

Date: 9th September 2021



Our Ref: 13745/Kingsley Court/RYS

Chief Planning Officer
London Borough of Brent
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

Submitted via Planning Portal

Dear Sir or Madam,

FULL APPLICATION AND LISTED BUILDING CONSENT FOR TELECOMMUNICATIONS UPGRADE AT KINGSLEY COURT, ST PAULS AVENUE, WILLESDEN GREEN, CRICKLEWOOD, LONDON, NW2 5TH

[NGR: E 522941 / N 184923, SITE ID: 13745/BRT095]

Avison Young are planning consultants acting on behalf of Mobile Broadband Network Limited (MBNL), which is a joint venture co-owned by EE Limited and H3G UK Limited, to submit the application contained herein for the upgrade of an existing telecommunications base station as proposed below.

Description of Development:

Removal of 3no. existing antennas to be replaced with 6no. antennas, the relocation of 4 no. existing cabinets, the removal of 1 no. cabinet and the installation of 4 no. cabinets (8 in total) and 1no. ground based electrical meter cabinet with associated ancillary works thereto.

Enclosed you will find an application prepared on behalf of EE Limited and H3G UK Limited who are licensed operators that provide Cellular Network based upon the Global System for Mobile (GSM) standard and Universal Mobile Telecommunications System (UMTS) within the United Kingdom.

The supporting documents submitted with this application are as follows:

- Application Form (as generated through Planning Portal)
- Drawings 13745_KINGSLEY COURT_002,100,150A,150B,150C,150D,215,265A,265B,265C,265D 305,519 issue G3.
- Planning Statement (Design and Access Statement)
- ICNIRP Certificate
- 5G and Future Technology
- Connected Growth Manual – Digital Infrastructure
- IET Guide to 5G

No fee is required for the submission as it is a resubmission with 12 months of an application being withdrawn.

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

Yours faithfully

A handwritten signature in black ink that reads "R. M. Skerrett". The signature is written in a cursive style with a large, stylized 'R' and 'S'.

Rebecca Skerrett
Associate Director
Telecoms

Rebecca.skerrett@avisonyoung.com

D +44(0)161 956 4305
M +44(0)7876391678

Avison Young
For and on behalf of Mobile Broadband Network Limited

DESIGN AND ACCESS STATEMENT

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

1. HISTORY & BACKGROUND

Everything Everywhere Limited is a 50-50 joint venture between Deutsche Telekom and France Télécom and was formed in 2010 through the merger of their respective T-Mobile (UK) and Orange U.K. businesses.

On 3 September 2010, Everything Everywhere announced that Orange would join Mobile Broadband Network Ltd (MBNL), the joint venture management company formed in December 2007 between T-Mobile UK Ltd and Hutchison 3G UK Ltd (H3G UK).

In 2016, Everything Everywhere was chosen to work in conjunction with the Home Office to deliver the Emergency Services Network (ESN), which will deliver a smarter, better and cheaper communications capability.

The proposed upgrade subject to this application is part of the operators' continuous efforts to improve the existing 3G and 4G network across the country, in addition to introducing 5G technology to cater for current and future customer demands. It is evident that mobile phone usage has grown exponentially over recent years as more than 90% of the population now own a mobile phone. Customers expect to be able to use their mobile phones and tablets in all locations as these devices have become intrinsic to our personal and professional lives. UK operators are continuously trying to improve their network infrastructure in order to adapt to the changing environment and keep up with customer demands. With constant advancements in radio technology, it is therefore a natural consequence for base stations to be upgraded to accommodate newer versions of radio equipment.

As part of EE and H3G's ongoing network programme, there is a requirement for infrastructure improvements in this area of Brent and the surrounding local community. The proposed upgrade works will allow for better coverage and increased capacity to satisfy the traffic demands set by mobile users passing through this region, and will also help towards futureproofing the network to reduce the frequency of works required at the site.

