

Our ref. 78217/Trainline/MP

Date: 23 July 2020

Chief Planning Officer
Richmond Borough Council
Planning, Development Control
2nd Floor Civic Centre
Twickenham
TW1 3BZ

avisonyoung.co.uk

Submitted via Planning Portal

Dear Sir or Madam,

**PRIOR APPROVAL APPLICATION FOR TELECOMMUNICATIONS
INSTALLATION AT OLD MORTLAKE BUS DEPOT, SOUTH WORPLE WAY,
MORTLAKE, RICHMOND UPON THAMES, LONDON, SW14 8PZ
(NGR: E 520986 /N 175751) (SITE REF: 78217)**

Avison Young are planning consultants acting on behalf of EE Limited to submit the prior approval application contained herein for the installation of a new telecommunications base station as proposed below.

Description of Development:

Installation of 1no 12.5m alpha pole with 2no 300mm dishes, 3no equipment cabinets and associated ancillary works thereto.

Enclosed you will find a prior approval application prepared on behalf of EE Limited who are licensed to provide a Cellular Network based upon the Global System for Mobile (GSM) standard and Universal Mobile Telecommunications System (UMTS) within the United Kingdom.

The supporting documents submitted with this application are as follows:

- Application Form (as generated through Planning Portal)
- Drawings 78217_OLD MORTLAKE BUS DEPOT_001, 003, 004_A2
- Planning Statement (Design and Access Statement)
- Site Specific Supplementary Information
- ICNIRP Certificate
- Connected Future Excerpt
- ESN Briefing Note
- Coverage Plots

The application fee of £462 will be paid via the Planning Portal.

We trust you will find the enclosed information sufficient to register and validate the application. Should you require any further information, please contact me on the below details.

Yours sincerely,

A handwritten signature in black ink that reads "M. Poon". The signature is written in a cursive style with a large, looped 'M' and a trailing 'Poon'.

Mandy Poon
Assistant Planner
Telecoms
Mandy.Poon@avisonyoung.com

Avison Young
For and on behalf of EE Limited

1. DESIGN AND ACCESS STATEMENT

The following design and access statement is enclosed in support of this proposal and demonstrates the general development principles that have been adopted in the final detailed design of this proposal.

1.1 HISTORY & BACKGROUND

Everything Everywhere Limited is a 50-50 joint venture between Deutsche Telekom and France Télécom and was formed in 2010 through the merger of their respective T-Mobile (UK) and Orange U.K. businesses. On 3 September 2010, Everything Everywhere announced that Orange would join Mobile Broadband Network Ltd (MBNL), the joint venture management company formed in December 2007 between T-Mobile UK Ltd and Hutchison 3G UK Ltd (H3G UK). In 2016, Everything Everywhere was chosen to work in conjunction with the Home Office to deliver the Emergency Services Network (ESN), which will deliver a smarter, better and cheaper communications capability.

The proposed telecommunications installation is part of a nationwide project to improve the operator's signal coverage along railway routes where service is currently unsatisfactory. These proposed network improvements will target areas where customers often experience signal shortfalls and will also offer better coverage to local communities. It is evident that mobile phone usage has grown exponentially over recent years as more than 90% of the population now own a mobile phone. Customers expect to be able to use their mobile phones and tablets in all locations as these devices have become intrinsic to our personal and professional lives. UK operators are continuously trying to improve their network infrastructure in order to adapt to the changing environment and keep up with customer demands.

As part of EE's ongoing network programme, there is a requirement for 3G and 4G improvements to provide better coverage to the railway line which runs through this area of Mortlake and the surrounding local community. At present there is currently little or no coverage along this section of railway meaning that customers often experience dropped calls from the weak signal. The proposed works will also provide improved coverage for local residents, businesses and visitors to the area. This is illustrated in the coverage map in the Technical Justification section (Coverage) of this document. The telecommunications site proposed herein will serve as an important cell between Mortlake Train Station and Barnes Train Station to improve signal quality within the area and will also increase the service capacity to customers within this area including residents and visitors.

