SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Ilderton Road	Site Address:	Ilderton Road Bermondsey Southwark London SE16 3EQ
National Grid Reference:	E534966, N178348		
Site Ref Number:	76607	Site Type:[1]	Macro

2. Pre-Application Check List

Site Selection

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		No
If no explain why: No register available.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: This installation is required to replace the existing rooftop base station at Credon House, on the junction of Varcoe Road and Verney Road, London, SE16 3FS. There is no application available to view on the Council's Planning Portal which relates to the original installation of the apparatus at Credon House. However, it is clear from online mapping tools that telecommunications apparatus has been in situ on the rooftop since at least 2009. In order to avoid the creation of a large 'coverage gap' within the local area, for the first time in at least 12 years, a new, permanent base station must be deployed prior to the removal of the existing apparatus. As there is an existing base station already in situ, which provides network services to the local area, there is a very specific target area which needs to be serviced in terms of continued, permanent network coverage. No alternative, existing installations would provide coverage to this area. Therefore, a new site within the area is required to replicate, and enhance mobile coverage and service across the wider area.		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	11/5/2021
Name of contact:	

[1] Macro or Micro

Summary of outcome/Main issues raised:

A pre-application consultation letter was issued to The London Borough of Southwark Council, as well as the Council's Highways Team, on 11th May 2021. This letter contained details of the proposed installation of this replacement network cell, as well as design drawings. Feedback was requested from the Council.

An acknowledgement letter was received from Daniel Cooklin-Smith, of the Council's Planning Team, which stated:

"The proposed development appears to comply with Part 16 of the GPDO. However, this is the officer's opinion and will require a proper assessment in order that the council can review this proposal's merits with regard to siting and design".

No further comment was offered in regard to the proposed scheme.

As of the date of this planning application, no formal response has yet been received from the Council's Highways Team.

Community Consultation

Rating of Site under Traffic Light Model:		Amber	

Outline of consultation carried out:

A pre-application consultation letter was issued to the local Ward Councillors of the Old Kent Road Ward. Detailed design drawings of the proposal were provided alongside the consultation letter and feedback was requested.

As part of the pre-application consultation exercise, neighbour notification letters were also issued to the following residential properties:

- 1,3,5 Cranswick Road, SE16 3BJ;
- 2,4,6 Cranswick Road, SE16 3BH;
- 1,3,5 Bramcote Grove, SE16 3BN;
- 2,4,6 Bramcote Grove, SE16 3BW.

Summary of outcome/main issues raised (include copies of relevant correspondence): A response was received from Councillor Livingstone on 11/5/2021, in which he objected to the proposed scheme. Councillor Livingstone stated that he believed that 20m (in height) was an excessive height for such a development. A response was issued to Councillor Livingstone on 18/5/2021 which provided further details on identifying a location for a replacement base station within the local area, as well as additional network data which outlined the ever-increasing public dependence on mobile networks, and the acceptance of 20m monopoles in similar locations across the country. No further response was received from Councillor Livingstone prior to the submission of this application. No formal response was received from either of the other Ward Councillors. Additionally, as of the date of this application, no responses were received from the local residents who were consulted as part of this pre-application exercise.

School/College

Location of site in relation to school/college (include name of school/college): Galleywall Primary School is situated approximately 230 metres from the application site.
Outline of consultation carried out with school/college (include evidence of consultation): A pre-application consultation letter was issued to: • Galleywall Primary School, Galleywall Primary, London, SE16 3PB. NB – a pre-application consultation letter was issued to both the Headteacher of Galleywall Primary School, as well as the Chair of Governors.
Summary of outcome/main issues raised (include copies of main correspondence): As of the date of this planning application, no formal response has yet been received from Galleywall Primary School.

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation

Will the structure be within 3km of an aerodrome or airfield?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: N/A – There are no active airfields within 3km of the application site. Therefore, there is no requirement to issue an Aerodrome Notification.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	4/6/2021 – Proof of Delivery of Developers Notice included within the application	

3. Proposed Development

The proposed site:

This proposal is required to provide continued mobile coverage to the local area for EE and H3G (known as the operator 'Three'). Network coverage is currently provided by a nearby rooftop installation, which is due to be removed. A permanent, replacement base station must be deployed prior to the removal of the existing installation, or the area will suffer from a loss of communications and data services for EE and H3G. Additionally, the wider mobile networks for both operators will be disrupted if a replacement site, which adequately replicates the lost coverage, cannot be identified and integrated into the network at the earliest opportunity.

EE and H3G have a radio base station located on the rooftop of Credon House (NGR: E534911, N178102), approximately 250m south of the application site. This base station provides a considerable level of network coverage to the surrounding area, as shown on the accompanying operator coverage plots.

Figure 1 – Existing MBNL Base Station on the rooftop of Credon House.
Source: Google Maps

This installation is due to be decommissioned and removed from the rooftop, to allow the landlord to progress with large-scale redevelopment plans. As such, if no permanent, replacement, installation is deployed prior to the decommissioning of the existing apparatus, then network coverage will be lost within the local area. The proposed development will address this issue by not only replicating the existing coverage footprint, but providing improved connectivity and capacity via enhanced 3G and 4G services, as well as brand-new 5G coverage for both operators.

The application site, on a wide pedestrian walkway adjacent to Ilderton Road, provides an appropriate town planning solution and will ensure that excellent network coverage is provided to the wider area.

The existing streetlights situated along Ilderton Road provide vertical engineered elements within the local area, as well as road signs and traffic lighting columns – particularly at the nearby junction with Rotherhithe New Road (A2208). Additionally, there are a number of mature trees situated on the same area of pedestrian footway, as well as running parallel to Ilderton Road and Rotherhithe New Road. These trees will assist in filtering public views of the proposed apparatus and ensure that any visual impact is reduced as far as practicable.

Historically, the local area has been considered appropriate for the deployment of telecommunications apparatus.

A 17.9m BT Airwave telecommunications lattice tower was positioned in the north-eastern corner of 79-161 Ilderton Road. There is no evidence on the Council's Planning Portal of when the original application for that structure was submitted, or when it was granted.

However, in October 2003 an application was submitted to the Council proposing the increase of the 17.9m lattice tower up to a height of 28.5m, plus the installation of additional antennas, transmission dish, and ground-based equipment, to allow the site to be shared by O2 (LPA Ref: 03/AP/2019). Permission was granted by the Council in December 2003. As a consequence, the structure was upgraded to 28.5m in height. This 28.5m tower was deployed approximately 200 metres west of the application site on Ilderton Road.

