AVISON YOUNG

PLANNING, DESIGN, ACCESS & HERITAGE STATEMENT

Site Ref:	59299	**Applicant:**	EE
NGRs:	**E:528892 / N:185373**	**Date:**	24 May 2024
Site Name:	Christ Apostolic Church	**Type:**	Full Planning Application
Site Address:	23 Highgate Road, Kentish Town London NW5 1JY		
Proposal:	The installation of 1 No. antenna behind replacement Glass reinforced Plastic GRP louvres, the replacement of 2 no. antennas, the installation of 1 No. GPS node externally mounted on the tower and ancillary development thereto		
Planning Agent:	Avison Young (UK) Limited		
LPA:	Camden Council		

AVISON YOUNG

Contents

Overview

Avison Young are planning consultants acting on behalf of NET to submit the application contained herein for proposed telecommunications development.

Enclosed you will find an application for Full Planning Permission and Listed Building Consent prepared on behalf of EE who is a licensed operator 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)
- Application Fee
- Drawings REF 1420509 _002, 100, 150, 200, 250,300,301B.
- Planning, Design, Access and Heritage Statement
- ICNIRP Certificate
- 5G and Future Technology
- IET Guide to 5G
- Connected Growth

We trust you will find the enclosed information sufficient to register and validate the application. Should you require any further information please direct your queries to the below contact.

Contact Details:
Rebecca Skerrett MRTPI Director, Technology rebecca.skerrett@avisonyoung.com | telecoms.planning.uk@avisonyoung.com 6th Floor, 11 York Street, Manchester M2 2AW

AVISON YOUNG

1. Introduction

1.1. Background

The following 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.

Church buildings have a special significance in the communities they serve and it is recognised that the mission and environment of every church and its many listed buildings have to be protected. Although the Church of England has a strict legal process for granting permission to change the fabric of a church building and this also applies to any telecommunications installations, this church is not part of the church of England portfolio and therefore does not benefit from Ecclesiastical exemption.

Church buildings often provide good solutions as they are normally one of the tallest structures in an area to provide the required heights for optimal signal propagation and the antennas can often be concealed within the structure to preserve the external appearance of the host building.

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.

As part of EE and H3G's ongoing network programme, there is a requirement for infrastructure improvements on this site.

1.2. Public Benefits

The proposed upgrade subject to this application is part of the operators' continuous efforts to improve existing mobile network infrastructure across the country. This aligns with the applicant's license obligation to ensure high quality mobile coverage is accessible to the general public, which benefits local residents, businesses and visitors in a variety of social and economic aspects.

In today's society the utility provisions for digital communications are an integral part of everyday life as it facilitates a variety of tasks such as phone calls, access to the internet, map navigation, video/music streaming, gaming, online banking and ecommerce. Virtual meetings can also be held with doctors, banking advisors, colleagues and other entities, which have proved necessary as a result of the global pandemic. Consequently, the proposal for telecommunications development submitted herein will contribute to the development and growth of the local area as part of the national strategy. In order to achieve these aims it is necessary for existing infrastructure network to be upgraded with the latest equipment and technologies to ensure the robustness of each base station. In some instances where there is a significant shortfall in the network the applicant will also explore opportunities for new sites to fulfil network requirements. This overall strategy allows for greater improvements to the service provided as it can:

1. Improve the size of coverage area targeted;
2. Increase signal strength which results in faster speeds; and
3. Maximises capacity to handle ever-increasing volumes of data traffic throughout the day.

Additionally, the proposal herein seeks to introduce the latest 5G technologies which forms part of the national rollout and accords with the UK Government directive to ensure 5G is more accessible at a nationwide level. 5G is an essential delivery that will open new opportunities as it creates innovation that can increase the value of local areas. The way in which mobile phones are used has changed over time as a variety of everyday tasks can now be actioned from a single handset and this extends to other forms of technology which require stronger and faster digital connectivity. For example, a paramedic can remotely consult with doctors in real-time when out in the field.

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. The consequences of the global pandemic also led to an increase in home-based working which highlighted the inadequacies of coverage provisions in non-urbanised areas where improvements are much needed. As part of the applicant's ongoing network programme, there is a requirement for infrastructure improvements in this area, which experiences a large volume of data traffic. The proposed works will also help towards futureproofing the network to reduce the frequency of works required at the site. Further technical justification can be found later in this statement.