Site Selection

The applicant has adopted a sequential approach to site selection which is encouraged in the Code of Best Practice for Mobile Operators and the NPPF. Due to the nature of the project, the target coverage area in each location focuses on small and localised sections of the railway in order to create effective signal propagation. Therefore, the most ideal locations for telecoms equipment would be those positioned closest to the tracks and centrally within each search cell – this ensures that optimal coverage and capacity can be provided.

Efforts have been made to utilise existing telecommunications sites wherever possible to prevent the proliferation of base stations. In this instance there was no suitable existing base station in the search area that could be upgraded to accommodate the required technologies to achieve the operator's needs. As a result, there was a requirement to identify alternative options for a new base station.

In the selection process of this application site, the applicant has taken into account the site's effectiveness within the overall network on balance with design considerations for its siting and appearance. A number of alternative options were identified which are also listed in the SSSI document. Each option has been discounted in favour of the application site for a variety of reasons which are detailed in this accompanying document.

Alternative sites considered and not chosen:

Discount Option	NGRs	Reasons for Discount
Existing Site – EE 50278	522402 176642	Existing mast is located outside the search area in which a proposed upgrade would not provide sufficient coverage to the target area given the distance to the optimal cell centre and density of surrounding trees/buildings. Site is therefore discounted on technical grounds.
Existing Site – EE 59331	521741 176429	Existing mast is located outside the search area in which a proposed upgrade would not provide sufficient coverage to the target area given the distance to the optimal cell centre and density of surrounding trees/buildings. Site is therefore discounted on technical grounds.
Existing Site – EE 14102	522250 175500	Existing mast is located outside the search area in which a proposed upgrade would not provide sufficient coverage to the target area given the distance to the optimal cell centre and density of surrounding trees/buildings. Site is therefore discounted on technical grounds.
Existing Site – EE 13777	520516 173363	Existing mast is located outside the search area in which a proposed upgrade would not provide sufficient coverage to the target area given the distance to the optimal cell centre and density of surrounding trees/buildings. Site is therefore discounted on technical grounds.
Existing Site – EE 50279	523180 175852	Existing mast is located outside the search area in which a proposed upgrade would not provide sufficient coverage to the target area given the distance to the optimal cell centre and density of surrounding trees/buildings. Site is therefore discounted on technical grounds.
Existing Site – Network Rail GSMR	521957 175760	Existing Network Rail mast is not a shareable structure as Network Rail does not allow the occupation of other licensed operators due to potential interference with their network. Site is therefore discounted on technical grounds.
Existing Site – VF Site Outside Old Mortlake Burial Ground	521126 175716	This site option relates to the allowed appeal for a Vodafone installation (Ref: APP/L5810/W/17/3184353) where the equipment cabinets are currently in situ but the proposed monopole has not been installed to date. A proposed mast share would require a significant redevelopment to incorporate an installation of increased scale, height and bulk in order to sufficiently achieve the technical objectives of both operators. This is necessary when considering the presence of tall trees which are adjacent to site. Additionally, there is insufficient land space within this footpath for site expansion without causing detrimental impact to the free flow of pedestrian movement along this highway. This location has thus been discounted in favour of the progressed location which is notably outside the Conservation Area and will of appropriate scale away from the public footpath.

New RT – Former site of Barnes Hospital	521202 175668	This area is expecting a large redevelopment scheme so future of the land is presently unknown. Site is therefore discounted on buildability grounds.
New RT – Various Buildings	Various	No suitable rooftops within the search area due to high density of residential properties and lack of flat roofs. Buildings with pitched roofs are structurally unable to accommodate telecoms equipment.
New GF/SW – White Hart Lane Railway Crossing	521378 178769	Land is owned by Network Rail. Site is discounted on technical grounds due to potential radio interference with Network Rail equipment as operators are required to be a minimum of 30m away from a Network Rail signal box to ensure health and safety.
New GF/SW – Allotments, south of Railway Slide	521510 175809	There is insufficient land space to accommodate a telecommunications base station without impeding on the normal business operation of the land. Site is therefore discounted on buildability grounds.
New GF/SW – 97 White Hart Lane	521395 175763	Area consists of a new housing development where there is insufficient land space to accommodate a telecommunications base station. Site is therefore discounted on buildability grounds.
New GF/SW – Jcn White Hart Lane & North Worple Way	521323 175817	Pavements along this highway are too narrow to accommodate a telecommunications installation and would likely impact on the free flow of pedestrian movement at the detriment of highway safety.
New GF/SW – Vine Road Recreation Ground	521812 175778	Site option is located on the boundary of the search area in which a proposed installation would not provide sufficient coverage to the target area given the distance to the optimal cell centre and density of surrounding trees/buildings. Site is therefore discounted on technical grounds in preference for the selected option.