Figure 2 – 28.5m lattice tower on Ilderton Road. Permission was granted in 2003 (LPA Ref: 03/AP/2019). Source: Google Maps

Whilst it cannot be confirmed when the original 17.9m tower was deployed at this location, it is clear that the Council considered a 28.5m lattice tower at this location to be acceptable almost 20 years ago. As will be outlined within this application, our dependence on network coverage and connectivity is at an unprecedented level and is essential to the development of our economies and social interaction. The proposed development is 8.5 metres smaller than the structure approved in 2003 and provides far greater technologies than were available at the time. In 2003, only 2G and 3G coverage was available to consumers. The proposal now before the

Council would ensure continued 2G, 3G, 4G and brand-new 5G network coverage for two mobile Operators.

The Officers Delegated Report for application 03/AP/2019 outlines the Council's decision-making process in relation to the upgrading of the existing 17.9m tower. It states:

"The surrounding industrial/light industrial land, and adjacent railway lines present no natural or built features of any significant aesthetic merit. Consequently, despite the fact that the heightening of the tower will increase its visual prominence when viewed from the neighbouring residential properties on either side of the railway tracks, it is unlikely to create any significant detrimental impacts upon the aesthetics of the immediate area that do not already exist in the form of the current tower".

It should be noted that the 17.9m tower that was considered acceptable at that location, was not a slimline tower which is proposed as part of this application, but rather a lattice tower. A 17.9m lattice tower is considered to be far more visually impacting than a 20m slimline monopole. The Council considered that a 17.9m lattice tower (and then a 28.5m lattice tower) was acceptable within the local area, and these installations formed part of the local streetscene and skyline.

The Officers Delegated Report for application 03/AP/2019 further expands on the Council's assessment of that proposed upgrade. The Report clearly states that the upgrading of the tower from 17.9m to 28.5m (an overall increase of 10.6m) would be unlikely to impact on the aesthetics of the area or the amenities of the surrounding residential properties. Furthermore, the Report states that the taller tower would not threaten highway safety, nor would it represent a danger to the public.

The 'sharing' of the tower is positively received by the Council in application 03/AP/2019, with it being acknowledged that this would *"eliminate the need for an individual tower for each operator"* and that *"the site sharing of the tower and the increased level of coverage provided will boost the quality of telecommunications in the area"*. The proposal now before the Council will also be shared by two Operators (EE and H3G). The Council's assessment relating to application 03/AP/2019 focused on a far more robust, and wider, lattice tower, approximately 50% taller than the scheme now proposed as part of this application, and within 200m of the proposed site on Ilderton Road. It is considered that if that application was deemed appropriate in 2003, the current proposal before the Council, which would provide far greater social, economic and environmental benefits, should also be considered appropriate.

In 2015, an application was submitted to the Council for permission to install a 20 metre high monopole with 6no antennas and 2no transmission dishes at 'Land Next To South Bermondsey Train Station, Off Rotherhithe New Road, South Bermondsey, London, SE16 3JZ' (LPA Ref: 15/AP/3194). This site is situated approximately 155m north east of the application site on Ilderton Road. The Council determined that this development was appropriate for the surrounding area and approved the application is September 2015. Whilst the height of that approved structure is the same as the proposed scheme at Ilderton Road, the design of the apparatus is wholly different. The approved scheme under application 15/AP/3194 required an open headframe, and is therefore far more visible on the skyline than the slimline monopole with 'stacked' antennas, as proposed at Ilderton Road.

Given these two applications (LPA Refs: 03/AP/2019 and 15/AP/3194) were considered appropriate for the local area, by the Local Authority, it is anticipated that similar support will be offered to the proposed scheme at Ilderton Road. The proposed development would provide continuous, and enhanced, network coverage for two Operators, from a structure which is

considered to be far more appropriate for the surrounding area. The specially-designed monopole, with 'stacked' antennas, negates the need for a more robust tower and headframe than those which have been evident across the local streetscape, and skyline, for the last 20 years.

Figure 3 – 20m monopole at 'Land Next To South Bermondsey Train Station'.
Permission was granted in 2015 (LPA Ref: 15/AP/3194).
Source: Google Maps

The height and scale of the proposed development has been minimised to the maximum extent, with a slimline monopole, with 'stacked' antenna, proposed. This development differs from both the traditional, rural, telecommunications installation which would usually be a lattice tower (like 03/AP/2019), often introduced into industrial estates, and also the traditional, urban, telecommunications installation in the form of a telecommunications streetpole (often with a 'bubble' or shrouded headframe).

The new, innovative design of the stacked antennas allows the proposed monopole to be as slim as practicable, and therefore a better option from a visual perspective. Whilst the applicant accepts that the height of the installation will result in a visually intrusive feature on the landscape, the slimline nature of the development will ensure that the visual impact is reduced as far as practicable. When this impact is assessed against the provision of economic, social and environmental benefits that will be brought forward by the proposal, as well as the two nearby installations which the Local Authority assessed and determined as acceptable, there is considered to be significant favour towards approving the scheme. The justification for the height of the proposed installation is that the next stage of technological advancement (5G) will be available from this network cell, providing new cutting-edge coverage for two major mobile Operators to the local area.

The proposed apparatus only serves one function – to provide mobile network coverage to the local area. The equipment has no other function. As such, the appearance of the equipment, and the height of the equipment, is dictated by functionality and technical constraints. Indeed, the relaxation of Permitted Development rights by Central Government in 2017, shows a clear

indication that 20m is now the accepted height for new base stations situated on highways land and immediately adjacent to the public highway.

The ‘siting’ of the proposed development has been carefully selected – set away from residential properties, as far as practicable, and within mature tree cover – as has the proposed ‘design’ – a slimline monopole solution with stacked antennas, rather than a more robust monopole or lattice tower, with a focus on reducing any perceived visual impact associated with this application to the maximum extent.

It is considered that the proposal in front of the Council is acceptable, as this development will ensure network coverage for two mobile operators is provided to the local area, and nullify the impact caused by the removal of services when the existing base station at Credon House is decommissioned. The proposed development will provide 2G, 3G, 4G and 5G network coverage for EE, and 3G, 4G and 5G network coverage for Three. Additionally, this community will be at the forefront of the next generation of technology (5G).

Views of road-users, travelling north on Ilderton Road, will be obscured and filtered by the mature tree cover, which is situated along the pedestrian footway, as well as the curvature of the road itself, ensuring that the proposed scheme will only be brought into short-range views. The lower proportion of the slimline monopole, along with the associated ground-based cabinets, will be suitably screened by the mature tree cover within the immediate vicinity, thereby reducing any visual impact associated with the proposal, as far as practicable.

Views of road-users, travelling west-east from Rotherhithe New Road along Ilderton Road will also be partially obscured and filtered by the mature tree cover which is situated immediately adjacent to the application site. Additionally, the proposed structure will be seen amongst other vertical engineered structures on Ilderton Road, i.e. street lighting columns, road signs, traffic-light columns. This will assist in reducing the prominence of the development and allow the structure to assimilate into the local area with ease.