Site History

The original planning permission for telecommunications equipment on Kingsley Court was granted in 1992 (reference 92/0735), with the building subsequently becoming statutory listed (Grade II) in 2000.

Subsequent telecommunications applications have been submitted, some of which have been approved and others which have been refused and dismissed or allowed at appeal.

- **95/0586** – Part 24 of the GDO – Installation of telecommunications equipment. **Raise no objection 25/05/1995**
- **97/1991** – Installation of equipment housing – cabinet on roof – Part 24 GPDO. **Raise no objection 21/10/1997**
- **05/2060 LBC** – Listed Building Consent for proposed installation of three telecommunications antennas, three equipment cabinets and ancillary development to rooftop of Kingsley Court. – **Appeal Dismissed 12/04/2006**
- **05/2059** – Installation of three telecommunications antennas, three equipment cabinets and ancillary development to rooftop of Kingsley Court. – **Appeal Dismissed 12/04/2006**

- **12/2459 LBC** – Listed building consent sought for installation of six replacement antennas, a proposed 600mm dish and installation of three equipment cabinets to replace the existing two cabinets on the roof of existing six storey residential building at Kingsley Court. – **Refused 07/11/2012**
- **13/0422** – Installation of six replacement antennas, a proposed 600mm dish and installation of three equipment cabinets to replace the existing two cabinets on the roof of existing six storey residential building at Kingsley Court. – **Allowed at appeal 14/04/2014**
- **13/1299/LBC** – Application for Listed Building Consent for development to replace 6No. antennas on existing supports, add 1No. 600mm dish on an existing support pole, remove 2No. equipment cabinets and install 3No. equipment cabinets on the existing steel grillage and ancillary development, to include a cable tray to be placed on the roof. – **Allowed at appeal 14/04/2014**
- **18/0416/LBC** – Application for Listed Building Consent for upgrade of existing telecommunications equipment at roof level to allow for 4G coverage, including replacement of 3No. existing antennas for 3No. upgraded antennas on existing support poles, replacement of 2No. existing equipment cabinets for 2No. upgraded equipment cabinets, and ancillary works. **Granted 29/03/2018**
- **19/2161/LBC and 19/2160 FULL** – Application for Listed Building Consent and Full Planning Consent for the removal and replacement of 3No. existing antennas with 6No. upgraded antennas on the rooftop, located on steelwork clad within GRP to match the existing brickwork, the removal and replacement of 4No. existing equipment cabinets with 8No. upgraded equipment cabinets located on the existing steel support grillage on the rooftop, and ancillary development thereto. **Refused 23/08/2020. On the following grounds: “ The proposed additional upgraded antennas and upgraded equipment cabinets, by reason of their design, size and siting, combined with their cumulative appearance would appear overly prominent, out of place and detrimental to the character and appearance of the Grade II Listed building and surrounding area. As such, the proposal is contrary to planning policies DMP1 and DMP7 of Brent’s Development Management Policies 2016.**
- **20/3124** – Removal of 3 No. existing antennas and equipment cabinets to be replaced with 6 No. antennas and 8 No. equipment cabinets on the roof and Installation of 1 No. ground based electrical meter cabinet with associated ancillary works thereto. This application was withdrawn after discussions with the planning officer.

A site meeting was held on 13th May 2021, where the proposal was discussed with Mark Price from the conservation team.

This revised scheme was drawn up which reflects the comments made on site. This amended scheme will tidy up the rooftop, there are a number of poles which will be removed as part of this application. All cables have been kept to the rear of the building and the meter cabinet has also been relocated to the rear of the site to reduce visual impact on the principal elevations. The antennas have been kept to the minimum height to ensure coverage and ICNIRP compliance and the amount of steelwork has been kept to the minimum. There have been some alterations to the cabinets on the roof to move them as far as possible from view of residents and the larger cabinets are positioned behind the chimney.