1.2 CONSULTATION

The site subject to this application is a revised proposal following a recent refusal under the application reference 20/1206/TEL. In light of this outcome, the applicant reviewed their technical objectives and was able to propose a revised scheme, following some technical compromises, in order to address the reasons for refusal. This new proposal seeks to install a 12.5m brown alpha pole, which is in line with pre-application feedback received from the pre-app meeting as well as the written response (dated 14th June 2019, LPA Ref: 19/P0117/PREAPP).

With reference to the initial pre-application discussion which took place between March and June 2019, reference was made to the allowed Vodafone appeal (APP/L5810/W/17/3184353) located outside Old Mortlake Burial Ground in which the proposed 12.5m brown alpha pole was allowed as it was determined to be of appropriate siting and appearance that would result in less than substantial harm on the Conservation Area. Given this outcome, the planning officer concluded that a proposal at Mortlake Bus Depot, as depicted in the submitted plans, would pose a similar argument in line with the appeal decision. It was concluded that the application site would be the most suitable option amongst the alternatives put forward as it would not be directly sited directly in front of residential dwellings. Though there are houses located within close proximity, it was not considered that neighbouring amenities would be unduly affected by the proposal.

Following on from this, it was further established that the site would be visible from within Queens Road Mortlake Conservation Area to the south of the railway however; the

planning officer acknowledged that there are similar attributes with the allowed appeal which can be applied in support of the proposed development. It is also of note that the appeal site outside the Burial Ground is found within a designated Conservation Area whereas the application site is not. In this regard the officer also acknowledges that the application site is less sensitive. The written response thus concluded that a proposed 12.5m monopole installation could be supported provided it would be coloured brown to resemble a telegraph pole and would be the lowest possible height to achieve technical objectives.

Upon receipt of this advice, the applicant reviewed the technical requirements of the area and concluded that a minimum mast height of 15m would be required to achieve the necessary coverage and capacity levels. Given that the location was found to be broadly acceptable in principle, the applicant decided to submit a Prior Approval application for this design scheme. This application was subsequently refused on 23rd June 2020 (LPA Ref: 20/1206/TEL) for reasons including matters of siting and appearance. With regards to the delegated report, the planning officer, Jack Davies, concluded that the proposed 15m monopole would incur detrimental impact on Queens Road Conservation Area due to its siting, height and design. In light of this determination, the applicant was able to make technical compromises to revert to a 12.5m brown alpha pole which was deemed to be broadly acceptable during the pre-application stage. Consequently, it was thought that a resubmitted application would be appropriate given that there is existing precedence set by the allowed appeal located nearby and the reasons for refusal have been sufficiently addressed. For the avoidance of doubt, it is reiterated that the appeal location is not a shareable site that can accommodate the required technologies of both operators as explained in the above table.

On 9th July 2020, consultation letters were issued to the local planning authority, local ward councillors, local MP and schools/nurseries in close proximity to the site as explained in the Site Specific Supplementary Information document. Correspondence to the local planning authority was directed to the case officer, Jack Davies, who was assigned to the refused application to request further comment on the revised proposal. To date no responses have been received from all the above parties. Should any correspondence be received these will be forwarded to the local planning authority for their reference.

The application falls within Permitted Development Rights as the monopole is less than 20 metres on highways land. A prior approval application is therefore submitted on this basis.

1.3 DESIGN

1.3.1 The Proposal

The application site is situated on the northern side of North Worple Way adjacent to a bus depot building which is set back from the public highway. To the south of North Worple Way is the railway line which runs from east to west between Mortlake Train Station and Barnes Train Station. The surrounding area is predominantly residential in nature though the location within a busy area of Greater London presents an urban characteristic which is enhanced by the industrial characteristics of the bus station and railway infrastructure. In the immediate vicinity there are other items of street furniture in the form of lighting columns, road signs, bollards and planting. Due to the site's central location there is a high density of mobile users in this area meaning the proposed base station will serve as an important cell within the overall mobile network to provide high quality mobile signal.