The immediate context of the area is one of light-retail and commercial properties which are situated on the ground-level units on Ilderton Road, to the north of the application site. There is public parking immediately adjacent to the application site, with approximately 30 parking spaces. This adds to the light-retail and commercial context of the local area. On a wider scale, South Bermondsey Train Station is situated to the east of the application site, with associated trainlines heading in northern and southern directions; the Bermondsey Trading Estate lies to the north; and the Millwall Football Club Stadium (The Den) sits to the southeast. All of these factors, combined, create a context in which a 20m slimline monopole would not look out of place or incongruous within the streetscene.

Whilst the application site may appear to be exposed (in terms of screening) at first glance, the scale and massing of the built environment, as well as the level of mature tree cover within both the immediate, and local, area ensures that the views of the public, and road-users, are obscured and/or filtered. The application site has been specifically selected to ensure that it utilises the natural-, and built-, environment to the maximum extent, thereby reducing its visual impact.

Given the need to integrate a permanent replacement base station, prior to the removal of the existing base station at Credon House, as well as limited options within the established target area, it is considered that the best town planning solution has been brought forward as part of this application.

Ensuring that the current network coverage is replicated is of vital importance, especially given the current circumstances in which the country finds itself; with a significant proportion of the workforce displaced into working from home and increasingly reliant on the existing mobile networks.

It is suggested that the local area has, over the preceding 20+ years, become synonymous with telecommunications apparatus on the skyline, due to the presence of the two nearby structures; x1 28.5m lattice tower, and x1 20m monopole, within 200m of the application site. Should the apparatus be removed from Credon House, without a permanent replacement, the local area will effectively be transported back to a time when there was no operator network coverage for EE and H3G.

It should also be noted that EE have been awarded the contract to provide the Emergency Services Network (ESN). This network is currently provided by Airwave. However, over time, the ESN will be gradually migrated onto the EE network, with EE then isolating their 4G network to accommodate the ESN. Naturally, EE can only isolate their 4G network once base stations are of a level to provide 5G coverage. At that point, EE will provide 2G, 3G and 5G commercial network services and 4G will be switched off 'commercially' and will provide the Emergency Services Network for the Ambulance Service, Fire Service and Police Service. This proposal will be 5G-ready at the point of deployment and it is submitted that the provision of the ESN to this part of Southwark is a material planning consideration, and should be given planning weight when assessing the application.

It is considered that the proposal in front of the Council is acceptable. This development will ensure that continuous network coverage for two mobile operators will be provided to the surrounding area and nullify any network impact caused by the removal of the existing installation which currently services the local area. It is therefore considered that any visual impact caused by this proposal is greatly outweighed by the public economic, social and environmental benefits of ensuring that the established mobile network coverage is continued to the wider area.

Type of Structure *(e.g. tower, mast, etc):*	
Description: The installation of a 20m-high slimline monopole, supporting 12no. antenna apertures & 2no. 600mm transmission dishes, and wraparound cabinet; plus the installation of 6no. ground-based equipment cabinets; and ancillary development thereto.	
Overall Height:	20 Metres
Equipment Housing:	
Length:	2000mm
Width:	750mm
Height:	1850mm
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Steel – Grey (RAL 7035) (unless otherwise suggested by the Local Authority)
Equipment housing – type of material and external colour:	Steel – Grey (unless otherwise suggested by the Local Authority)

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

In designing this telecommunications installation, the applicant has sought to achieve a balance between the technical requirements of the Operators 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.

The application proposes to install a 20-metre-high telecommunications monopole with 'stacked' antennas and associated ground-based equipment cabinets. This proposed telecommunications site will replace the existing, rooftop installation at Credon House, approximately 250m south of the application site.

The proposed apparatus will provide continuous 2G, 3G and 4G coverage for two major mobile operators in this area, as well as brand new 5G network coverage. This will ensure that the surrounding area is not left without the established network coverage which has been provided since the apparatus at Credon House was deployed.

The choice of design at the application site is governed by two main factors; the context and visual amenity of the area; and, the technical requirements.

Technical Objective and Technical Requirements

The objective of this site is to ensure permanent coverage to the area is continued, and enhanced, and disruption to the wider network is not caused, when the base station at Credon House is removed. The long-term retention of network services is therefore of paramount importance and at risk until a permanent base station is integrated into the network.

When any telecommunications site is decommissioned, there is an obvious impact on the network. In order to pre-empt any loss of network coverage when the existing site is removed, a new site has been identified which offers the best technical solution and replicates coverage to the target area, provided by the existing installation. If the existing site is removed without a replacement site, there is a two-fold effect – the loss of coverage to the local area; and a greater disruption to the wider network. Each telecommunications site connects to another to create a network. If one network cell is removed, the connection to the adjacent network cells is lost, leading to impacts reaching far further than the immediate consumers.

The proposal has been sited and designed to provide continued coverage to the local area, replacing the existing installation, approximately 250 metres away. Should this proposal not proceed, the local area will be left with a large coverage hole once the existing site is removed. This proposal will fill the coverage hole and ensure that there is no down-time within the network, thereby addressing any wider implications for the network itself. The need for the proposed installation is henceforth established and justified. Additionally, the new installation will be 5G ready and therefore able to provide improved network coverage to the local area for two major mobile Operators.

By way of background information, in 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).

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

The antenna height is determined by a specialist network radio engineer using specialist software which factors in the area that coverage is required; the relationship between the selected site location and existing cell sites in the linked network; and variances in land levels and elements such as nearby trees or buildings, which can block or weaken signals.

6no. equipment cabinets are required to house the radio equipment and will be positioned in a neat arrangement at ground level. A wraparound cabinet will also be deployed around the monopole itself.

Visual Amenity

The applicant gives due regard in designing all new sites to limit the visual impact through good design. In this instance, the proposed installation is subject to technical and build constraints. That notwithstanding, it is submitted that the appropriate siting and design put forth will mitigate any potential impact on the site and its surroundings to an acceptable level.

To achieve the required replacement coverage and network improvement for both EE and H3G, a 20-metre-high slimline monopole is required. The proposed installation will also be 5G ready, with the structure capable of accommodating the necessary apparatus ‘within’ itself, thereby avoiding the need to deploy a structure with a wider headframe, or a traditional ‘bubble’ headframe. This innovative design is therefore the smallest and slimmest available to the Operators and has been selected to ensure that any perceived visual impact is reduced as far as practicable. The application site also ensures that the installation will be situated close enough to the target area it is designed to serve. This is a very important factor and must be acknowledged.

The impact on the Applicants networks can be seen in the accompanying coverage plots. These plots demonstrate that a significant coverage gap will be created within the wider area for 2G, 3G and 4G services and therefore a clear deficiency in Operator services for this community. As demonstrated in the coverage plots, the deployment of a base station at the application site will replace and enhance the current coverage scenario within the local area. 3G and 4G services will be enhanced, and new 5G coverage will be introduced into the area for the first time. Whilst the application site will provide a suitable technical solution for the local area, it is also considered that this location offers an appropriate town planning and environmental solution. The bulk and scale of the proposed equipment has been minimised as far as practicable, with the antennas ‘stacked’ within the structure itself. The apparatus has only **one** function – to provide network coverage to the local area. Its design, therefore, is solely dictated by operational functionality. The height of the antennas has been reduced to the lowest which would provide the required level of replacement coverage.