Site Selection

The applicant has adopted a sequential approach to site selection which is encouraged in the Code of Best Practice for Mobile Operators and the NPPF. Efforts have been made to utilise existing telecommunications sites wherever possible to prevent the proliferation of base stations. In this instance there was a suitable existing base station in the search area that could be upgraded to

accommodate the required technologies for the operator's needs. As a result, it was not required to identify alternative site options.

2. CONSULTATION

Pre-application consultation letters were issued on 11th September 2020 to the Local Planning Authority as well as local Ward Councillors, the local MP and St Mary Magdalen's Roman Catholic Junior School and Bambino Day Care.

No responses were received on the original scheme and due to the works being broadly similar and being for the same amount of equipment no further consultation has been undertaken apart from with the LPA. There will be an opportunity for local residents to comment during the determination of the application.

3. DESIGN

3.1 THE PROPOSAL

The application site is located at Kingsley Court, St Paul's Avenue, Willesden Green, Cricklewood, London, NW2 5 TH. The host building is a 6 storey residential block, which also has a secondary frontage on Park Avenue. The area is primarily residential in character, with neighbouring dwellings predominantly two/three storey terraces. To the north of the site is a railway line.

The host building is an existing base station which is an established feature of this streetscape that serves as an important cell within the wider mobile network due to the high density of users in this urban environment.

The description of the proposed development is the removal of 3no. existing antennas to be replaced with 6no. antennas, the relocation of 4 no. existing cabinets, the removal of 1 no. cabinet and the installation of 4 no. cabinets (8 in total) and 1no. ground based electrical meter cabinet with associated ancillary works thereto.

An application for Full Planning permission and Listed Building Consent is therefore submitted herein.

Heritage Statement

The site is Grade II listed, Historic England has the following information.

Heritage Category:

Listed Building

Grade:

II

List Entry Number:

1247239

Date first listed:

24-Nov-2000

This block of flats was designed in 1933-4 by Peter Caspari for Davis Estates. It features alternate, painted, banded render, between brickwork and glazed elevations. This is one of the first blocks of flats in an expressionist style in England, and the first work here by Peter Caspari, a former assistant of Erich Mendelsohn. The banded horizontals and use of curves is more sophisticated than that by any comparable British architect and shows the influence of Mendelsohn. This is the most eloquent of Caspari's blocks of flats, and one of his few English works; after the Second World War he immigrated to Canada.

Site Photo



Above is the site when viewed from St Pauls Avenue.



Above is the site when viewed from the junction of St Pauls Avenue and Park Avenue.



Site when viewed from Griffin Close.

Type of Structure (e.g. tower, mast, etc)	Pole mounted on rooftop
Overall Height	23.10 metres AGL to the top of the antennas
Height of Existing Building (if applicable)	19.7 metres to the top of the plantroom, 17.3 metres to the lower roof level.

Equipment Housing

Equipment Schedule									
Equipment ID	Quantity	Status	Equipment Description / Type	Equipment Manufacturer	Dimensions (W x D x H)	Weight (kg)	Colour (RAL Colour)	Material	Location
CAB1	1	Relocate	Emerson PSU	-	600x450x1600	-	Grey	Steel	Outdoor
CAB2	1	Relocate	Tx rack	-	600x500x2200	-	Grey	Steel	Outdoor
CAB3	1	Relocate	SAMO	SAMSUNG	600x550x1975	-	Grey	Steel	Outdoor
CAB4	1	Relocate	FURO cabinet	-	750x600x2100	-	Grey	Steel	Outdoor
CAB5	1	Remove	AMP30	-	-	-	Grey	Steel	Outdoor
CAB6	1	Proposed	H3G	-	770x770x2000	-	Grey	Steel	Outdoor
CAB7	1	Proposed	EE	-	770x770x2000	-	Grey	Steel	Outdoor
CAB8	1	Proposed	MKS Link AC	-	-	-	Grey	Steel	Outdoor
CAB9	1	Proposed	Meter Cabinet	-	-	-	Grey	Steel	Ground
CAB9	1	Proposed	Shared Cabinet	-	770x770x2000	-	Grey	Steel	Ground

Materials (as applicable)	
Tower/mast etc – type of material and external colour	Galvanised Steel – manufactured grey RAL 7035
Equipment housing – type of material and external colour	Galvanised Steel – manufactured grey RAL 7035
Frequency	GSM 1865.5-1846.5 MHz
Modulation Characteristics ¹	GMSK & UMTS
Power Output (expressed in EIRP in dBW per carrier)	56 dBm
Height of Antenna (m above ground level)	23.10 to top of the antennas.

