

## SUPPLEMENTARY INFORMATION

### 1. Site Details

Site Name:	Jameson House	Site Address:	Jameson House, Glasshouse Walk, London, SE11 5EX
National Grid Reference:	E530630, N178320		
Site Ref Number:	98394	Site Type: <sup>1</sup>	Macro

### 2. Pre Application Check List

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

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

#### Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	28 July 2023
Name of contact:	Chief Planning Officer
Summary of outcome/Main issues raised:	
<p>Pre-application consultation was sent to the London Borough of Lambeth via tracked email on the 28 July 2023. Given the fee and timescales for pre-application advice it was decided to proceed with a formal application as the best design has been put forward in order to achieve the technical requirements of the site, and due to the technical constraints that affect the design there is limited scope to alter the appearance of the site to a significant degree.</p>	

#### Community Consultation

Rating of Site under Traffic Light Model:	<b>Red</b>	Amber	Green
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<sup>1</sup> Macro or Micro

Outline of consultation carried out:

Pre-application consultation letters were sent by email on the 28 July 2023 to the Vauxhall Ward Councillors (Councillors Bailey, Jarnecki and Wrathmell).

A pre-application consultation letter was sent by email on the 28 July 2023 to the Member of Parliament for Vauxhall, Florence Eshalomi MP.

A pre-application consultation letter was sent by email on the 28 July 2023 to the Vauxhall Gardens Estate Residents & Tenants Association (VGERTA).

Pre-application consultation letters were sent by post to the following addresses on the 31 July 2023:

- Flats 1-25, Jameson House, Glasshouse Walk, London, SE11 5EX
- Flats 1-25, Kennedy House, Vauxhall Walk, London, SE11 3EU
- Flats 1-85, Arne House, Tyers Street, London, SE11 5EZ
- Flats 1-36, Darley House, Laud Street, London, SE11 5HW
- 113 - 115 (odd) Tyers Street, London, SE11 5HS
- 123 (3 Flats) Tyers Street, London, SE11 5HS
- 127 Tyers Street, London, SE11 5HS

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

To date there have been no responses received.

## School/College

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

A search of publicly available Department for Education and Ofsted records identified the following schools and educational facilities as being in proximity to the site location:

- Vauxhall Primary School, Vauxhall Street, London, SE11 5LG – approximately 85 metres from the application site.
- Lilian Baylis Technology School, 323 Kennington Lane, London, SE11 5QY – approximately 283 metres from the application site.
- St Anne's Catholic Primary School, 6 Durham Street, London, SE11 5JA – approximately 316 metres from the application site.
- St Mark's Church of England Primary School, Harleyford Road, London, SE11 5SL – approximately 480 metres from the application site.
- Lighthouse After School Club, All Nations Centre, Tyers Terrace, London, SE11 5LY – approximately 98 metres from the application site.
- Little Angel Nursery, Unit 1 Spring Mews, Tinworth Street, London, SE11 5AN – approximately 106 metres from the application site.

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

Pre-application consultation letters were sent via email on the 28 July 2023.

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

To date no responses have been received.

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

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
<p>Details of response:</p> <p>Consultation is not required as this is a full planning application, however, the following heliports were sent a safeguarding notice and drawings on the 28 July 2023:</p> <ul style="list-style-type: none"> <li>• King's College Hospital Heliport, King's College Hospital, Denmark Hill, London, SW11 3BE</li> <li>• London Heliport, Bridges Court, Battersea, London, SW11 3BE</li> </ul> <p>To date no responses have been received,</p>		

**Developer's Notice**

Copy of Developer's Notice enclosed?	Yes	No
Date served:	N/A – This application seeks planning consent and not prior approval. The relevant notice has been issued as per the information on certificate B.	

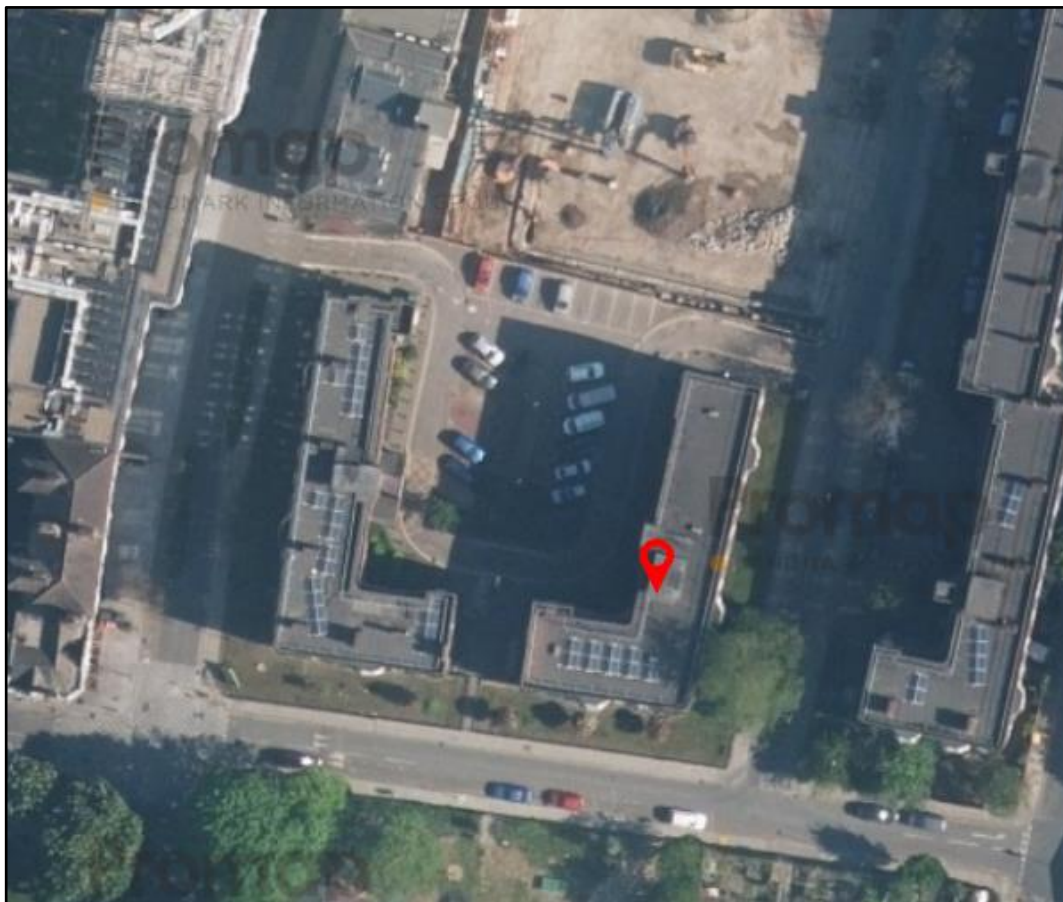
### 3. Proposed Development

#### The proposed site:

The host building is a 5 storey block of flats located within the Vauxhall area of London. The surrounding area is densely residential in nature consisting of mid level apartment blocks similar to the host building, with the Tea House Theatre and Vauxhall Gardens to the south. The wider area consists of a railway to the west and the River Thames beyond. There are high rise apartment blocks located to the west along the Albert Embankment and Vauxhall Train Station situated to the south. The host building is located within the Vauxhall Gardens Conservation Area but is not listed. Planning permission has been granted for a new 13 storey building directly to the rear of the host building.