Dishes provide a link between base stations within the network. The size and height of the dishes is determined by the location of these surrounding neighbour cells. In this instance, 2no transmission dishes are required. The size and number of dishes has been kept to the minimum required for operational efficiency and the associated impact of this addition on the surroundings would be minimal.

As this site will be deployed with 5G capability, this application is not to simply address the imminent loss of coverage from the existing base station, but this scheme also proposes a vastly improved network and the provision of 5G technology; the next stage in technological advancement which is being rolled out across the country. In order to provide this next level of coverage, additional equipment and apparatus is required, all of which can be accommodated on the proposed structure and within the provided development.

Additionally, and as discussed within this statement, the proposed development will also provide the new Emergency Services Network (ESN) for the Ambulance, Fire and Rescue, and Police Services. This is an important planning consideration and should be acknowledged in any planning assessment.

Whilst the applicant accepts that there will be some level of visual impact, when this is compared to the numerous social and economic benefits which will be brought forward with the proposal, it is considered that the application should be deemed acceptable, and therefore receive Officer support.

The applicants encourage the Council to make a clear distinction between '*visibility*' and '*harm*', when assessing this proposal. At 20 metres in height, the structure will be visible. However, being able to see something does not immediately infer that it is either inappropriate or harmful. The applicants submit that, despite the proposed development being visible, it is not harmful, and that the height of the apparatus is solely dictated by its function. This must be acknowledged by the Council. It must also be acknowledged that the Council considered two other nearby telecommunications towers as acceptable, both of which were more robust, and more visible, than the proposed scheme at Ilderton Road. The lattice tower approved under application 03/AP/2019 was circa 50% taller than the proposed scheme and would only provide 2G and 3G services at the time of its approval. The scheme currently before the Council would provide significantly better coverage, connectivity and capacity for consumers on two of the major mobile networks, from an installation that is the smallest and thinnest available for deployment. The proposed design cannot be amended without compromising the technical efficiency of the installation and therefore ultimately the creation of localised 'coverage gaps' within the surrounding area.

Due consideration has been given to the process and the proposal put forward is the best available option – it both achieves the technical requirements and does not bring unacceptable harm to the character of the area.

It is anticipated that this installation will become an accepted part of the built environment over time – as is the case with the existing installation on the rooftop of Credon House, the 28.5m lattice tower on Ilderton Road, and the 20m monopole next to South Bermondsey Train Station. The mature tree cover within the surrounding streets will assist in filtering public views of the proposed structure, whilst the utilitarian context provided by the light-retail and commercial units on Ilderton Road, will ensure that the development is able to assimilate into the local area with ease.

Whilst it is accepted that the structure will be visible, it is considered that the economic, social and environmental benefits brought forward by retaining network coverage across the local area outweighs any harm that the proposal may cause.

It is considered, overall, that the design is appropriate to the site and surrounding area and avoids any unacceptable level of impact.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, EE Ltd and H3G UK Ltd 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 EE Ltd and H3G UK Ltd'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.	**Yes**	

4. Technical Justification

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

The proposed site is required as a replacement base station, rather than an additional base station, for the area. EE and H3G (known as the operator 'Three') have an existing radio base station located on the rooftop of Credon House (NGR: E534911, N178102), approximately 250m south of the application site. This existing installation is due to be decommissioned and removed to allow the landlord to redevelop the site. To ensure network coverage is continued, a new base station must be deployed which will satisfy the current technical needs of the network and ensure continued provision of mobile services within this area, as well as being 5G-ready at the stage of deployment.

The area that this particular network cell covers is substantial, as shown on the accompanying operator coverage plots. In order to ensure that the complete, existing, serviced area is covered, and no coverage gaps are created when the existing installation at Credon House is removed, a new base station is proposed at the application site.

Should this application not be supported by the Council, and no replacement cell integrated into the network prior to the removal of the existing installation, then this area will lose coverage for two major mobile Operators permanently, for the first time since the Credon House site was deployed.

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 (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.

As base stations are low-powered radio transmitters they each have a limited range, meaning that they generally need to be located close to (or within) the target area which requires coverage. If a base station is moved too far away from the target area, then it is likely that some sections of the target area will remain without the network services they previously enjoyed.

When an existing site is lost from the network, as is the case with this scenario, it will result in a very specific "coverage gap" and an alternative site needs to be identified to ensure that this gap is filled. The consequence of not filling this coverage gap is that users of the networks find that the services they previously had access to are either limited or removed. This is what the Operators are aiming to avoid in this instance, with the identification of a new location for a cell site to service this area.

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 recognises 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***" (emphasis added).

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

In March 2020, the decision of Birmingham City Council to refuse planning permission for the replacement of a 12.5-metre-high monopole with a 20-metre-high monopole was overturned by the Planning Inspectorate (EE Ltd and H3G UK Ltd Vs Birmingham City Council, appeal reference APP/P4605/W/19/3241791). Within the decision notice, the Inspector stated that:

"The proposed upgrade would contribute to delivering a modern, advanced, high quality and reliable communications infrastructure… ***It follows that the upgraded mast would support economic growth and the local community by enabling fast and reliable communication to take place, for example by helping people gain employment, access services, support their health and well-being, whilst also assisting new technologies*** (emphasis added).

In this case, ***the proposed development would result in harm to the visual amenity of the area, with particular regard to the proposal's scale and siting… However, I conclude that this harm would, on balance, be outweighed by the economic and social benefits*** *that would stem from the proposed upgrade which would not be realised whilst reducing the height of the mast"* (emphasis added).

In October 2020, the decision of Elmbridge Borough Council to refuse planning permission for the installation of a 15-metre-high monopole incorporating shrouded antenna and supporting 2no external dishes was overturned by the Planning Inspectorate (EE Ltd and H3G UK Ltd Vs Elmbridge Borough Council, appeal reference APP/K3605/W/19/3243927). Within the decision notice, the Inspector stated that:

"The mast would be taller and thicker than the existing nearby street lighting columns, road signs and overhead cable poles. Due to its height, the mast would be visible in local views from the public domain and from some residential properties in proximity….However, ***such masts are becoming more commonplace within the urban environment and so it would not appear as an alien or unexpected feature****" (our emphasis).*

In November 2020, the decision of Sheffield City Council to refuse planning permission for the upgrading of an 11.70m high telecommunications monopole to a 20m high monopole was overturned by the Planning Inspectorate (MBNL Vs Sheffield City Council, appeal reference APP/J4423/W/20/3256458). Within the decision notice, the Inspector stated:

"The existing mast is in a prominent position and there are numerous short and long-range opportunities to view the site".