The site is not situated within recognised Article 2(3) land however; Queens Road Conservation Area is located to the south of the railway opposite the application site. Additionally, there are no notable listed buildings nearby which would be directly impacted by the proposal due to the site's distance and proximity to these sensitive façades.

The proposal is for the installation of a new telecommunications base station comprising the installation of a 12.5m high monopole which will accommodate antennas encased within a GRP (Glass Reinforced Plastic) shroud at the top of the monopole and 2no 300mm dishes with associated ancillary works including 3no equipment cabinets. The monopole will be painted brown and the cabinets will remain in its manufactured light grey form to aid the site's assimilation into the environment and is in line with pre-application advice.

The scheme falls within the parameters of General Permitted Development Order (England) 2016 (as amended) and therefore an application to determine whether Prior Approval is required is submitted herein.

1.3.2 Design Considerations

Siting and Appearance

In a general context the applicant will consider matters of siting and appearance whilst balancing technical objectives in order to achieve a design that remains sympathetic to visual amenity in respect to existing views and vistas, residential amenity, and preservation of any nearby heritage assets. With reference to these important features the applicant aims to identify a suitable location that does not cause significant detrimental harm. It is imperative that a fair balance is struck between these factors as a means of preserving the existing character and natural enjoyment of any given area.

The applicant has sought to cause as little impact on the visual amenity of the area as possible whilst also ensuring that sufficient technical requirements are achieved. The operator's general practice will always endeavour to propose the minimum height and least amount of equipment necessary to sufficiently achieve the desired coverage levels and it should be recognised that any reduction in height or equipment would compromise the site's effectiveness within the network. Efforts have been taken to site proposed masts in regions with similar vertical features and more hidden areas which are less prominent to the naked eye. The minimum height and width of each mast has been proposed to incur the least amount of visual impact whilst also ensuring that each location can fulfil the operator's technical requirements. The masts need to be higher than nearby trees and buildings so that signal coverage can reach the overall target area as these signals can weaken as they pass through infrastructure. Proposed equipment cabinets are also kept to a technical minimum in order to reduce clutter in any given area and are also painted to match the immediate surroundings to aid in ameliorating its presence in the street scene wherever applicable. A further explanation of the application's technical justification is explained in a later section.

The proposed height subject to this proposal has been reduced to 12.5m following technical compromises and is the least possible height that allows sufficient coverage to the overall target area when taking into account the density of buildings and other infrastructure in the surroundings. In order for optimal signal propagation the antennas require sufficient degrees of separation from surrounding features to ensure a clear line of sight towards the target area. Coverage will be improved for nearby residents, visitors and the Emergency Services as a result.

It is acknowledged that the installation of new telecoms equipment will to a degree be recognisable in any given environment however, the acceptability of this proposal should be determined on whether any detrimental harm is demonstrable when balanced against the public benefits to be provided. To echo the consultation comments mentioned above, the proposed mast would be read within a landscape in which a telecoms installation of this kind is not uncommon given the demand for mobile coverage in today's society. The site will be read in conjunction with the bus station and railway infrastructure which is of an industrial character that is well suited to a scheme of this kind. This is a shared context that was discussed in the aforementioned appeal decision whereby the Inspector stated that the highway, buildings and railway give much of the surrounding area a developed suburban character and appearance that includes gantries, footbridges and signals along the railway and telegraph poles and lighting columns along the highway. Though it is important that each application site is assessed on its own merits, the contents of this appeal case contains some transferable points regarding the existing setting and character of the area which can be extended and applied to this proposal.