The host building itself has a plant room located towards the centre of the roof with solar panels dominating the southern side. A parapet wall and handrailing surrounds the entire roof edge.

This application seeks the installation of mobile telecommunications infrastructure onto the roof of Jameson House. That infrastructure consists of 6no. antennas apertures grouped into sets of two mounted off the plant room 4no. 600mm dishes. The installation of 7no. equipment cabinets mounted on a steel platform on the south eastern side of the roof, along with ancillary development thereto.



**An aerial view of the Application Site**



**Ground level view of the host building from Glasshouse Walk**

**EE and Three currently have a joint radio base station located on the roof of Prince Consort House, however, this site is being lost from their networks for reasons beyond their control and the application proposal is for the replacement of that site for both operators.**

The proposal will not only provide continuation of services but will also result in undeniable improvements in mobile connectivity for the local area, and it is considered that the public benefits of this proposal greatly outweigh any perceived visual impact that the replacement structure may cause to the surrounding area.

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

Network information is provided separately within this application.

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

Description:

Proposed:

6no. antenna apertures

4no. 600mm dishes

7no. cabinets with the dimensions listed in the table below

Associated ancillary development thereto

Overall Height:

23.855 metres to top of antenna

Height of existing building ( <i>where applicable</i> ):	18 metres to top of plant room / 14.975 metres to top of parapet wall
<b>Equipment Housing: 1no. Link AC Mk5B</b>	
Length:	1.2 metres
Width:	0.6 metres
Height:	1.6 metres
<b>Equipment Housing: 1no. AIRO</b>	
Length:	1.5 metres
Width:	0.6 metres
Height:	2.1 metres
<b>Equipment Housing: 1no. Furo</b>	
Length:	0.75 metres
Width:	0.6 metres
Height:	2.1 metres
<b>Equipment Housing: 1no. H3G BBU</b>	
Length:	0.65 metres
Width:	0.7 metres
Height:	1.1 metres
<b>Equipment Housing: 3no. Cabinets</b>	
Length:	0.77 metres
Height:	0.77 metres
Width:	2.5 metres
<b>Materials (<i>as applicable</i>):</b>	
Tower/mast etc – type of material and external colour:	Steel / galvanised
Equipment housing – type of material and external colour:	Steel / (RAL 7035) light grey

Reasons for choice of design, making reference to pre-application responses:
<p>The choice of design is governed by two main factors; the context and visual amenity of the area; and, the technical requirements.</p> <p><b><u>Technical Objective and Technical Requirements</u></b></p> <p>The objective of this site is to ensure coverage to the area is replaced and enhanced, and disruption to the wider network is not caused, due to the decommissioning of a nearby telecommunications site along Albert Embankment DNS, Vauxhall, Lambeth, London, SE1 7TJ (cell site 59386). The existing site is required to be decommissioned and removed to make way for a new hotel, for which planning consent is in place. Consequently, the operators now require a replacement site in order to continue to provide coverage and capacity to this area so as to ensure there is no loss of coverage or disruption to the wider network.</p> <p>When a site is decommissioned the obvious impact felt is the loss of coverage that that site provided however, it can also cause greater disruption to the wider network. This is because each site connects to another, that one to another and so on, so if one is decommissioned the impact can reach far further than the immediate consumers. The objective, and need, for a replacement site in this area is henceforth established and justified but will be explained further in Section 4 of this document. Section 5 below further justifies why the proposal site is the best suited for the placement of a telecommunications site.</p> <p>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).</p>

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 amongst other things. Panoramic photographs are also taken at a series of increasing heights to determine the minimum at which nearby trees or buildings that could block or weaken signals can be cleared. In this instance, 18.65 metres has been calculated as the minimum height necessary for the antennas to clear surrounding clutter and remain compliant with the ICNIRP guidelines.

The dishes would be placed at 16.5 metres and 15.6 metres high where they can have clear connection to the core network – ensuring that seamless connection between the cells can be made above the surrounding buildings and trees and any other obstructions.

7no. equipment cabinets are required to house the radio equipment and will be arranged in a neat on the south eastern side of the main roof.

### Site Design

The purpose of the proposed works is to provide replacement 2G and 4G services and bring new 5G services to Vauxhall for both EE and Three. In order to achieve this an existing rooftop has been identified.

To achieve the required replacement coverage and network improvement it is proposed that an existing building be utilised, and the bulk and scale of the existing building ensures the impact of the development would be kept to an acceptable level. The scheme entails 6no. antennas mounted on simple steel poles off the plant room roof. The antennas are required to be mounted on the roof of the plant room so they gain sufficient height to prevent the signal being clipped by the edges of the building. The use of simple pole mounts is considered visually preferable to a taller stub tower design as it would represent a heavier and a more industrial structure in appearance. The steelwork, which will support the antenna apertures, will also be able to accommodate the ancillary development. Furthermore, the height of the antennas is the lowest which would provide the required levels of coverage whilst also ensuring compliance with ICNIRP guidelines.

The height and size of the building means that the proposed antennas would not represent an incongruous addition into the surrounding landscape, and would be seen in the context of the newly built 13 storey building on the northern side of the host building, thus mitigating any visual impact upon the surrounding conservation area and heritage assets within the locality

Radio signals are generated within radio equipment housing cabinets. In this case, 7no. equipment cabinets are required to produce the required replacement coverage and will be placed in a neat arrangement on the south western side of the main roof. Due to height of the building and adjacent mature tree, they will not be viewed from ground level.

There is very limited scope to alter the design in order to meet the technical requirements of the site, nonetheless it is considered the proposal now put forward is appropriate to the site and its surrounds. It is considered that the proposed development is a sensitive design given the technical restraints and will not cause visual harm or unacceptably alter the visual amenity of the area or the host building.

Due consideration has been given to the process and this 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. The guidance given by the Government on the balance Local Authorities must take between

these two factors – technical achievements of telecommunications developments and visual harm – will be clarified in Section 5 of this document under ‘Policy’.

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



Technical Information

<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)</p> <p>International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.</p> <p>When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, EE and Three operate their networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p> <p>As part of EE and Three's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance 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.</p> <p>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.</p>	<p><b>Yes</b></p>	
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### 3. Technical Justification

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

The development is required to provide replacement coverage for two networks when the existing site located along the Albert Embankment is decommissioned. The development will also provide improved connectivity and network enhancement for EE and Three in the area as well as providing new 5G technology. As noted above, apart from providing enhanced 2G and 4G coverage, 5G coverage will be deployed from the site ensuring that the surrounding area benefits from the latest technology.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV and downloads. The base stations are connected to each other and by cables or wireless technology to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. Because base stations are low powered radio transmitters, they each have a limited range, meaning that they generally need to be located close to the area requiring coverage.