A more specific public benefit that is associated with church-based telecoms sites is that it also provides an extra source of income for the church. Such funds can be utilised to aid local communities for those who need it, which is a contributing factor to the improvement and development of local communities as a whole.

1.3. Sustainability

Following COP26 there is a greater emphasis on considering the effects of future developments on sustainability and climate change. This is a material consideration for local planning authorities, and it is therefore essential to highlight the positive effects of telecommunications development on such environmental matters.

In relation to this, Mobile UK published a report entitled *Connectivity and Climate Change: How 5G will help lay the path to net zero*[1] released in October 2021. The report details a number of areas in which 5G technology will help to mitigate climate change as it supports key industries such as healthcare, manufacturing, agriculture, transport and energy to reduce their environmental footprints. 5G technology will allow energy production and energy use to be better monitored and planned; transport infrastructure will be smarter, meaning cleaner, shorter journeys; manufacturing production processes will be less wasteful; agricultural practices will minimise their negative environmental consequences; and healthcare services will be improved through the use of remote consultancy and other telemedicine innovations.

[1] https://www.mobileuk.org/news/cop26-landmark-report-highlights-how-5g-will-help-lay-the-path-to-net-zero

In a general sense, 5G will allow a greater efficiency in its own right when considering the consumption of energy and other resources. For example, one kilowatt-hour (kWh) of electricity is required to download 300 high-definition movies in 4G, but one kWh in 5G can download 5,000 ultra-high definition movies. The monitoring capabilities that digital communications can offer allow usage rates to be closely monitored, which in turn leads to more efficient planning to save energy and lower carbon emissions. A fast and strong digital connection is required to facilitate these means meaning the rollout of upgraded technology is necessary to continue the growth and development of areas locally and nationally.

Mobile operators are also making efforts to use renewable energy in their operations with a global ambition of reaching net zero emissions by 2050. Each individual code operator has set their own goals and business models for low carbon emissions to target innovative ways to reduce the dependency on fossil fuels. Such initiatives include adoption of zero carbon vehicles, increase the use of renewable energy, reduction of single-use plastic and other active engagement with suppliers and customers to reduce their overall footprint.

1.4. Site Selection

The applicant has adopted a sequential approach to site selection which is encouraged in the Code of Best Practice (2022) for mobile operators and National Planning Policy. Efforts have been made to utilise existing telecommunications sites wherever possible to prevent the unnecessary proliferation of base stations. In this instance an existing base station has been identified as requiring an upgrade meaning a new site was not needed to satisfy coverage objectives.

As mentioned previously, church towers provide suitable spaces for housing telecommunications apparatus as it provides an ideal height above the surrounding built form for the antennas to face towards the target coverage area, which is a functional necessity for equipment of this nature. Consequently, it is often the case that there is a lack of suitable alternatives in any given area whereby existing buildings are architecturally unsuitable or would result in an exposed base station that would be visible from the surrounding public realm. The concealed nature of the proposal submitted herein is an integral advantage of church-based telecoms sites. This is particularly apparent when compared to alternative site types such as ground-based masts that have a greater potential for visual impact, especially within areas of increased sensitivity such as the curtilage of a listed building or designated conservation areas. By contrast, church sites enable a more discreet design as the applicant endeavours to pursue internal installations wherever possible as a means of eliminating the potential visual impact on the aesthetics of church buildings and the surrounding area.

1.5. Application Site Details

Christ Apostolic Church is a Grade II listed building (former church of St John) and is not situated within designated Article 2(3) land. The church is located on the western side of Highgate Road, and is located to the north of O2 academy, there are a number of commercial, retail and residential properties in proximity. The existing base station is an integral site within the wider network as it serves a high volume of users in this area.

The details of the listing below are taken from Historic England –

AVISON YOUNG

Heritage Category:

Listed Building

Grade: II

List Entry Number: 1379013

Date first listed: 10-Jun-1954

Date of most recent amendment: 05-Dec-2008

Historic England states:

798-1/42/858 HIGHGATE ROAD 10-JUN-54 (West side) 23 CHRIST APOSTOLIC CHURCH (FORMER CHURCH OF ST JOHN) (Formerly listed as: HIGHGATE ROAD CHURCH OF ST JOHN, KENTISH TOWN)

II

CAMDEN

TQ2885SE HIGHGATE ROAD 798-1/42/858 (West side) 10/06/54 Church of St John, Kentish Town