3.2 DESIGN CONSIDERATIONS - SITING AND APPEARANCE

The applicant has sought to cause as little impact on the visual amenity of the area as possible whilst also ensuring that sufficient coverage requirements are achieved. A further explanation of the application's technical justification is explained in a later section of this statement however, it should be acknowledged from the start that the proposed 6no. antennas is technically necessary in order to create the power and capacity that the 5G frequency demands. Moreover, the proposed height of the antennas is required to ensure correct signal conveyance whereby a reduction in height may impact on the site's functionality. The operator's general practice

¹ The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase Modulation. The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation.

will always endeavour to propose the minimum height and least amount of equipment necessary to sufficiently achieve the desired coverage levels and it should be recognised that any reduction in height or equipment would compromise the site's effectiveness within the network. In this instance the equipment will be kept in one location and will reduce the about of equipment locations on the rooftop. Any additional equipment will be removed as a result of this application.

Though it is recognised that changes to a telecommunications site will to a degree be recognisable in any given environment, the acceptability of this proposal should be determined on whether any detrimental harm is demonstrable when balanced against the public benefits to be provided. It should first be acknowledged that the site is an existing base station which is an established feature of this street scene where telecommunications equipment is commonly found. The site was deemed acceptable by the local planning authority in its inception and sets precedence for telecommunications equipment at this location.

To minimise the change in visual appearance and to address the previous reason for refusal the equipment has been contained on the plant room and uses the existing equipment as much as possible. 8No. cabinets are proposed in total (4 No. existing to be relocated and 4 No. existing to be removed) on the roof top on the existing steel grillage. The equipment cabinets are positioned behind the chimney with the taller cabinets being directly located behind the chimney to reduce their presence and are located as far away from windows as possible, as discussed on site. The location of the electrical meter cabinet has been changed to the rear of the building so that it does not have a detrimental visual impact on the principal elevation of the building. It is not considered that the works are dissimilar to the existing. There will be no detrimental impact on the listed building as there will not be any alteration to the fabric of the listed building.

In this instance new support structures were required to accommodate the new technologies but in line with the previous reason for refusal these have been maintained on the plantroom as per the existing. This design layout strikes a balance between the site's technical requirements and visual amenity aspects and takes into consideration the previous reason for refusal. It is considered that this scheme reduces the amount of roof top clutter and the height increase is minimal when viewed from ground level. The applicant considers this change to be barely noticeable to residents and visitors in the local community when taking into account the existing layout at present which is a recognised feature of this landscape. The new antennas will be positioned in the same locations as existing radio equipment on the rooftop on the plantroom. The overall height of the apparatus will have a minor increase of approximately 1 metre which is necessary to ensure ICNIRP compliance. Taken as a whole, the antennas will be read within the same air space across the skyline and compared to the existing site at present the cumulative effects of the proposed equipment is minimal. Consequently, it is thought that visual amenity is not detrimentally impacted by this upgrade scheme but would in fact be maintained as a result of the minor development works. As a result the applicant considers the proposal to be acceptable in regards to its siting and appearance.

Following on from this, it is recognised that the equipment can be read at height from wider vantage points, as mentioned previously, the proposed works will offer a marginal visual change to the existing. In addition to this, there are several screening elements along the neighbouring road networks which will further reduce these views including buildings and trees which will partially screen the host building when viewed from various vantage points.