"With the additional height the proposed mast would be a more prominent feature at the junction of Cottam Road and Foster Way and would also protrude above the surrounding built form, trees and street structures. As a result, ***the mast would be more apparent in its context than the existing mast and would, to some extent, detract from the character and appearance of the area because the location is an open area and its height would dominate the relatively low adjacent built form****"* (emphasis added)*.*

*"****The appellant confirms that the design of the proposal was directly influenced by the technical constraints of deploying a 5G site which are greater than those associated with previous generations of the technology*** *and that every aspect of the design has been kept to the minimum necessary for the technology to operate"* (emphasis added)*.*

The Inspector recognised the economic and social importance of advanced, high-quality and reliable telecommunications services, as well as the provision of the Emergency Services Network from the proposed installation, and whilst the appeal proposal would result in some limited harm to the area's character and appearance, they did conclude that:

*"****This harm would, on balance, be outweighed by the economic and social benefits*** *that would arise as a result of the proposed upgrade which would not be achieved with a mast of a lower height"* (emphasis added)*.*

The same conclusions can be drawn from these three recent appeal decisions and applied to the proposal before the Council. The importance of continued, and improved, telecommunications network coverage cannot be underestimated, especially throughout the years 2020 and 2021, when the dependence on these networks has been higher than ever before. There are now a plethora of appeal cases which have been considered appropriate by the Planning Inspectorate for installations very similar to the one proposed here. It is therefore clear that Council support should also be offered to this scheme

At the time of writing, our dependence on network services and connectivity is ever more apparent. Restrictions on travel resulting from the Coronavirus pandemic, combined with a third national lockdown, have resulted in a massive shift from office based to home working, from physical, professional and social gatherings to virtual ones, and to unprecedented reliance on online shopping and entertainment services. Usage within suburbs has increased dramatically as less people are travelling to town and city centres. Maintaining and enhancing the mobile networks is of vital national importance, and it is significant that telecoms has been designated as "critical work" during this time. It is anticipated that the current shift towards homeworking and online services will persist, to a lesser degree, in the future. It is vital that the infrastructure is in place throughout the UK to meet this demand.

The Ofcom Connected Nations 2020 UK Report outlines a sharp increase in both mobile and voice data, particularly during the enforced national lockdowns of 2020. The report states that average call volumes and average call duration increased in the week that national lockdown was introduced in March 2020, with mobile hotspots shifting away from city centres to the suburbs and residential areas as restrictions continued.

Significantly, the same report states that the consumption of mobile data saw a staggering rise of 42%, when compared with the previous year. Additionally, the traffic carried in England in June

2020 (during lockdown) exceeded that carried across the whole of the UK (England, Scotland, Wales, and Northern Ireland) in February 2020 (prior to lockdown).

In his speech at Connected Britain 2020 , in September 2020, Digital Infrastructure Minister, Matt Warman, stated the following:

"COVID has altered the way we live, work and, most importantly, stay connected with our family and friends. The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown - and is now more important than ever as we head into recovery. Many of these changes - such as increased working from home - will stay with us for the foreseeable future".

The implementation of a third national lockdown throughout January, February, March and April 2021 saw a return of most aspects of life associated with the two previous lockdowns, and the same increases in voice calls and mobile data consumption is expected. Mr Warman also stated the following:

"The world is in the middle of a digital revolution. COVID has accelerated this process, digitising almost every part of our everyday lives and making the infrastructure that connects us more important than ever. That's why it is at the top of the government's agenda".

Central Governments' direction of travel is to support the roll-out of 5G technology and this was the case pre-pandemic. Since its initial roll-out in 2019, Operators have continued to deploy 5G across the UK, largely via the upgrading of existing base stations. Around 3,000 base stations now carry 5G technology. Mr Warman also confirmed that legislative reforms were being undertaken to make it easier for Operators to deploy and upgrade telecommunications base stations.

Notwithstanding the Covid-19 pandemic, and the increase in network reliance, a look at past data shows that our reliance on mobile networks was increasing year-on-year, prior to 2020. 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 participants 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 nation's increasing dependency on mobile services and connectivity.

A recent YouGov survey (January 2021) adds further support to this, with 67% of those who are currently working from home and have been using mobile data agreeing that access to it will be an important factor when choosing where to live in the future. This rises to 76% for 18 to 34-year olds. The survey also confirmed that 44% of one network Operator's data traffic in January 2021 went to streaming services, such as Disney+, and that 45% of 18 to 24 year olds confirming that they are more likely to use their mobile data for browsing social media.

All of the above occur in a domestic setting. There is a clear need and demand for connectivity and capacity, and it is anticipated that telecommunications infrastructure has become, and will continue to become, commonplace in residential and suburban settings, and on highways verges, such as the application site.

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 imminent permanent loss of services on two major networks, at a time when reliance on connectivity services is a fundamental part of everyday life, is simply unacceptable.

As introduced above in Section 3 of this document, the objective of this site is to ensure network coverage to the area is continued, and disruption to the wider network is reduced, when the existing installation on the rooftop of Credon House is removed.

The installation of this proposal will enable 2G, 3G and 4G services. The installation will also be 5G-ready at the point of the deployment, greatly improving the level, and quality, of network coverage to the surrounding area.

2G was the second generation of mobile phone transmission, it introduced data services for mobile, starting with SMS text messages.

3G was an extension to this and enabled the use of data. The main technological difference that distinguishes it from 2G technology is the use of packet-switching rather than circuit-switching for data transmission. Increased data rate to a minimum of 2 Mbit/s for stationary or walking users, and 384 Kbit/s in a moving vehicle.

Similarly, 4G was another extension and enabled an increased speed in connection. It supports a minimum data rate of 1 Gbit/s for stationary and 100 Mbit/s for mobile operation. In simple terms, the benefit to users is that 4G supports mixed data, voice, video and messaging traffic at significantly faster speeds than 3G. This results in ultra-fast internet browsing, video streaming, gaming, e-mail and downloads.

5G is the next level of mobile technology which is currently being rolled-out across the UK. Further details of the 5G network can be found within the accompanying document *'5G and Future Technology'*.

At a local level, this replacement installation continues to allow for an increase in home working, by providing the opportunity to create a "virtual office", reducing the need to travel for work as a consequence.

It is therefore very important for 'mobile only' households that live and work and any businesses that operate in this part of the LPA's area, together with visitors and others who are staying in or travelling through the area, that the necessary indoor RF coverage is provided to enable them to have satisfactory mobile telephone and internet access.

On a wider scale, the proposal would continue to contribute towards the country's connectivity and digital economy future. Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion, and, on a local scale, it is important to ensure the continuation of established telecommunications networks in this area.

Ofcom's 2018 Communications Market Research Report shows that smartphones are owned by four of every five UK consumers and smart TVs are in almost half of all households. 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, sufficient coverage is obviously vital for this basic utilities service to be provided.