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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 Digital Infrastructure Minister, Matt Warman, in his keynote Speech at the Connected Britain Conference 2020 referred to the internet as the *"fourth utility"* and went on to state that *"for countless people across the country, having fast and reliable broadband and a good mobile connection is as essential and vital to our daily lives as gas, water and electricity"*. He went on to acknowledge the importance of connectivity during the Covid pandemic, *"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"* and also recognised that *"changes such as increased working from home will stay with us for the foreseeable future"*.

Most recently the Government has referred to the importance of the digital infrastructure as being integral within its paper on *"Levelling Up the United Kingdom"* (2 February 2022) in which it was recognised that *"improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working."*

*More broadly, high quality digital infrastructure can deepen local labour markets through remote working, making it more attractive for both workers and companies to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive growth and jobs in new areas"*.

It is considered that when the balancing method advocated in the NPPF is applied to the proposal, where the need and significant public benefit of ensuring continuous network coverage is provided, 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.

In recent years, there have been an increasing number of telecommunications appeal decisions which have been overturned by the Planning Inspectorate.

To emphasise this point, the following two rooftop schemes below were originally refused but subsequently overturned by the Planning Inspectorate, are detailed below.

In February 2020, the decision of Norwich City Council to refuse planning permission for the installation of 6no. antenna apertures, 4no. dishes and 7no. equipment cabinets was overturned by the Planning Inspectorate (MBNL (EE Ltd and H3G UK Ltd) against Norwich City Council, appeal reference APP/G2625/W/20/3254009). There are a number of similarities between the appeal proposal and the application proposal including the design and that both are located within conservation areas within proximity of heritage assets. Despite this, within the decision notice, the Inspector stated that, in reference to the proposed antennas:

*“The development would, in the face of the loss of a nearby existing site, provide public benefits in terms of continuity of public access to existing signal for users of the networks which it would provide, together with access to 5G connectivity. I note that one of the service providers has been awarded a contract by the Home Office to provide future communications for the emergency services. The Government recognises and supports the economic and social benefits and importance of the development of high quality, reliable electronic communications services. I attach significant weight to the public benefit arising from the continuation of local service provision and securing future coverage of the area for emergency services communications.”*

*“The proposal would result in a limited level of harm to the significance of a designated heritage asset. However, the harm must be considered in the context of the special attention I must pay to the desirability of preserving or enhancing the character or appearance of the CA. I afford considerable importance and weight to this statutory duty. This does not amount to a direction to refuse proposals that harm, and thus fail to preserve, designated heritage assets, but it provides a strong presumption in favour of preservation.”*

*“In applying the balancing test of paragraph 196 of the Framework, I consider that the benefits identified above substantially outweigh the harm that would arise from the proposal’s impact on the character and appearance of the CA.”*

*“Thus, I find that the material harm that would arise from the proposal would be outweighed by its substantial public benefits. Accordingly, there is clear and convincing justification for the proposal to proceed, in accordance with the Framework.”*

In November 2020, the decision of the London Borough of Islington to refuse planning permission for the installation of 12no. antennas, dishes and cabinets was overturned by the Planning Inspectorate (Telefonica UK Limited against the London Borough of Islington, appeal reference APP/V5570/W/20/3251047). Again, the design and circumstances are similar to the application proposal in that they are both located within conservation areas and within proximity to heritage assets. Both this case and the application proposal are for sites which are required as a result of the impending loss of an existing site and the Inspector recognises the siting constraints these circumstances bring:

*“As a proposed replacement installation, the potential area in which the equipment could be installed to ensure continuity of network coverage and capacity is necessarily limited.”*

*“I have found that the proposal would fail to preserve or enhance the character or appearance of the Bunhill Fields and Finsbury Square Conservation Area, and would cause less than substantial harm to the significance of the Conservation Area as a designated heritage asset. In this respect I have also found conflict with planning policies, and indeed the proposal would conflict with the development plan as a whole”.*

*“However, I have also found that a significant public benefit would be delivered through the provision of improved mobile communications networks, which would outweigh the limited harm to the heritage asset which I have identified. The material considerations therefore indicate that, in this case, the proposal should be determined other than in accordance with the development plan”.*

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.

As introduced above in Section 3 of this document, the objective of this site is to provide replacement coverage and capacity to the area. The installation of this proposal will also provide new 5G coverage and capacity.

2G was the second generation of cell 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 that 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. In simple terms 4G allows for data transmission as well as text services as mobile phones, computers and other portable electronic devices access the internet wirelessly and so for this reason 3G technology is being phased out.

**EE will become the Emergency Services Network Provider and their 4G network will be utilised for this purpose. During the current climate it is even more essential to maintain all current services for not only current users but for the emergency services also.**

5G is the latest technology which is still being rolled out nationwide, for this reason, there is not yet a blanket of 5G coverage and this Site works towards achieving reliable 5G services for users at home and on the go. As 5G becomes more widespread, a comprehensive covering of 5G reception can be expected.

The proposed site will not only provide replacement coverage to the surrounding area but will also bring replacement and additional capacity. Capacity is the volume of call and data traffic that can be handled by any one base station at any given time and is a critical network consideration, especially important in high traffic areas with large populations where call volume is higher and cell areas often smaller due to the density of development. Indoor coverage provision is imperative across the UK, arguably more so within densely populated areas such as this where the ongoing construction of new apartment blocks means the requirement for additional capacity is growing rapidly. Without the installation subject to this application, the vital indoor levels, which allow customers to access services from within buildings, would simply not be achieved.

In 2019, Barclays released a report titled "5G: A transformative technology" which included projections of economic growth based on the uptake of 5G by businesses. The report included three scenarios, a pessimistic view, a central view and an optimistic view which considered the outcome of the development of a national 5G network at a slower rate, orderly pace, or faster uptake, respectively. The annual business revenue by 2025 was projected to increase by £8.3bn in the slowest scenario and by £15.7bn in the fastest scenario. This would add 101,300 extra jobs by 2030 in the slower paced uptake, and 171,900 additional jobs in the faster uptake. This is just one example of the huge economic advantage that a reliable, widespread 5G network could achieve. The Application Site forms an integral part of the Network and works towards achieving economic growth for the UK economy.

It is our view that this proposal is exactly the type which the government is endorsing. The Application Site would work with the surrounding infrastructure to ensure a good stable connection even as users transfer

from one cell area to the next. The Application Site will enable both EE and Three to provide replacement coverage to Vauxhall as well as bring new 5G technology, benefitting both voice and data services. The Application Site will increase capacity as well as improving the resilience of the Network in this area. The Applicant has designed the site so as to have minimal aesthetic impact on the surrounding area and yet meet the coverage need.

In 2022, the UK Government published the Code of Practice for Wireless Network Development in England. This sets out the legal and policy framework as well as the principles that Mobile Network Operators should follow. Within this document, the Government recognises that *“Digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK.”*

The Government also notes the importance of widespread connectivity, enabling users to access services at home and on the go: *“As the demand for mobile data in the United Kingdom is increasing rapidly, **it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.**”*

At a local level, this installation allows 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, which is helpful in supporting the sustainable development agenda in line with Lambeth’s policies (as discussed below).

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 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.