In summary the proposed design is considered to be respectful of the surrounding elements and the host listed building and does not cause detrimental harm to the visual amenity of the immediate environment. The siting and appearance of this proposal is therefore within the boundaries of acceptability as it will cause minimal interruption to the current landscape and is in line with the NPPF of utilising existing sites and buildings.

The works will be carried out by specialists who are used to working with listed buildings however there is very little change to the fabric of the listed building as the existing grillage and steelwork is utilised where possible.

4. PLANNING POLICY CONSIDERATIONS

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

4.1 LOCAL PLANNING POLICY

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

The Brent Development Management Policies (2016) document contains Policy DMP1 – Development Management General Policy and Policy DMP7 – Brent's Heritage Assets which are relevant in the determination of this application.

DMP1 – Development Management General Policy

- In relation to Policy DMP1a. it is considered that the location, siting, layout, scale, density, materials, detailing and design provide high levels of amenity as they are minimised so far as practicable to ensure that there is as little detrimental impact on the area as possible whilst also providing 5G coverage to the area.
- In relation to DMP1c., the proposed upgrade will ensure that 5G coverage is provided in the area, which in turn provides the necessary infrastructure for the area to remain connected and at an economic advantage.
- In relation to DMP1d., the site is located on a Grade II listed building. The proposal has been designed with the designation in mind to ensure that the perceived harm to the heritage asset is minimised so far as practicable and in line with the previous refusal the equipment has been contained within the footprint of the plantroom and does not create additional antenna locations. The redundant equipment will also be removed which will reduce the amount of equipment on the site and ensures that the footprint where the equipment is located is reduced.

DMP7 – Brent's Heritage Assets

- In relation to a., a clear understanding of the historic significance of the building was sought and taken into consideration during the designing of the scheme.
- In relation to b., the potential impact of the proposal on the heritage asset has been minimised by keeping the equipment in the existing location and utilising the existing equipment as much as possible. The public benefit of the proposal is that the upgraded equipment will allow the site to transmit 5G coverage. We consider that, given the Government targets for "the majority of the population to be covered by a 5G signal by 2027" (Connected Growth, 2019), that the benefits provided by the proposal outweigh the perceived harm.
- In relation to c., there is no loss of buildings, structures, architectural features, hard Landscaping and spaces, or archaeological remains, proposed.
- In relation to d., the significance of the heritage asset is sustained as the proposal is for the upgrade of an existing telecommunications site which is already an established feature on the rooftop. The equipment is located on the rooftop, away from the roof edges, and therefore it is considered that it respects the street scene and frontage of the building. It is also considered that the siting, design, height, plot and planform of the upgrade is appropriate as it is minimised as far as practicable to

ensure that the equipment is not overly dominating and is not dissimilar to the existing layout while still ensuring that there is sufficient coverage in this area.

- In relation to e., whilst it is difficult to argue that the proposal will necessarily contribute to local distinctiveness, built form, character or scale of the heritage asset, the scheme does propose the use of appropriate materials and the works will be carried out by contractors that have a track record of working on similar heritage assets.
- In relation to f., no demolition is proposed.

The site is also located within an area that is suggested as an extension to the Willesden Green Conservation Area. This change has not yet been adopted. In any case, it is not considered that the proposal will have a detrimental impact on the Conservation Area for the reasons given above.

In addition to the above, paragraph 4.18 of the DMP acknowledges that telecommunications is an essential component of modern economic infrastructure. It states that, where permission is required, proposals will be considered against national policy and advice, which seeks to reduce adverse impact by limiting the number of new masts, promoting sympathetic design and using camouflage where possible. In relation to this, the proposal is for the upgrade of an existing telecommunications site which will not increase the overall number of sites in the area.