The UK Government, recognising the benefits to commerce, industry and the public in general, places great emphasis on the benefits of mobile telecommunications to modern life. This position was reinforced by a statement made by then Prime Minister David Cameron in March 2016 when he specifically addressed the vital importance of mobile connectivity for residents and local economies and highlighted that the urgent delivery of the required network improvements is a Government priority;

"*Ten years ago, we were all rather guilty of leading campaigns against masts and all the rest of it. Our constituents now want internet and mobile phone coverage. We need to make sure that we change the law in all the ways necessary, that the wayleaves are granted, that the masts are built, that we increase coverage and that everyone is connected to the information superhighway. This is substantiated in the most recent budget announcement of 16th March 2016, which commits to provisions for "greater freedoms and flexibilities for the deployment of mobile infrastructure".*

Since 2016, and particularly during the enforced lockdowns of 2020 and 2021, public and business reliance on the established mobile networks has continued to increase. Improved mobile coverage and connectivity is now no longer viewed as a 'luxury', but rather an every-day necessity. This has been further exacerbated as, at the time of writing, the country is now in a third national lockdown in the space of 15 months. It is imperative that connectivity and capacity is continuous – to allow home-working, home-schooling, online grocery shopping, and video-calling friends and family that we cannot physically visit. Our reliance on these established networks is at an unprecedented level and it must therefore be ensured that coverage is not only continued, but also improved – i.e. with the provision of brand-new 5G technology.

5. Site Selection Process

Alternative sites considered and not chosen

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
RT	1 Varcoe Road, London, SE16 3DG.	E534915 , N178053	A rooftop option was investigated at this building. However, the landlord's intention to install a large-scale solar panel scheme on the rooftop, similar to the adjacent building, would hinder access to the rooftop and prove problematic in achieving a desirable rooftop design. Additionally, there is an outstanding planning application relating to Credon House, which is currently being assessed by the Local Authority (REF: 19/AP/7550). Should this development be granted by the Local Authority, a 10-storey building would obstruct any network signals provided from a base station at 1 Varcoe Road. As such, this option was discounted.
RT	Batwa House, Varcoe Road, London, SE16 3BF.	E534979, N178073	An option was investigated on the rooftop of Batwa House. However, as the rooftop is pitched, the necessary apparatus cannot be deployed here. This option was therefore discounted.
RT	6 Varcoe Road, London, SE16 3DG.	E534942 , N178037	An option was investigated at this location. This building, however, has a curved roof and cannot accommodate the necessary apparatus. Consequently, this option was discounted.
RT	Crown Place Apartments, 20 Varcoe Road, London, SE16 3AD.	E534973, N178039	An option was investigated on the rooftop of the Crown Place Apartments. This five-storey building was assessed by the Radio Planning Team and it was confirmed that the 'coverage gap' could be better addressed via the proposed development at the application site on Ilderton Road, rather than the Crown Place Apartments. Additionally, if the planning application for the development of Credon House is approved, the 10-storey building that will be constructed at that location will lead to significant signal attenuation to

			the north, which, in turn, will create a ‘coverage gap’. This option was therefore discounted.
RT	The Bramcote Arms, 58 Bramcote Grove, London, SE16 3BW.	E535020, N178179	An option was investigated on the rooftop of The Bramcote Arms. However, as the rooftop is pitched, the necessary apparatus cannot be deployed here. This option was therefore discounted.
GF	Bramcote Park, Bramcote Grove, London, SE16 3BT	E535043, N178091	An option was investigated at this location, within Bramcote Park itself. However, due to the nature of dense residential properties in the immediate vicinity, a number of which directly overlook the park, it was considered that the application site on Ilderton Road offers a better environmental and town planning solution. As such, this option was discounted.
GF	Land at Ilderton Road, London, SE16 3BQ.	E535198, N178207	An option was investigated at this location. However, there is an outstanding planning application for this land for the development of 312 new residential units (Ref: 18/AP/2497). As such, this option was discounted as no viable solution can be brought forward at this time.
GF	141 Verney Road, London, SE16 3AY.	E535199, N178088	The installation of a new ground-based mast was investigated at this location. However, the Radio Planning Team confirmed that a new mast here would not provide the same level of replacement coverage as one at the application site. Additionally, due to a lack of tree cover in the immediate area, this option was also considered to be a poorer environmental and town planning solution when compared directly to the proposed scheme at Ilderton Road. This option was therefore discounted.

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

Given the nature of the site search – i.e. a very specific existing cell site on the rooftop of the Credon House building – there is a very restricted geographical area in which this base station can be deployed, to ensure that the existing coverage footprint is replicated. The surrounding area is undergoing relatively large-scale redevelopment, with a number of applications currently before the Council for the creation of residential properties. As such, the search area is further restricted and opportunities to deploy the required base station are limited within the local area.

As with any network planning, it is important to strategically position network cells sufficiently apart so that their coverage plots do not overlap (to any significant extent) and that the maximum coverage can be achieved from each separate base station. The established coverage footprint is evident within the accompanying coverage plots, with any replacement installation needing to be deployed in close proximity to the area it is designed to service. It is clear that the options within the local area are limited, as a number of areas of land have been developed in recent years, and this continues to be the case. As such, there are few alternative options, none which would be considered preferable to the proposed development, in terms of achievable network coverage.

It is considered that the application site offers an appropriate environmental and town planning solution, whilst simultaneously ensuring the operational parameters of the installation are met. It is considered that there is no better option within the refined search area, hence the application which sits before the Council. It is considered that the proposal is appropriate to the surroundings and that there is no better alternative location available which will provide the necessary coverage to the local area.

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

Environmental Information:
There is no evidence of protected species at this location, with the surrounding area consisting of largescale development and buildings. The proposal will subsequently not have any potential negative impacts on any sensitive habitats or species.

As far as practicable the proposed development has been designed to keep to a minimum the impact on amenity and the design of the development ensures there would be only a limited impact which would not be sufficient to harm visual or residential amenity.

Siting and Appearance:
It is considered that the proposal utilises the most suitable design available to meet the technical requirement within the very specific technical constraints. As discussed in Section 3 of this document, this site is required to replace the existing coverage that will be lost when the rooftop installation at Credon House, which currently services this area, is removed. The proposed development before the Council has been specifically designed for use in urban areas and is the smallest and slimmest available to network Operators. It is considered that the use of a slimline monopole will reduce any perceived visual impact associated with the development (to the maximum extent) and restrict the visibility of the proposed structure within the local area. This will be assisted by the presence of mature trees which line Ilderton Road and Rotherhithe New Road, thereby filtering the views of the public and road-users.

