the following reasons:

- The proposal utilises an established communications base station which is shared by two operators. Using the site negates the need for an additional installation in the area, which was an alternative.
- The additional impact of the development has been kept to an acceptable level by utilising a slim and unfussy design of pole, coloured the same as the current pole. With the small height increase, any additional impact would not be sufficient to harm visual or residential amenity.
- A certificate is included with the application confirming compliance with ICNIRP guidelines.

Also relevant is policy LP 8 which deals with Amenity and Living conditions. This policy states: *"All development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties"*. Use of an established site negates the need for an additional base station in this predominantly residential area, and the design ensures impact will be minimal, thus ensuring amenity is protected.

Conclusion:

This application involves the upgrade of an exsisting telecommunications site. In line with best practice for telecommunication development, the re-use of existing sites is first priority when improving or installing telecommunication infrastructure. The upgrade to the site involves a small increase in height and width. The nature of these changes stops the need for a new telecommunications site in the area.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy, the proposal is sympathetically designed, it minimises the number of installations and has a high quality of design. It would enhance the provision of local community facilities and services and would protect visual and residential amenity.

Confirmation that submitted drawings have been checked for accuracy

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Signed:		Date:	19/07/19
Position:	Graduate Acquisition Surveyor	Company: (on behalf of Cornerstone and above operator)	Waldon Telecom Ltd