In addition to this, the proposed monopole offers a slim-lined appearance and will be coloured brown to resemble a telegraph pole in which there are existing poles in close proximity to the application site. In this regard the proposed development will be read in conjunction with neighbouring street elements including lighting columns and road signs to soften the site's visual impact within the street scene as there are similar items of vertical emphasis. The monopole is designed to be slim to ensure that a bulky appearance is not presented which would be more visually prominent. Given the setting of the local bus station and presence of other similar tall and thin street furniture, the proposed development is not considered to be overly noticeable. Moreover, the low level equipment cabinets will be positioned in the same location as the previous application in which the case officer noted no objections in the delegated report. This is also applicable in relation to highway safety as the equipment will not be positioned within the pedestrian highway, and it is also noted that the Council's transport officer and Transport for London offered no objections to the previous application.

When taking views from the wider area, the proposed monopole is capable of being absorbed within the present surroundings in relation to the existing street furniture and extent of screening from adjacent buildings. In addition to the slim diameter of the pole, surrounding buildings will allow a degree of screening towards the mast to reduce its visibility, particularly in terms of the mast's lower sections. Given this circumstance, it is argued that the extent of visibility, coupled with the reduced height of the mast, is limited to a localised area which lessens the overall prominence of the site. Whilst the height of the monopole may be greater than that of the adjacent building and is recognisable at a short distance, this would not be particularly apparent in the wider area due to the presence of the nearby railway and its equipment, the footbridge, the trees and the distance that it would be located from buildings and other structures. This is notably a similar setting to that of the allowed appeal site which was considered acceptable.

With regards to residential amenity, it is considered that the proposal would not affect the enjoyment of light to local residents given the narrow diameter of the pole, the low level height of the equipment cabinets and general distance to nearby properties. Despite the concentration of residential properties in the area, the proposal is considered to be sympathetic to residential amenity as its location is the most appropriate option within this search area; the setting of the bus station and backdrop of railway infrastructure creates an industrial character whereby transport and telecoms installations are viewed collectively, which induces the least harm to the wider community. This sentiment is shared in the planning officer's delegated report of the refused application as the scheme was not considered to be in close enough proximity to cause harm to residential amenity given the slim nature of the monopole.

Moving on from this, in relation to Queens Road Conservation Area located to the south of the railway, it should firstly be recognised that the applicant has made efforts to progress a site option that is away from the conservation area. The application site is still considered an appropriate location when also taking into account the limited alternative options within this cell area. In a similar vein to the Burial Ground appeal site, which is notably within a designated conservation area, the Inspector concluded that there is less than substantial caused to the significance of this heritage asset which is a transferable point that should be considered in the assessment of this application. Within the context of the bus station and railway infrastructure, the proposal is capable of assimilating into the immediate environment so as not to cause an overly prominent appearance. In conjunction with the minimalistic pole design, this proposal seeks protect the setting and character of this heritage asset. Indeed, the application site and the conservation area are separated by a railway divide which is flanked by an approximately 2m high wall and vegetation which further enhances this argument. Overall it is evident that less than substantial harm would be caused as a result of this proposal.

These points are illustrated in the below screenshots showing views around the bus station whereby the application site will be partially hidden behind the natural and built form that surrounds it. Though the mast may be seen from wider vantage points due to the required mast height, its presence within this area will be partially disguised when taking into account the presence of other street items as previously mentioned. Recognition should be given to the efforts made by the applicant to progress a reduced mast height in accordance with the Council's pre-application advice to aid the site's integration in this area whilst also fulfilling the technical requirements of the overall objective.



In summary the proposed design is considered to be respectful of the surrounding features and does not cause a detrimental harm to the visual amenity of the immediate environment. The siting and appearance of this proposal is therefore within the boundaries of acceptability as it will cause minimal interruption to the current landscape.

1.3.3 Planning Policy Considerations

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that Local Planning Authorities should determine proposals in accordance with development plan policies, unless material considerations indicate otherwise. Material considerations may include, inter alia, central government guidance, High Court and Inspector's decisions etc.

1.3.4 Local Planning Policy

The following local planning policies are relative and have been considered in the submission of this application. It is argued that the proposal is in accordance with the below policies which promote high-quality connectivity and supports new telecommunications infrastructure when it can be demonstrated that the design and siting of the base station is respectful to its surroundings.