The proposed installation will also have 5G capability at the time of deployment, and hence the structure must be taller to accommodate the necessary equipment to provide this brand-new level of mobile coverage to the local area. Innovative design has allowed the proposed antennas to be 'stacked' within the monopole, and not add to the width of the installation – in the form of a large headframe – instead increasing the height and maintaining a linear structure with no shrouded element. The technical requirements of this site can be met by installing a slimline monopole, rather than a more robust lattice tower, or even a monopole with a shrouded headframe, to ensure that the established operator network coverage is reinstated and improved upon.

The retail and commercial context of the immediate area, married with the industrial context of the wider area – particularly to the east and north, as stated in the Officers Delegated Report for application 03/AP/2019 – will allow the proposed installation to assimilate into the local streetscene with ease. Given that two other, larger and more robust telecommunications sites have been present on the local skyline, and within 200m of the application site, for the last 20 years, it is not anticipated that the proposed structure will form an incongruous feature within the local area, but rather one whose presence is accepted because it serves a very specific and very important function.

Whilst this application is being brought forward as a 'replacement' cell to the one which is being decommissioned, the fact that it will be 5G-ready at the point of deployment is a significant point of note. This application is therefore not only a 'replacement' of the existing coverage, but will also lead to significant connectivity improvements with the availability of 5G coverage, as well as improved 2G, 3G and 4G network capacity for both EE and H3G (Three) within the local area.

The application site is not located within a designated area, and it is considered that the proposal will not bring about substantial harm to the character of the area but will bring benefit to the public through retained and improved connectivity and communications services.

While the applicants do not suggest that the proposal will have no impact, it is considered that when applying the balancing method advocated in the NPPF, the proposal finds itself in favour. It is important to keep the impact of telecommunications development in the area to a minimum and it is considered that the proposed development achieves this. When considering the benefits of the proposal, the public benefit from retained and improved connectivity and wireless communication services is a significant one. The applicant considers that any perceived visual impact on the area, or skyline, has been mitigated, as far as practicable, through the best design available within the technical constraints of the site, and that this development will provide excellent public benefits – both in the present, and in the future.

In this case, it is suggested that the application of the balancing method advocated in the NPPF, for the provision of communications and connectivity services, in the public interest, be utilised to balance the need for continued connectivity with the potential impact of the site. It is considered that when this balance test is applied to the proposal, where the need and significant public benefit is balanced against the appearance and level of associated visual impact of the proposed site, that the application proposal is positively in favour and is considered wholly appropriate.

This has been emphasised by the Planning Inspectorate on a number of appeal cases where, the Planning Inspectorate has ruled in favour of proposed developments of a similar nature, where this balance was applied. Some recent examples of where this balance was applied

by the Planning Inspectorate include appeal cases referenced APP/Q3305/W/18/3206555 and APP/L1765/W/18/3197522. Extracts from these appeal decisions are included below for your convenience:

"*In considering the need for the proposal, Government policy, as set out in the Framework states that advanced,* ***high-quality and reliable communications infrastructure is essential for economic growth and social well-being. In this respect, I have found that there is a need for the proposal which therefore weighs strongly in its favour****. As I have found that the level of harm relating to this second main issue would be low, that identified need would outweigh the harm in this case"* (emphasis added).

"*I conclude on this issue that despite the less than substantial harm that would be caused, the* ***public benefits of the proposal would outweigh that harm****"* (emphasis added).

"*9. The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "Advanced, high-quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections… The Council has commented that service provision would be 'adequate' without the proposal, but* ***the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision***" (emphasis added).

"*13. Having regard to all relevant considerations, including national planning policy and the potential availability of alternative sites, 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"* (emphasis added).

Whilst each application needs to be assessed on its own merits, the above appeals (along with a growing number of others, many of which are referenced in the preceding sections of this document) indicate a growing trend, based on national policy and guidance, to favour important utilities and infrastructure developments in the wider public interest when the potential harm is outweighed by the important and unavoidable public benefits they provide. Ensuring continued network coverage to the local area, for two major mobile Operators, is considered a major public benefit.

The selected siting is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding harm to the local streetscene and the surrounding area. The application site has been strategically positioned away from residential housing, as far as practicable, and will be set amongst mature trees on a wide pedestrian footway on Ilderton Road. Additionally, existing vertically engineered structures in the form of street lighting columns, traffic light columns and road signs are situated in close proximity at the junction of Rotherhithe New Road and Ilderton Road, and run parallel to Ilderton Road. The presence of these engineered features will ensure that the proposed development will assimilate into the wider streetscene with ease.

The selection of a slimline monopole, rather than a lattice tower or a traditional shrouded monopole, has been brought forward to ensure that the size and scaling of the proposed installation is reduced as far as practicable. The proposed design is far slimmer than the

traditional lattice towers that are regularly rolled-out at industrial application sites – much like the 17.9m lattice tower that was in situ approximately 200m east of the application, which was then upgraded to a 28.5m lattice tower, and also shrouded monopoles that are often deployed within urban environments.

The antennas cannot be screened for operational reasons as this would result in an attenuation of the signal and reduced network coverage. However, strategically positioning the proposed installation a reasonable distance from residential properties, is considered that the least-impacting site has been brought forward as part of this application.

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 continued and enhanced services to the area in the public interest. Given the social, economic and environmental benefits that will be brought forward as part of this proposal, in achieving continuous network coverage for the area, it is not considered that the perceived visual impact of this proposal would outweigh said benefits, and that Officer support should therefore be given As such, equilibrium will be achieved between technical requirements and environmental impact.

Planning 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 ensure the continued provision of reliable mobile communications services to the local area, 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".* Whilst a new site is proposed within this application, it would replace one being lost from the network. As such, there would be no increase in telecommunications sites within the Local Authority area, but rather a one-for-one swap.

Given that there appears to be no timeline as to when things may return to 'normal', in regard to the current global coronavirus pandemic, ensuring that existing network coverage is available to all communities is of paramount importance to the Operators and Central Government. The proposed development at the application site, will ensure continuous 2G, 3G and 4G network coverage, plus brand-new 5G coverage across the wider area.

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.

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 by 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***" (emphasis added).

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***" (emphasis added).

In both cases cited, the developments were new base station installations proposed within Conservation Areas 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 application, the same public benefit occurs, plus the deployment of apparatus with 5G capability, without the harm to any nearby designated areas.

Local Guidance:

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

For the purposes of Section 70, the current adopted development plan for Southwark Council, relevant to the proposal, comprises:

- The London Plan 2021;
- Southwark Council Core Strategy (adopted April 2011);
- Saved Southwark Plan policies (April 2013).

The London Plan 2021

A new London Plan was adopted in March 2021. In a similar fashion to the previous London Plan (2016), the new 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 'Policy SI 6: Digital Connectivity Infrastructure' the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to ensure its global competitiveness, now and in the future.

It is considered that the Operators' networks are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. The written justification for Policy SI 6 states the following:

*"The **provision of digital infrastructure** is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance. London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. **Fast, reliable digital connectivity is essential in today's economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration.***

***Access for network operators to rooftops of new developments should be supported where an improvement to the mobile connectivity of the area can be identified** (emphasis added).*

Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their Development Plans".