4.2 NATIONAL PLANNING POLICY

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

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

Section 2 – Achieving Sustainable Development

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

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

Section 4 – Decision-Making

Paragraph 38 – *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”*

Section 6 – Building a strong, competitive economy

Paragraph 81 – *“significant weight should be placed on the need to support economic growth and productivity... this is particularly important where Britain can be a global leader in driving innovation.”*

Section 10 – Supporting high quality communications

Paragraph 114 – *“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.”*

In relation to these paragraphs, the Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, and sets out a delivery programme to make the UK a leader

in “artificial intelligence and big data”. The improvement of telecommunications capacity and provision of 5G is imperative to allow for areas to be connected, and is essential for economic growth.

Paragraph 115 – *“The number of radio and electronic communications masts, and the sites for such installation, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion... Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.”*

In relation to this paragraph, it is demonstrated that a sequential approach to site selection has been adopted to ensure that existing telecommunications installations have been explored in the first instance to prevent the proliferation of masts. A suitable existing base station was identified in this instance.

Paragraph 116 – *“Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:*

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

Paragraph 117 – *“Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:*

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

In relation to this paragraph, the site is not located within 3km of a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area. Nearby schools and nurseries in close proximity have previously been consulted. The local planning authority was consulted with regards to the proposed upgrade scheme and this scheme has been drawn up in consultation with them following a site meeting. An ICNIRP certificate is provided with this application to confirm that the proposal will not exceed International Commission guidelines. As the scheme is utilising an existing base station, it was not necessary to identify alternative site options.

Section 12 – Achieving well-designed places

Paragraph 126 – *“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*

In relation to this paragraph, the application seeks to upgrade an existing telecommunications site located on Kingsley Court and the proposed equipment is the least amount possible to allow the site to transmit sufficiently; we therefore consider this design to be respectful to the character of the area.

Although the site's change in appearance will to an extent be recognisable features of this street scene, efforts have been made to limit the visual impact on the surrounding amenity.

Section 16 – Conserving and enhancing the historic environment

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

In relation to this paragraph, the relevant historic environment records are referred to within this document within the Heritage statement (section 3.1), and the impact of the proposal on these historical assets are explained in section 3.2.

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

It is considered that the proposal is in accordance with this paragraph as the application seeks to upgrade an existing telecommunications base station. The upgrade has been designed sensitively to be respectful of these recognised heritage assets and retains the equipment in one location on the rooftop and utilises the existing equipment where possible.

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

4.3 LONDON PLAN 2021

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

With particular reference to Policy SI 6 (Digital Connectivity Infrastructure), the applicant is committed to fulfilling network obligations to cater current and future demands to ensure high quality coverage is provided which continues to be faster and stronger. In line with this policy the applicant has also demonstrated efforts to utilise existing base stations, rooftops or other structures prior to identifying new locations to fulfil network objectives. Ongoing network upgrades are an essential aspect of London's global competitiveness which is recognised in the latest Plan.

5. TECHNICAL JUSTIFICATION

In the assessment of this application, material weight should be given to the public benefits that will be provided to local residents and visitors in this area. The site will form part of an improved coverage network which will also introduce 5G technology to allow for faster download speeds and better signal. More information on 5G can be found in the accompanying documents: *5G and Future Technology, Connected Growth Manual Digital Infrastructure* and *The Institution of Engineering and Technology's Guide for Local Planning Authorities Regarding 5G Masts and Small Cells*.

The demand and focus on delivering the 5th generation of mobile phone technology is the primary objective of licensed operators in the UK. In today's climate the existing 4G network has allowed users to video stream at much faster data speeds allowing the integration of smart phones into wider uses

than previous generations. The inevitable consequence of technological advancements means that customers expect tasks to become even quicker and simpler.

To quote the *5G and Future Technology* document, *"It is estimated that 5G will directly contribute to an additional £7 Billion a year to the UK economy in just six years from roll-out. Although 5G will undoubtedly bring new opportunities and huge benefits to society, we cannot escape from the requirement that new structures, antennas and ancillary equipment will be needed. But to do so the network needs to be surveyed, designed and planning approval obtained. It has been acknowledged by Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks."*

The introduction of 5G technology will improve the country's digital connectivity and appeal to visitors and businesses alike through the creation of smarter technology which will benefit the British economy.