Local Plan (Adopted Jul 2018 – interim report)

Policy LP1 – Local Character and Design Quality

In accordance with this policy, the proposed scheme is of a high urban design quality that has been sited and designed in a respectful manner towards any nearby heritage assets. The existing context and surrounding environment has been taken into consideration to propose a scheme which satisfies technical requirements whilst also being appropriate to the local character and setting of the area. The scale of equipment is the minimum amount required to allow maximum signal propagation given the land available for use.

Policy LP3 – Designated Heritage Asset

The applicant recognises it is important to preserve and enhance the character and setting of sensitive designations such as conservation areas and listed buildings. As discussed in the siting and appearance section of this statement, the base station will assimilate into its environment and not overly recognisable or prominent due to its positioning, design and minimalistic profile. It is considered that the proposal is in line with this policy in this regard.

Policy LP5 – Views and Vistas

In support of this policy, the base station will have a relatively small and thin profile on the skyline and surrounding landscape which the local authority should appreciate is necessary and unavoidable given the site's use and operation. However, the slim and minimalistic visual appearance of the base station supports the principles of this policy as the wider environment is not demonstrably impacted by the minor development of this proposal. The required mast height has also been kept to a technical minimum.

Policy LP8 - Amenity and Living Conditions

In accordance with this policy, the application has demonstrated that neighbourhood amenity and the living conditions of residents will be protected as a result of the development. The proposed works will occupy a small footprint in which the equipment will present a minimalistic profile that does not impact the existing daylight and sunlight conditions for neighbouring properties. This is further enhanced when considering the application site's distance away from nearby dwellings.

Policy LP33 – 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 rooftops.*
- 3. The applicant has demonstrated that the development will operate within the International Commission on Non-Ionizing Radiation Protection Guidelines for public exposure.*

In accordance with the council's telecommunications policy, the demand and necessity of this base station to improve mobile signal has been evidenced following the sequential approach to site selection which has been demonstrated earlier in this statement. The design has been chosen sensitively to take into account the local character of the area and is also compliant with ICNIRP guidelines. The proposal will improve the provision of mobile coverage and will be an important cell within the overall network and these public benefits should be of material consideration in the assessment of this application.

Policy LP40 – Employment and Local Economy

With reference to this policy, the advancement in the telecommunications network here will help to support the Council's aim of creating a diverse and strong local economy that continues to grow. In particular, an improvement in the telecommunications network will help to facilitate flexible workspace and co-working which are encouraged by the Council.

1.3.5 National Planning Policy

This legislation was formally adopted in July 2018 and replaces the previous version which was introduced in 2012.

In relation to this policy the following sections are relevant in determining this application:

Section 2 – Achieving Sustainable Development

Paragraph 7 – “The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”

The NPPF also encourages the achievement of sustainable development which can provide public benefits to building stronger and more competitive economic areas, as well as enhancing social communities through increased communication and connectivity.

Section 4 – Decision-Making

Paragraph 38 – “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. Decision-makers at every level should seek to approve applications for sustainable development where possible."

Section 6 – Building a strong, competitive economy

Paragraph 80 – "significant weight should be placed on the need to support economic growth and productivity... this is particularly important where Britain can be a global leader in driving innovation."

Section 10 – Supporting high quality communications

Paragraph 112 – "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."

In relation to these paragraphs, the Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, and sets out a delivery programme to make the UK a leader in "artificial intelligence and big data". The improvement of telecommunications capacity is imperative to allow for areas to be connected, and is essential for economic growth.

Paragraph 113 – "The number of radio and electronic communications masts, and the sites for such installation, 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... Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate."

In relation to this paragraph, it is demonstrated that a sequential approach to site selection has been adopted to ensure that existing telecommunications installations have been explored in the first instance to prevent the proliferation of masts. In order to achieve the operator's objectives, a new site was required and has been designed in consideration for its surroundings as explained in previous sections.

Paragraph 114 – "Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:

- a) They have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*
- b) They have considered the possibility of the construction of new buildings or other structure interfering with broadcast and electronic communications services."*

Paragraph 115 – "Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- a) The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed*

- near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and*
- b) For an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or*
 - c) For a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met."*

In relation to this paragraph, the site is not located within 3km of a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area. Consultation letters were issued to nearby schools/nurseries in close proximity. As the proposal is for the installation of a new site, the applicant sought formal pre-application feedback for the proposal. An ICNIRP certificate is provided with this application to confirm that the proposal will not exceed International Commission guidelines. Alternative sites have been explored in this search area and are listed in the SSSI document.