The very high level of mobile phone use and ownership within the UK population is a 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 benefits of reliable mobile connectivity and 5G provision are widely recognised. The government recognises the importance of advanced communications infrastructure, such as the proposed development, as a key driver of economic growth. It considers digital connectivity as an essential service that should be readily accessible to everyone. In the latest report by the Department for Science, Innovation and Technology ‘UK Wireless Infrastructure Strategy’ April 2023, in the foreword the Secretary of State states that *“Connectivity has brought benefits for British households and British business, boosting growth, productivity, and opportunity for all. And change shows no sign of stopping. In fact, we find ourselves on the brink of a new revolution which promises to transform the world once more.”* She further states that *“5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone 5G will drive growth in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. 5G can improve our public services, too, in everything from education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis.”* *“This is an incredible opportunity; widespread adoption of 5G could see £159bn in productivity benefits by 2035. And it is exactly the kind of opportunity which the Department for Science, Innovation and Technology was created to seize. It is my personal mission as the Department’s first Secretary of State to put Britain right at the forefront of scientific and technological progress. By bringing together world-class research and a dynamic business ecosystem, we can harness enterprise and innovation to grow the economy, driving forward the delivery of one of the Prime Minister’s five priorities.”*

The report sets a bold ambition for the UK to have nationwide coverage of standalone 5G to all populated areas by 2030. *“Given the substantial potential that 5G offers for businesses and public service delivery, we are setting out a bold vision for the next generation of our national networks to galvanise investment across our economy. We want to move beyond the basic 5G that is being deployed now over 4G networks to build higher quality, standalone 5G networks that do not rely on older infrastructure. We also want to extend 5G coverage well beyond cities and towns to all populated areas of the UK, including rural villages and communities.”*

In the same report, in the foreword by the minister of State, she states that *“delivering world-class digital infrastructure to all Britons is a fundamental mission of this government - and our efforts to build it the modern equivalent in scale and ambition to the Victorians’ construction of the railways. Our plan is for every corner of our country to get lightning fast connectivity, not only to give people real choices about where to live and work today but so they will not be left out of future technological revolutions because of poor infrastructure.”* *“Although it is impossible accurately to predict when large scale demand for 5G and other forms of advanced wireless connectivity will emerge and how widespread that will be, mobile data provided over public mobile networks has grown 40% per year on average over the last decade and we expect to see continued growth in data traffic over the next decade. Ofcom’s Mobile Market Review suggests data growth could range from a 25% increase per year to 2030 to 55% increase per year to 2030.”*

The importance of mobile technology, more generally, in the UK, and its contribution to the sustainability agenda is further emphasised in a series of annual communication market reports published by OFCOM, the latest version is the ‘Communications Market Report 2022’. According to this report, telecoms revenues made a £31.1 billion contribution to the UK economy in 2021 of which 12.3 billion was generated from retail mobile telecoms services. The report also highlights the increase in the use of mobile technology.

The growth of mobile usage and increase in demand for mobile data is further highlighted in Ofcom’s report ‘Mobile networks and spectrum - Meeting future demand for mobile data (9 February 2022)’. According to this report *“In recent years we have seen an average 40% year-on-year growth in demand for mobile services provided over public mobile networks. This growth has been driven by the development of new applications and enabled by evolving technologies and consequent changes in consumer behaviour”* (paragraph 2.6). *The demand for mobile data is expected to “continue to grow as we rely on it ever more to carry out daily activities like shopping, gaming, banking and watching movies. Demand is likely to be stimulated further as new and more sophisticated applications are developed, and by the development of machine-to-machine and machine-to-device applications”* (paragraph 2.7).

In paragraph 1.1 of *“Ofcom’s future approach to mobile markets and spectrum”* report, it is stated that *“We expect demand for mobile data to continue to grow as greater use is made of data-hungry services and as new technologies enable new uses.”* *“Network quality is likely to be of growing importance to customers”* (paragraph 1.2). Reliable and advanced infrastructure like the proposed development is required to support the increasing demand on the networks and to support the latest 5G technology required to deliver advanced mobile capabilities.

There is a clear need for continuity of services as the way people lead their lives is changing, as our dependence on these mobile networks increases. The emergence from lockdowns has seen a continuation of homeworking for a considerable proportion of the Country’s workforce with the likelihood that this will continue, which has entailed the conducting of business meetings and attending conferences online which are integral in the economic recovery. Online grocery shopping and video calls to family members and friends have also continued and so the need for this replacement site is driven by our increased dependence on Operator networks that has grown year-on-year.

#### 4. Site Selection Process

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

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

In accordance with planning policy, a sequential approach to site selection was adopted. The application site was selected following a thorough search and detailed investigations. The decision factored multiple considerations, including:

- distance from the base-station it will replace;
- ground conditions and elevation level;
- ability to acquire the land;
- vehicle access to build/maintain the base-station;
- potential for neighbouring trees & buildings to obstruct radio signal;
- minimising environmental impact, including protecting designated areas

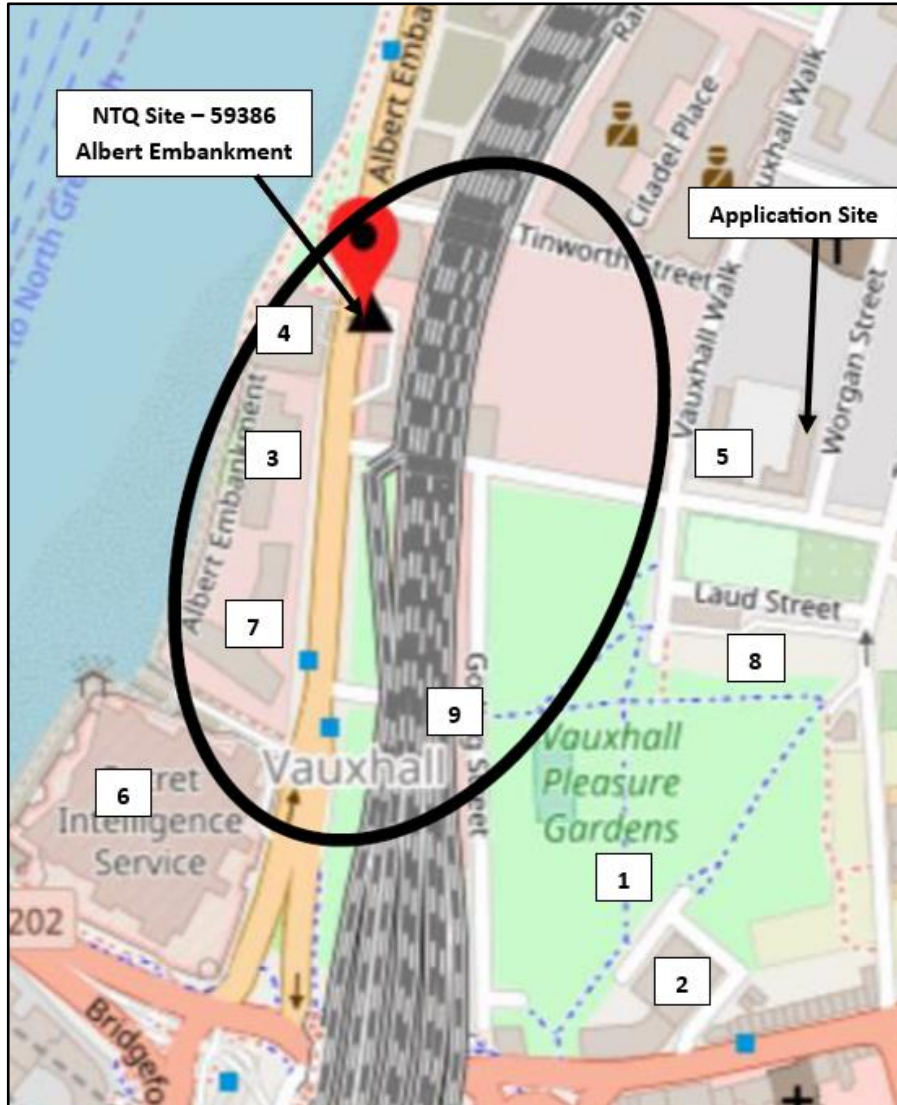
On the matter of alternative sites, an appeal decision by the Planning Inspectorate clarifies that it is an unreasonable expectation to consider every potential siting option when searching for a site to install communications apparatus. The reference to the superseded PP8 still stands in the replacement NPPF:

***'Nor do I consider that it is realistic or reasonable to take the view that the absence of consideration of every possible option alternative would mean this element of the policy was not complied with. PPG 8 does not indicate the need to embark on an examination of every possible alternative in an iterative process. As accepted at the Inquiry by the Council's planning witness, the adequate analysis of feasible alternatives is a more realistic approach, a view with which I concur'*** (para. 12) (appeal ref. APP/Y3425/A/02/1084110)

It should be noted at this juncture that within the Appeal Decision, in relation to the decision made by Oxford City Council to refuse prior approval for a telecommunications development (ref. APP/G3110/A/2028086), the Inspector commented in relation to alternative sites as follows:

*"The appellants have identified a number of alternative sites which were ruled out by them for technical reasons, or because the equipment would be more visually intrusive or, more commonly, because the owners of the land concerned were unwilling to host the equipment. The Council does not dispute these explanations, but criticises the appellants for not providing documentary evidence to support their claims that alternative sites are unavailable. I attach little weight to this. The application has been submitted by a professional planner who is under a duty to act with competence, honesty and integrity. Unless the Council has any substantive reason to question the information about alternative sites, I see no reason to require documentary evidence to buttress what the appellants say about landowners being unwilling to host equipment".*

The area from within which a site will be capable of providing the desired replacement coverage, the “search area”, is determined by the network radio planners and is indicative and subject to change. The land uses within the area are mainly mixed use comprising of predominantly high rise buildings, typical of a city landscape, with a railway line running directly through the centre, Vauxhall Pleasure Gardens to the south east and the River Thames so the far west. The search area is entirely within a number of conservation areas which makes avoiding locating a site within this land designation impossible. The number of listed buildings within the vicinity are small. The purpose of the Application Site is to replace coverage and capacity when the existing streetworks site located outside the Texaco Petrol Station is removed, and also provide new 5G services to this part of London.



**Map of discounted options with the search area denoted by the black circle**

	Site Type	Site name and address	National Grid Reference	Reason for not choosing site
1.	Streetworks	Land off Goding Street, Vauxhall, Kennington, Lambeth, London, SE11 5HW	530551, 178125	This option was the original replacement option and entailed a streetworks style development. A prior approval application was refused (ref. 23/00805/G24) for the development and for this reason pursuing a streetworks site within Vauxhall Pleasure Gardens has been discounted.



2.	Rooftop	Muscovy House, 8 Auckland Street, Vauxhall, London, SE11 5AB	530584, 178089	The building is located within the Vauxhall Conservation Area. The building comprises of a flat roof with solar panels. Due to the the solar panels there is in sufficient room to locate all the telecommunications apparatus required. There is also no internal roof access, which is required in order to allow maintenance and servicing of the site. These matters mean this building is not suitable for this type of development. It is also considered that this does not represent a superior location in planning terms than the Application Site.
3.	Rooftop	Tintagel House, 92 Albert Embankment, London, SE1 7TY	530380, 178322	The building is located within the Approaches to Westminster World Heritage Site and the Albert Embankment Conservation Area. Due to the plant apparatus already located on the roof, there is insufficient room to locate the required telecommunications apparatus, therefore, this option is not suitable for this type of development. It is also considered that this does not represent a superior location in planning terms than the Application Site.
4.	Rooftop	Peninsula Heights, 93 Albert embankment, London, SE1 7TY	530385, 178384	The building is located within the Approaches to Westminster World Heritage Site and the Albert Embankment Conservation Area. Due to the plant apparatus already located on the roof and the window cleaning surrounding the roof edge, there is insufficient room to locate the required telecommunications apparatus, therefore, this option is not suitable for this type of development. It is also considered that this does not represent a superior location in planning terms than the Application Site.
5.	Rooftop	Kennedy House, Vauxhall Walk, Vauxhall, London, SE11 5EU	530604, 178317	This building is adjacent to the Application Site and is also located within the Vauxhall Gardens Conservation Area. Due to the positioning of the solar panels and chimneys, which area not present on the Application Site, there is insufficient space to locate all the required telecommunications apparatus. It is also considered that this does not represent a superior location in planning terms than the Application Site.
6.	Rooftop	SIS Building, 85 Albert Embankment, Vauxhall, London, SE11 5AW	530335, 178122	The building is located within the Approaches to Westminster World Heritage Site and the Albert Embankment Conservation Area and is also locally listed. There are two high sections of the flat roof that could potentially lend themselves to this type of development. However, the adjacent taller building would block the signal from the antennas and so stop the coverage from propagating along the Albert Embankment. Therefore this option would provide the required replacement or new 5G network coverage. It is also considered that this does not represent a superior location in planning terms than the Application Site.

7.	Rooftop	89 Albert Embankment, Vauxhall, London, SE1 7UQ	530367, 178226	The building is located within the Approaches to Westminster World Heritage Site and the Albert Embankment Conservation Area. This option is located has been discounted as it would not provide sufficient replacement coverage to the eastern side of the search area. It is also considered that this does not represent a superior location in planning terms than the Application Site.
8.	Rooftop	Darley House, 19 Laud Street, London, SE11 5HW	530607, 178235	This option has been discounted due to the presence of a Grade II Listed War Memorial located on the building. The application site offers an opportunity to meet the coverage requirement without any impact to a Listed Building and as such holds greater planning merit.
9.	Existing Site	Network Rail Site, Goding Street, London, SE1 7TP	530607, 178235	This existing site belongs to Network Rail. Network Rail do not allow their sites to be shared by Operators and so this site is not available to the Applicant for sharing.