"Examples of this new world that will emerge from ubiquitous 5G coverage involves such things as connected and autonomous vehicles, traffic management, smart manufacturing with heterogenous autonomous machines, direct machine to machine communication, advanced medical devices, automated agriculture, far greater security provision, more stable and reliable connectivity and advances in further application development with uses not yet identified. All of the above provides an insight into the future development of connectivity in our modern world and also provides a further insight into the expected minimum eight-fold increase in data usage by each mobile operator over the next 5-6 years."

The national government recognises the importance of the 5G rollout which is a stance taken by government minister Margot James, the NPPF and The National Infrastructure Commission.

"5G has the potential to dramatically transform the way we go about our daily lives, and we want the citizens of the UK to be amongst the first to experience all the opportunities and benefits this new technology will bring..." – Margot James, the government minister for digital).

"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." – NPPF (July 2018)

"Getting 5G deployment right will be critical in a future where connectivity is becoming integral to almost all parts of the economy, and the UK will put its future growth and competitiveness at risk if it falls behind." – 'Connected Future' National Infrastructure Commission 2016

Although Central Government understands that this may present concerns with the various design solutions proposed, it is important that all Local Planning Authorities understand the technical needs of 5G and better understands the wider advantages of such new technology. The government have also expressed support for new telecoms installations and the deployment of new technology. It is seen as essential for the country to develop and exploit the advantages of such new technology to the direct benefit of the public and the economy.

Coverage

The licence granted to EE and H3G demands that strict coverage qualities are met nationwide. It is essential that the benefits of mobile phones are available across the population. Mobile networks are constantly reviewed to ensure that there is adequate coverage and capacity to meet customer demands. In the current environment there is an expectation for signal coverage to be available at home, in the workplace, while shopping, enjoying leisure activities or in transit.

Quality

In order to ensure there is sufficient coverage within buildings such as homes, shops, offices etc. the radio signal has to be of adequate strength to penetrate walls. In urban and suburban areas a dense

network of base stations is therefore required, which are sometimes less than 1 km apart. The improvement of 3G and 4G signal and introduction of 5G in this area will encourage economic advancement in accordance with the NPPF which seeks to develop connected environments.

Capacity

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

The Radio Implication of the Site

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

The radio planning tool identifies deficiencies in the network and predicts the location from which the optimum coverage will be provided. Within these areas existing base stations are selected for an upgrade. The proposed installation subject to this application stems from this process where it is imperative for mobile operators to provide high quality coverage to its customers. This is achieved through the improvement of existing network infrastructure and introduction of new base stations to fill in blank spots.

6. HEALTH AND SAFETY

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

In addition to this, The Institution of Engineering and Technology's *Guide for Local Planning Authorities regarding 5G Masts and Small Cells*, provides a brief overview of 5G technology and the health issues that are often misunderstood. It concludes by saying, *"Small 5G base stations in our towns and cities will allow improved network coverage. They will reduce radio wave exposure to individual smartphone users and improve local 5G capacity for all manner of useful bandwidth-hungry applications. And a good 5G fibre base local broadband infrastructure will be important to local communities over the coming decades in view of the ever-increasing amounts of data being consumed by the general public."*

7. CONCLUSION

A requirement for improved network coverage has been identified in this area. This is an upgrade of an existing site which will provide essential services for residents and businesses within the immediate vicinity. The proposed works have been designed sensitively in consideration for the character and appearance of the surrounding area and the previous reason for refusal and conversations held on a recent site visit. The location of the equipment has been minimised and where possible the existing equipment has been utilised. There is not a significant difference to the existing site although redundant steelwork will be removed. The public benefit of such an installation outweighs any limited visual harm to the heritage asset.

The applicant considers the proposal to be an acceptable development which considered the previous reasons for refusal and which should be viewed favourably by the local planning authority.