GV II

Church. Built on the site of the Kentish Town Chapel by James Wyatt, 1783, of which only the nave walls and the heightened shallow western apse remain. The rest rebuilt and extended 1843-5 by JH Hakewill. Grey brick with carved stone dressings. Slate pitched roofs. EXTERIOR: north and south aisles with galleries (removed 1889), vestry and south porch, east end with twin stone spired towers with louvered Romanesque type belfry openings and lean-to porches decorated with heavy neo-Norman and thirteenth-century ornament. East facade buttressed with window of 3 round-arched lights separated by colonnettes; narrow round-arched window above and roundel in gable which has Lombard type frieze. Behind the porches, gable ends of side aisles with 2-light round-arched windows. INTERIOR: open nave with open timber tie-beam roof. 3 round-headed windows each side. 2 round-headed windows with rose above at apsidal west end. 3 neo-Norman arches separate nave from shallow, flat-ended chancel. Carved oak pulpit, pews with carved ends on choir platform, and nave pews intact. Late C19 alabaster font on stone base with elaborate openwork wooden cover suspended from pulley. Late C18 and early C19 wall monuments on both sides of the nave. Stained glass: mostly of the 1840s, including 'Baptism of Christ and Lazarus' by Wailes, 1845. In former south gallery, stained-glass window by Burne-Jones, 1862, depicting the 'Building of the Temple' in storage at St Benet's, Lupton Street in 1994. Monuments: many minor tablets. John Finch, d.1797, festooned sarcophagus, by Charles Regnant. Sarah Pepys, d.1806, south aisle, mourning woman by an urn. William Minshull, d.1836, with portrait profile by Chantrey. (Survey of London: Vol. XIX, Old St Pancras and Kentish Town: London: 54, 56 & 145-7).

Listing NGR: TQ2888485367

Legacy

Map of Listed Buildings in the surrounding area

Above is an extract from Historic England which illustrates the church in context. Listed buildings are denoted by the blue triangles. There are a number of Grade II listed buildings, The Forum, 1-7 Highgate Road and The Bull Public House, which are located to the south of the application site.

Whilst the application site is situated in proximity to listed buildings, the proposed equipment will be positioned internally and screened from view. Consequently, the application is capable of protecting the character and setting of this designation as there is little demonstrable impact caused as a result. Additionally, the proposal seeks to replace existing louvres with replicas made of a special material that allows radio signals to pass through. These replacement louvres will adopt a matching finish so as to imitate the existing louvres, which allows the visual change to be unrecognisable to the naked eye. This type of work has been undertaken on the other louvres where the existing antennas are located. This is of notable significance as the application is not considered to have a detrimental impact on the surrounding area or listed building and the public benefits the proposal will outweigh the negligible visual harm to the host building.

1.6. Relevant Planning History

2015/7044/L and 2015/7041/P - Replacement of the existing timber louvres with glass reinforced plastic, addition of handrail to existing timber ladders, installation of internal power cable, emergency bulkhead lighting, 4no equipment cabinets, 6no antennas behind louvres, repair of existing timber floor and addition of a new hatch and associated repairs. Approved.

2. Design

2.1. The Proposal

The application seeks to upgrade the existing site which comprises the installation of 1 No. antenna behind replacement Glass reinforced Plastic GRP louvres, the replacement of 2 no. antennas, the installation of 1 No. GPS node externally mounted on the tower and ancillary development thereto.

In order to provide improved mobile coverage to satisfy current and future network demands in this area it is necessary to provide improved coverage due to the high footfall in this area. The antennas subject to this application will be situated internally behind GRP that allows radio signals to pass through without affecting its strength and quality. This enables the equipment to remain hidden from view. There are existing louvres currently in situ and therefore the proposed replacement louvres will be coloured and moulded to an exact match so as to maintain the appearance as a whole. This will aid in concealing the antennas and steelwork that will be housed internally and will be the same as the works which have previously been under taken on this site.

The proposed GPS node takes a minimal profile and will be positioned on the tower close to the window and will not be overly visible and will be screened from some view points by the church roof.

The works will be carried out by specialist crafts people to ensure that the fabric and integrity of the building is not harmed.

The works necessitate a full planning application and listed building consent due to the fact that there are louvres being replaced on the building.

2.2. Design Considerations

The applicant has sought to cause as little impact as possible to the fabric and architectural qualities of the listed building in addition to the character and setting of the surrounding area. Efforts have been made to preserve existing visual and residential amenity in the surrounding area whilst also ensuring the technical objectives of the site remain achievable. 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 offset that the least amount of equipment and the smallest scale possible has been proposed in pursuit of the least impactful design that can achieve the required objectives.