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

N/A

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

**Environmental Information:**

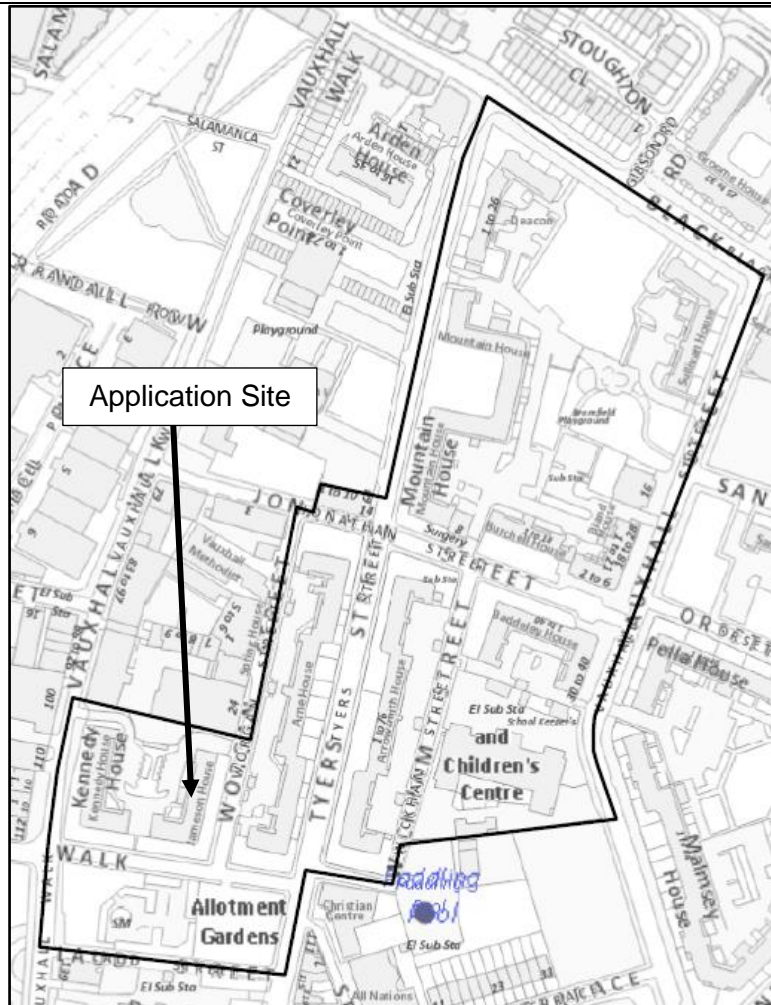
The host building is not located in an area considered to be environmentally sensitive, or within an identified protected habitat or protected species area. The proposal will subsequently not have any potential negative impacts on any sensitive habitats or species. A check of the Environment Agency website has confirmed the site is within a very low risk flood zone with the chances of flooding at less than 0.1% each year, furthermore, the development is not located at ground level and so would not be impacted by any flooding in the unlikely event it should occur.

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 amenity, surrounding heritage assets or the setting of the Vauxhall Gardens Conservation Area.

**Heritage Statement:**

The Code of Practice for Wireless Network Development in England (2022) emphasises that “*where possible, operators should look to use existing buildings/structures for hosting wireless infrastructure*”, encouraging the use of existing buildings to improve connectivity where possible, such as in this case. The technical requirement can be met through utilising an existing building and will be replacing an existing site which has been earmarked for decommissioning, therefore the number of telecommunications sites within the locality will remain neutral. It is therefore considered that the siting of the proposal is wholly appropriate.

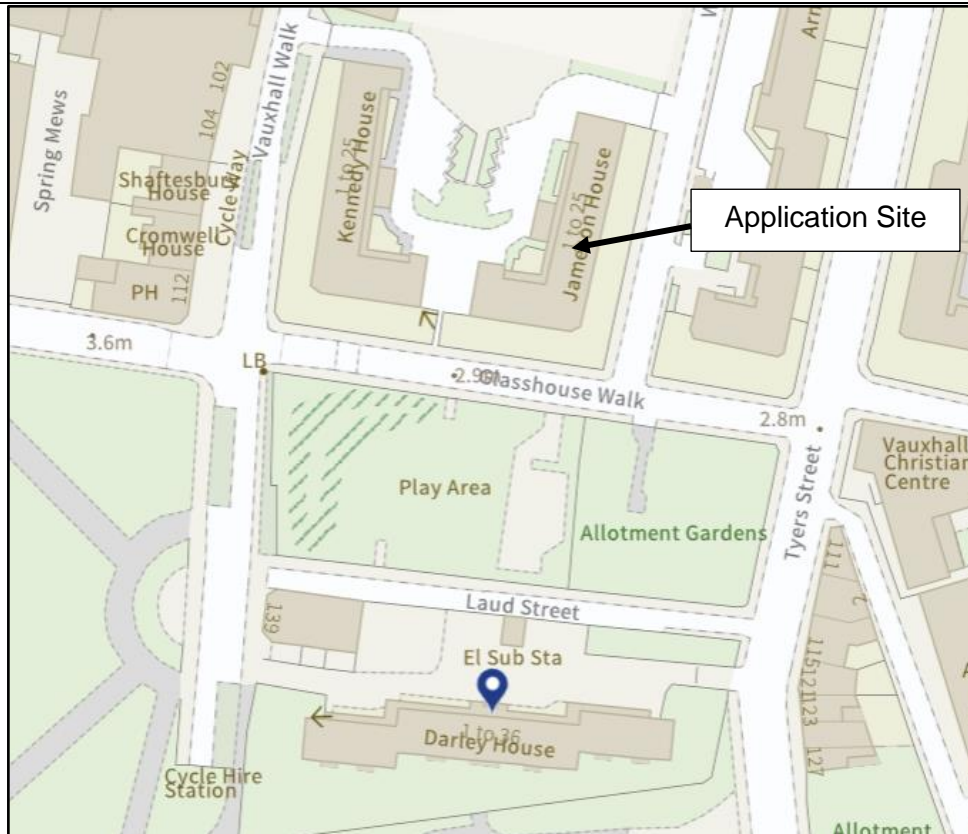
The host building is located on the south eastern side of the Vauxhall Gardens Conservation Area:



The London Borough of Lambeth Conservation & Urban Design Officer Report for the Vauxhall Gardens Conservation Area describes the area:

*“working class origins which represents one of the few remaining such districts in the borough to survive the Blitz, post war clearances and redevelopment and more recent gentrification.....Although a little run down, the area benefits from proximity to the River, the survival of associated local traditional character and a reasonable number of attractive industrial buildings”.*

The allotments and Glasshouse Walk are a noted feature within the conservation area appraisal. So is the host building, although itself is not listed or within the curtilage of a listed building. The nearest listed building is approximately 70 metres to the south and is the Grade II Listed Following the Leader (Memorial to the Children Killed in the Blitz) (List UID: 1430235):



**Map of the Application Site in relation to Grade II Listed Following the Leader (Memorial to the Children Killed in the Blitz) (List UID: 1430235), denoted in blue and white (Source: Historic England Map)**

Although the host building is not listed or locally listed, it is cited within the conservation area appraisal as being within a distinctive group of “*inter-war flats of particular interest*”:

*“They are of a design not evident anywhere else in the borough and are of considerable character. The most notable features of the elevational treatment are the Odeon style rounded brick corners to the four blocks, enhanced by a subtle contrast in alternating horizontal bands of brown brickwork and broken up by prominent white rendered oriel canted bay windows extending the full height of the building from first floor upwards”.*

In terms of heritage assets, the NPPF notes the following in paragraphs 203 and 205:

*“In determining planning applications, local planning authorities should take account of:*

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness.”*

*“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be.)”*

Lambeth’s Local Plan Policy Q22 is the policy relevant to Conservation Areas, the relevant sections are as follows for ease of reference:

*A. Development proposals affecting conservation areas will be permitted where they preserve or enhance the character or appearance of conservation areas by: i. respecting and reinforcing the established, positive*

*characteristics of the area in terms of the building line, siting, design, height, forms, materials joinery, window detailing etc; ii. protecting the setting (including views in and out of the area).*

In considering the development proposal, a key consideration is the balance of preserving the conservation areas and the heritage assets within it while also enabling the economic growth and the social needs of Lambeth to be suitably served by quality electronic communication services.