Section 12 – Achieving well-designed places

Paragraph 124 – "Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."

In relation to this paragraph, the application seeks to install a new telecommunications site located along North Worple Way near the railway line and the proposed equipment is the least amount possible to allow the site to transmit sufficiently; we therefore consider this design to be respectful to the character of the area. Although the introduction of new additional items will to an extent be recognisable features of this street scene, efforts have been made to limit the extent of visual impact on the surrounding amenity, and have taken into account the reasons for refusal for the previous application. The height of the proposed monopole is required to allow the coverage to reach the target area and it should be understood that a reduction in height (or equipment) would significantly compromise the effectiveness of this site. The new base station will serve the railway line, local area of Mortlake as well as the Emergency Services Network.

Section 16 – Conserving and enhancing the historic environment

Paragraph 189 – "In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary."

In relation to this paragraph, the relevant historic environment records are referred to within this document within the Heritage Statement section and the impact of the proposal on these historical and natural assets have also been discussed.

Paragraph 196 – "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

It is considered that the proposal is in accordance with this paragraph as the application has been designed sensitively to be respectful of these recognised assets.

To conclude, the applicant therefore considers the proposal to be in accordance with local and national planning policies.

1.3.6 London Plan 2017

The Plan recognises the strategic importance of providing necessary infrastructure, including modern communications networks that London requires to secure its long-term economic growth. The proposed works will improve digital connectivity to the benefit of Londoners and businesses. The site will ensure a high level of connectivity is sufficient to meet the rising demands of reliable data and services of the public as well as safeguarding the reduction of coverage within the surrounding area. This application is therefore an integral element in securing the Mayor's vision for the delivery of modern communications networks across London.

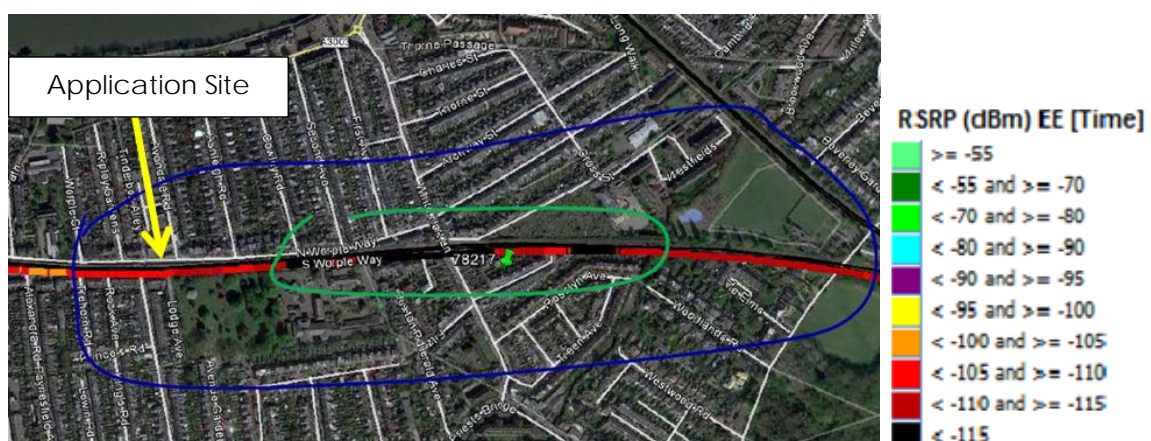
1.3.7 Technical Justification

In the assessment of this application, material weight should be given to the public benefits that will be provided to local residents and visitors in this area. The site will form part of an improved coverage network which will allow for faster download speeds and fewer calls to the dropped.

Coverage

The licence granted to EE demands that strict coverage qualities are met nationwide. It is essential that the benefits of mobile phones are available across the population. Mobile networks are constantly reviewed to ensure that there is adequate coverage and capacity to meet customer demands. In the current environment there is an expectation for signal coverage to be available at home, in the workplace, while shopping, enjoying leisure activities or in transit.