Policy SI 6, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing EE and H3G to provide continued and significantly enhanced coverage to the surrounding area. The proposed development meets the aims of the London Plan (2021) and the long-term strategies which the Mayor aims to achieve through this guidance.

London Infrastructure Delivery Plan 2050 (published 2014):

As part of the work on the 2015 London Plan Alterations, the Mayor commissioned work to develop a long-term infrastructure investment plan for London, and in 2014 the 'London Infrastructure Delivery Plan 2050' was published. The stated aim of the Infrastructure Delivery Plan is to provide for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 of the Plan, Digital Connectivity, indicates how the Mayor's Office will support a mix of technologies including mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term, as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. Deployment of the proposed base station will contribute to London's agenda for reliable high-speed communications as it has been designed to incorporate emerging and future technologies. Among other matters the Delivery Plan stated:

"Broadband is now considered the fourth utility. The Government has stated that it wants 99% of the population to have superfast connections by 2018. Internet access speeds and coverage affect the productivity of businesses and are now a factor considered by homebuyers. Access is not only essential to many businesses, but also, as more local authorities are encouraged to move the services they provide online, access is essential for residents to be able to take part in a modern society. The Mayor wants every resident and business in London to be able to have affordable high-speed internet connectivity, should they choose to access it".

This proposal seeks, individually, to provide high speed internet connectivity throughout London.

Southwark Council Development Plan:

The Southwark Council Core Strategy (adopted April 2011) does not contain a specific Telecommunications policy.

Saved Policy 3.24 of the Southwark Plan (2007) is the only relevant Telecommunications policy within the Council's development plan documents. It states that *"telecommunications networks make an important contribution to business, commercial and home life, and have benefits for safety and security*", thereby acknowledging the importance of these sites to the modern world.

However, given that this policy references superseded policies (namely Part 24, which is now Part 16), and does not acknowledge the revised GPDO Prior Approval process, then greater weight should be given to the National Planning Policy Framework, which is wholly supportive of improving telecommunications infrastructure across the country. As this proposal will result in a direct improvement to telecommunications provision within this area, it wholly accords with national planning policy.

Southwark Council currently has an emerging Local Plan out for consultation. However, as this document is yet to be adopted, there is unlikely to be any weight given to the policies contained within it. As such, it is expected that this proposal will be assessed against the current Local Plan (2001) and Saved Policies from the 2007 Plan, as outlined above.

There is a need for both Operators to retain and improve network services, including providing new 5G coverage. The proposal involves the deployment of a new telecommunications base station, which will replace an existing one (250m away), and allow sharing for two Operators and for multiple technologies. This therefore assists in keeping the overall number of

installations to a minimum, as this installation will replace the existing base station on the rooftop of Credon House – resulting in no net gain of telecommunications sites within the local area.

The application site is considered the most appropriate available, within a very specific search area. Whilst the proposed development is taller than the 'traditional' telecommunications monopole, this is due to the additional equipment which will lead to the provision of 5G network coverage. As the 5G network roll-out is in its infancy, and as more sites are deployed, 20-metre high installations will soon replace existing 15 metre sites across the country – thereby becoming 'the new normal'. This is supported by the Government's relaxation of Permitted Development rights in 2017, which show a clear indication that 20m is now the accepted height for new base stations situated on highways land and immediately adjacent to the public highway.

This design is considered wholly appropriate for urban areas, especially those situated in close proximity to major public highways, and slimline monopoles are now regularly rolled-out in both urban and non-urban areas. The proposed installation will be shared by two major mobile Operators, a point which is supported in both Local and National Planning Policy. As outlined in the Alternative Site Assessment, in Section 5 of this document, the application site is considered to be the best solution from both a technical perspective, as well as a town planning and environmental perspective. It is therefore considered that, in the absence of a local telecommunications policy, the proposed development is in complete accordance with national planning policy and should therefore receive Officer support.

As this installation will allow two Operators to occupy the site, and provide continued and improved network coverage (in the form of 5G), this proposal aligns with the national planning policy of mast sharing, where possible. The proposed design has been kept to the smallest possible in terms of scale – height and width – with a slimline monopole proposed, ensuring that the perceived visual impact is reduced as far as practicable.

As outlined in this application, the proposed apparatus will be shared by two mobile network operators, and, in due course, the Emergency Services Network (ESN), which will be provided through EE's infrastructure. As such, this multi-user site will assist in keeping the number of ground-based masts in the area to a minimum, assisting in reducing mast proliferation within the Local Authority's jurisdiction.

It has been demonstrated that the proposed scheme utilises good design. Whilst the apparatus may not be considered attractive, it is of 'high quality' design. As detailed at length within this application, the apparatus is dictated solely by function. The apparatus is required to provide network coverage to a specific target area. It has no other function and this must be acknowledged by the Council.

No conflict has been identified with any other Development Plan policies.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy, it minimises the number of installations by sharing and would provide coverage for a wide range of technologies. It is of significance that the development ensures a continued and enhanced provision of local community facilities and services through the integration of a replacement base station into the Operators network. Should this application <u>not</u> be supported by the Council, and the existing base station on Credon House is decommissioned and removed, then this area will face significant disruption to the permanent provision of network coverage for EE and H3G.

As outlined within this document, the applicants consider that any perceived harm to the local area has been minimised as far as practicable, and, when balanced against the public benefits that will be brought forward by continuous and improved mobile coverage for two major network Operators, the proposed development is considered wholly appropriate.

Conclusion

In summary, the application is in respect of electronic communications apparatus necessary to retain and improve existing public infrastructure networks, prior to the removal of the existing, nearby, installation. If no permanent solution can be integrated into the network then this area will find itself in a 'coverage gap' for the first time since network roll-out almost 20 years ago. The proposed development will ensure that this does not happen.

This statement has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact, being appropriately designed and located, as far as practicable.

The existing rooftop base station provides 2G, 3G and 4G coverage for two Operators. The proposed apparatus will improve the level of 3G and 4G coverage provided to the local area, as well as providing brand-new 5G connectivity for the first time. This proposed development will also provide the Emergency Services Network (ESN) coverage for the Ambulance, Fire and Rescue, and Police Services. This is an important planning consideration and must be acknowledged by the Local Authority.

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

Name: (Agent)	Nick Allan	Telephone:	01932 411 011
Operator:	EE Ltd and H3G UK Ltd		
Address:	C/o Agent	Email Address:	Nick.allan@waldontelecom.com
		Date:	4/6/2021
Signed:	*N. Allan*	Company:	Waldon Telecom
Position:	Town Planner	(on behalf of MBNL (EE Ltd and H3G UK Ltd) and above operator)	Waldon Telecom (Agent) Phoenix House Pyrford Road West Byfleet Surrey KT14 6RA