The antenna apertures have been kept as low in height as technically possible and are required to be located on the plant room roof in order to avoid the radio signal being clipped by the roof. If the antenna apertures were located on a stub tower a taller height would be required. A stub tower is a more substantial and industrial structure in appearance than the pole mounts which are being proposed and therefore would have a greater visual impact upon the host building and the surrounding conservation area and skyline. The proposed equipment cabinets would be arranged together and neatly south eastern side of the main roof, and due to the height of the building and adjacent tree, they would not be viewed from ground level.

For operational reasons, it is imperative that the antennas sit above the rooftop so that network signals are not obscured or blocked. In order to negate the impact of the deployment of these antennas, the supporting steelwork is as minimal as operationally possible. It should also be noted at this point that a 13 storey development located directly to the rear of the host building is currently in the process of being built, this development will overwhelmingly dominate the immediate area and will dwarf the host building and the adjacent building, Kennedy House. When the application proposal is viewed from the surrounding area, and in particular from the Grade II Listed memorial to the south, given the scale of this new modern building, it will not appear and incongruous addition within the surrounding landscape, to the contrary the proposal will appear as nothing out of the ordinary, and, over time, will become part of the accepted built environment, thus also minimising any impact upon the host building.

Indeed, the scale and amount of apparatus proposed is small relative to the scale of the wider building. When considering the Conservation Area as a whole, the relative scale and associated effect of the apparatus is diminished to acceptable levels and to a confined geographical area. In the context of the NPPF, para. 207, a case is made that the affected element of the building's rooftop does not make a notable contribution to the significance of the conservation area.

It is material that the rental income generated from communications equipment would make a contribution to the host building's 'viable use'. Furthermore, while the mobile base-station is located within the conservation area, it will also serve a high number of residents, businesses, tourists and commuters in the designated area; thereby enhancing the function of the conservation area and providing public benefit which includes contributing to 'sustainable communities' and 'economic vitality'. The proposal accords with paragraph 203 of the NPPF in this respect.

It should also be noted that paragraph 208 of NPPF states that "*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 securing its optimum viable use*".

As above, it is considered that the proposed will not bring about substantial harm to the character of the host building, the conservation area or the heritage assets within it, on the contrary, it will bring benefit to the public through improved connectivity and communications services.

It is considered that the proposal will have no impact and so 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 proposal achieves this. The benefits of the proposal however also need to be considered. In this case the public benefit from improved connectivity and wireless communication services.

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 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 proposal, 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.”*

*“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.”*

*“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.”*

*“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.”*

While each application needs to be assessed on its own merits, the above appeals (along with a growing number of others) indicate a growing trend, based on national policy and guidance, to favour important utilities infrastructure developments and upgrades in the wider public interest when the potential harm is outweighed by the important and unavoidable public benefits they provide.

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. As such, equilibrium will be achieved between technical requirements and environmental impact.

### **Planning Policy Context:**

#### **National Planning Policy Framework (2023) (NPPF)**

The NPPF provides national policy for all planning matters. The specific points of interest relating to this telecommunications installation are noted below.

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***”.

Paragraph 11 states “*Plans and decisions should apply a presumption in favour of sustainable development...*”

*“For decision-taking 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.”

Paragraph 20 states that strategic policies should “make sufficient provision for:

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

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 Site will allow the continued provision of reliable mobile communications services to Vauxhall 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.

Leading on from this, Section 10 of the NPPF addresses supporting high quality communications infrastructure. Paragraph 118 sets out 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.” The Application Site is exactly the kind which is working towards this Government aim.

While supported, the number of base stations is encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 119 states that “The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged”. Whilst a new site is proposed within this application, it will be replacing an existing site within the area and so the number of base station will remain neutral. Furthermore, the proposal entails utilising an existing building and involves both EE and Three sharing the site. It has been detailed that numerous siting options were considered prior to the final decision being made to deploy a replacement rooftop site, but that none proved both feasible and more suitable than the option now put forward.

It should be noted that paragraph 122 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.

The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal, to provide a replacement high-quality services in Vauxhall, including new 5G technology, will assist in achieving these objectives. The proposal outlined within this document is in complete accordance with the guidance as set out in the National Planning Policy Framework.

## 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 the London Borough of Lambeth, relevant to the proposal, comprises:

- The London Plan: Spatial Development Plan for Greater London (March 2021)
- The Lambeth Local Plan 2021

### The London Plan

The London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area.

Policy D2 Infrastructure requirements for sustainable densities – this policy recognises that infrastructure providers, which includes mobile Operators, will need to provide additional infrastructure capacity to meet future development. Increasing network capacity is one of the aims of this proposal:

*'Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), **boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time**' (part B) (emphasis added).*

Policy SI 6 Digital connectivity infrastructure – this policy is more explicit in requiring that new developments should meet increased demand for mobile services. The use of building rooftops to accommodate communications infrastructure, as is proposed at the Application Site, is also encouraged:

*'To ensure London's global competitiveness now and in the future, development proposals should: (2) **meet expected demand for mobile connectivity** generated by the development... (3) **support the effective use of rooftops** and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.'* (emphasis added).

The importance of the role that the digital sector plays in economic growth is further recognised in paragraph 6.8.3 stating that it *'supports the growth and evolution of all sectors in the economy.....The Mayor will support the growth of the tech and digital sector across all of London'*.

Policy SI 6, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing EE and Three to provide continued coverage to the surrounding area.

### 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. EE and Three are currently in the process of successfully rolling-out 5G within London. Deployment of the proposed base station will also 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”.*

An existing site is required to be decommissioned for reasons beyond the Operator's control and it is imperative that replacement coverage and capacity is provided in this particular area of London in line with the expressed aims of the London Mayor's office and Government. This proposal seeks, individually, to provide enhanced and continuation of services to remedy this matter wholesale.