The National Infrastructure Commission is a non-ministerial government department responsible for providing expert advice to the Government on the pressing infrastructure challenges facing the UK. Their report 'Connected Future' (published December 2016) points out the importance of providing reliable mobile coverage on our rail routes. An excerpt of this report has been submitted as part of this application.



The above map represents the target coverage area where improved telecoms infrastructure is sought. With reference to the colour key above, it is the operator's objective to eliminate areas of poor network coverage (illustrated in red/black). The optimal target along these sections of railway is green as represented in the key. The site subject to this application will address coverage issues along this train line. Coverage plots have also been submitted with this application to illustrate the necessity of this

proposed base station and the expected extent of high speed coverage to be provided.

Ideally, a mast located adjacent to the railway line and near the centre of the search area will offer the most suitable solution to achieving the required coverage levels however this will also depend on a number of different circumstances. The installation proposed herein will allow for optimum coverage to be achieved in this locality.

Contributing factors that have been considered in the selection of this site include:

- The proposal's siting and appearance within the surrounding environment;
- The height and density of neighbouring features such as trees and buildings; and
- The lay of the land (i.e. masts on higher ground offer better signal coverage).

With reference to the above map, the operator will take into account the size of the target area and the number of mobile users when determining the minimum mast height that is required. The red and black coloured areas represent sections of railway where this is currently very little signal coverage and given the large amount of residential properties within the cell the number of potential users is high. Additionally, it should also be noted that signal strength can weaken as it passes through infrastructure such as buildings and trees which is of relevance in this case due to the density of properties meaning that a taller mast height will compensate these constraints by reaching a further coverage area. Given this context, the mast height is necessary to provide mobile phone signal to this particular area.

The antennas will be 11.5 metres above ground level (to antenna centre line) which is necessary to avoid interference with the adjacent trees/buildings to allow coverage to reach the overall cell area. It is of note that a reduction in height will have a damaging impact on the signal propagation of the proposed development.

Quality

In order to ensure there is sufficient coverage within buildings such as homes, shops, offices etc. the radio signal has to be of adequate strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, which are sometimes less than 1 km apart. The improvement of 3G and 4G signal in this area will encourage economic advancement in accordance with the NPPF which seeks to develop connected environments.

Capacity

The increase of telecommunications masts across the country in recent years is an inevitable consequence of the continued growth of mobile phone usage. More sites are required to accommodate the increasing demands of each mobile user for tasks such as video or music streaming. Each cell or base station is limited to handling a finite number of calls meaning that areas of high usage will require additional cells to meet network demands and avoid congestion.

The Radio Implication of the Site

Radio signals are transmitted through the network by using fixed links at such frequencies that necessitate an uninterrupted line of sight. To achieve this, the installation must reach a sufficient height above surrounding buildings and trees. The installation must also be in a position to provide strong radio coverage to the target area that can also be received inside buildings.

The radio planning tool identifies deficiencies in the network and predicts the location from which the optimum coverage will be provided. This area is referred to as the search area or cell centre which is roughly indicated by the circles in the above map.

The identification of poor coverage areas are often from customer led demands through complaints of dropped calls and reduced services. The proposed installation subject to this application stems from this process where it is imperative for mobile operators to provide high quality coverage to its customers. This is achieved through the improvement of existing network infrastructure and introduction of new base stations to fill in blank spots.

1.3.8 Health and Safety

The proposal for this site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines and therefore Health and Safety concerns should not be a planning consideration. An ICNIRP certificate is submitted with this application.

2. ACCESS

Access to the site will remain unchanged, as will the on-going traffic visiting the site. We do not envisage additional maintenance visits incurring, and being new equipment, the likelihood of requiring visits for repair is remote. Should maintenance be required there will be sufficient space around the equipment for engineers to work on site without impeding the normal operation of the surrounding land.

3. CONCLUSION

A requirement for improved network coverage has been identified in this area. This is an installation of a new site which will provide essential services for users of the rail, residents and businesses within the immediate vicinity, and the Emergency Services. The proposed works have been designed sensitively in consideration for the character and appearance of the surrounding area in which the least amount of works has been proposed to minimise the visual impact of the proposal.

The applicant considers the proposal to be an acceptable development which should be viewed favourably by the local planning authority.