### Raising London's High-Speed Connectivity to World Class Levels

The Mayor's report: *'Raising London's High-Speed Connectivity to World Class Levels'* provides the background to and amplifies Chapter 16, Digital Connectivity, of his Infrastructure Delivery Plan. The report notes, the availability of internet access not only affects the productivity of businesses and proves essential to the future growth of many firms, it is also vital for many residents to take part in modern society, as more services move online. The report also notes among other matters, that:

*“Mobile operators already experience difficulty obtaining permission from local authorities...to increase capacity for their networks in areas where there is high demand. The Mayor, therefore, will be working with central Government and London's local authorities to ensure that strategic communication networks are enabled rather than inhibited by the planning and other regulatory systems”.*

As a last resort and having regard to the strategic importance of London Plan Policy 4.11, the report states:

*“The Mayor has overall strategic responsibility for planning in London...The communications network of London is clearly one of strategic importance. Should the implementation of the London Plan across strategic agencies not provide the adequate flexibility for the development of a robust communications network, whether based on existing technologies or future ones, the Mayor will seek to bring planning applications for communications infrastructure within this strategic responsibility, with the ability to take them over for his own determination...”*

### The Lambeth Local Plan 2021

**Policy T9: Digital Connectivity Infrastructure** outlines considerations for telecommunications development in the council area. The supporting text recognises that:

*“8.46 Advanced, high quality and reliable communications infrastructure is essential for economic growth and social wellbeing and can help relieve pressure on the transport network by reducing the need to travel. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration. Better digital connectivity with a focus on affordability, security, resilience and the provision of appropriate electrical power supply should be promoted across the borough. The council is preparing a Digital Connectivity Strategy to further this objective and support the aims of the UK Digital Strategy.”*

The supportive text goes onto state that:

*“Operators are encouraged to place antennas on existing masts or buildings, to reduce their visual impact. Where this is not possible, a new mast may be the only option. The council will ensure that this is sensitively designed and that use is made of existing or new screening, such as trees, fences, buildings or painted glass reinforced plastic (GRP) to camouflage all or part of the proposal – including the use of shrouds, screens and other camouflaging methods to minimise the impact of equipment in prominent locations.”*

It should be noted that GRP shrouding presents difficulties in this instance due to the higher 5G frequency bandwidth that EE have utilised which means that the signal is unable to penetrate the GRP shrouding sufficiently enough to bring the required level of 5G coverage to the area. Although GRP shrouding cannot technically be deployed in this instance, as minimal design as is available has been proposed.

For ease of reference, the policy itself is provided below:

*'A. The council supports the delivery of high quality digital infrastructure to enable the future expansion of electronic communications networks, including next generation mobile technology and full fibre broadband connections. The council will require provision for digital connectivity infrastructure in accordance with London Plan policy SI6.*

*B. Proposals for electronic communications equipment, including applications for determination for prior approval procedure under Part 16 of the General Permitted Development Order 2015, will be supported if:*

- i. the siting, height and design of the equipment will not cause harm to the character or appearance of the areas or the building on which it is located, including the significance and setting of historic assets, and will not be visually intrusive in the street scene or create unacceptable clutter;*
- ii. it can be demonstrated that the equipment will meet International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines on the limitation of exposure of the general public to electromagnetic fields;*
- iii. in the case of a ground-based or other installation, the possibility of using an existing building, mast, other structure, or sharing has been explored and proven to be impractical;*
- iv. in the case of structures on the highway (including equipment cabinets and other ancillary equipment), they do not result in clutter, cause an obstruction on the highway or block visibility splays – a minimum footway width of 2 metres should be maintained in all but exceptional circumstances;*
- v. obsolete/surplus equipment is removed and the building or land is restored; and*
- vi. it can be demonstrated that the equipment will not cause interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.'*

It is noted that the LPA are supportive of the provision of high quality digital infrastructure and it has already been outlined within this section that the development is compliant with policy SI 6 of the London Plan.

In regard to point i, the host building is removed from heritage assets aside from the Grade II Listed Following the Leader Memorial. It has been demonstrated within this document, particularly within Heritage Statement section, that the proposal will not have a negative impact upon this heritage asset or any other heritage assets within the wider area. The design and siting of the proposal has been specifically chosen to reduce visual impact as far as technically possible, by utilising as minimal a design as technically possible and siting the apparatus upon an existing building, which benefits from being immediately adjacent to a large 13 storey building which will soften the impact of the apparatus and reducing any impact upon the surrounding skyline and conservation area.

In regard to point ii, the proposal is wholly ICNIRP compliant and a certificate of ICNIRP compliance is included within the application submission.

In regard to point iii, the development entails utilising an existing building which will support two operators.

Points iv and v are not relevant to this proposal.

Finally, in regard point vi, it is confirmed that the site is not located within the safeguarding zone for any nearby airfields and as such there will be no interference.

For the reasons set out above, it is considered that the proposal is fully compliant with Policy T9.

Policy T9 is the only dedicated in relation to telecommunications development, however, there are other relevant policies within the local plan detailed as follows:

**Policy Q2 Amenity** details the criteria new development is required to adhere to in relation to protecting amenity. Some of the criteria are not relevant to application proposal, however, it should be noted that due to the siting and minimal nature of the apparatus the development would not impact the daylight or sunlight of the host building, surrounding buildings or ground level spaces. There would be no excess noise from the apparatus, or pollution or odor. The apparatus will integrate into the existing landscape due to surrounding tall buildings and as previously stated within the policy section, GRP shrouding cannot be utilised for technical reasons, however, taking into account the sensitivity of the area, as minimal design as technical possible is proposed.

**Policies Q5 Local Distinctiveness** and **Q6 Urban Design: Public Realm** are both relevant as they relate to the impact development design has upon the character of an area. The application proposal will not detract from the distinctiveness of the area as this minimal design located at rooftop level will replace technologies for two operators whilst also bringing new 5G services to this densely populated area. It is well documented in preceeding sections that these technologies are vital to supporting home working as well as the businesses located within the area as and users of the bus routes and train services thus supporting tourism and in turn the local economy within this busy, vibrant part of London.

A Heritage Assessment has been undertaken within the accompanying Heritage Statement, which has demonstrated that any harm caused by the proposed installation is less than substantial and is greatly outweighed by the vast public benefits of the scheme. As such, it is considered that the proposal is wholly compliant with Policy Q22 Conservation Areas.

The siting and design of the proposed development has been addressed within the planning application. It is considered that all steps have been taken to minimise the visual impact of the proposal, with an innovative design and the technical solutions maximised by way of minimal amount of apparatus.

It is considered that the impact of the development would be acceptable and would be balanced by the benefits brought to the area, which directly and positively influence character.

As with any replacement network cell there is a clearly defined target area that is currently receiving network coverage and capacity for two Operators. The existing network coverage and capacity must be replicated, and improved upon, if possible, (in this instance, with a 5G-ready installation), or the result will be the creation of coverage gaps – where there were none previously.

There is a need for both Operators to improve services, including providing new 5G coverage. The proposal involves the use of the site by two Operators, which therefore assists in keeping the overall number of installations within the Council area neutral. It is considered that the public benefits of the proposal greatly outweigh any perceived negative, significant impact on any heritage asset. It is therefore expected that this application, and the changes made to the proposed development to reduce its visual impact, will receive Officer support.

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 the continued and enhanced provision of local community facilities and services.


## **Conclusion**

In summary, the application is in respect of electronic communications apparatus necessary to retain and improve existing public infrastructure networks.

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. The scale of works at this site are of such small scale that any disparity between the existing and proposed views is minimal, whether the viewpoints are from street level, neighbouring buildings or heritage assets.

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

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