The site selection process has been outlined earlier in this statement however, it is important to reiterate the suitability of this application site and its ability to conceal telecommunications equipment which is of significant visual benefit. In accordance with Government Guidance an existing base station has been selected for the proposed development. The existing site was deemed acceptable by the LPA in its inception meaning that no concerns were raised by the local planning authority in relation to its location within a listed building and the wider area. Though it is recognised that changes to a telecommunications site will to a degree affect the current context in situ, such effects do not always result in significant detrimental harm as each site must be assessed on its own merits and balanced against the public benefits to be provided in accordance with national planning policy. In this respect significant weight should be given to improving existing 4G coverage and introducing 5G technologies in recognition of the government's commitment to this rollout, which will result in socioeconomic improvements for the local community. Digital connectivity is an essential utility provider in today's society and a high-quality

service must be provided by the operators in accordance with license obligations. Within the local area, the application site is an established base station, which sets precedence for telecommunications development in principle at this location.

The church tower is a focal point in the area and the proposed scheme does not alter the skyline due the antennas being positioned internally.

Views of the church from the surrounding public realm

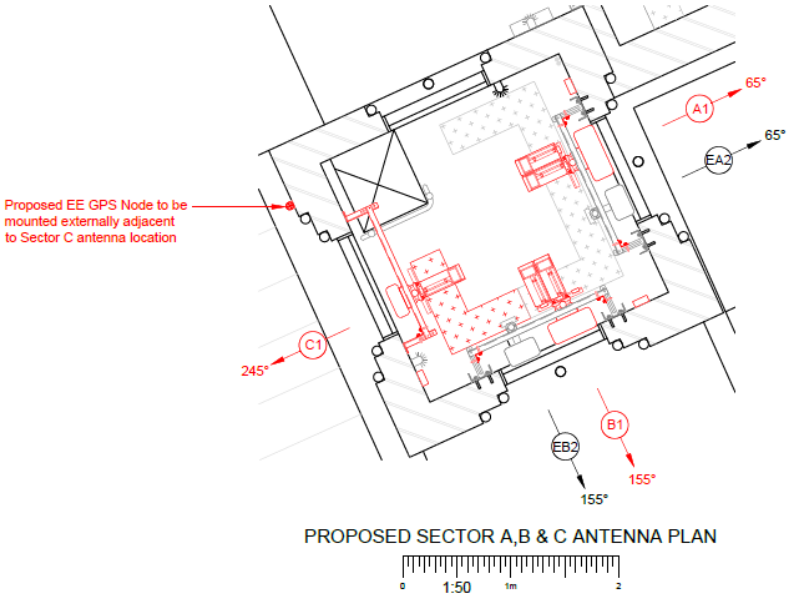
The church when viewed from Highgate Road.

The church when viewed from Highgate Road looking north west.

Antennas

The proposed design is to install the antenna within the church tower and replace the louvres with GRP which will allow the signal to transmit. The louvres in the other windows where antennas are located have been replaced and are indistinguishable to the original.

Below is a plan view of the tower which illustrates the position of the antennas where the existing louvres have been replaced and where the proposed replacement louvres are located.



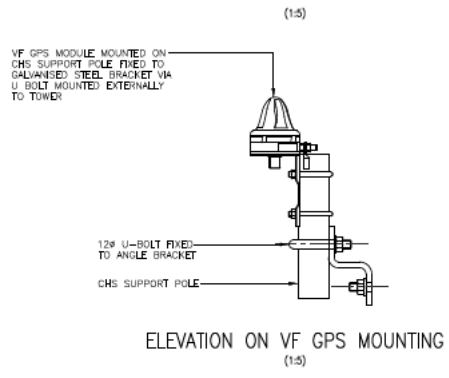
Antenna A1 and B1 are replacement antennas and are located behind replacement louvres, antenna C1 is the new antenna which requires the replacement louvres. The louvres are made of timber and will be replaced with GRP to exactly match the existing.

Below are examples of GRP timber look louvres.

Above is a close up of GRP moulded and coloured to look like timber.

GPS Node

The GPS module is very small in scale measuring, 68mm high and 98.5mm deep. As shown in the details below.



The GPS module is required for TDD (Time Division Duplex) technologies specifically in relation to providing 4G and 5G coverage, so it is an essential element of the proposed equipment.

The Node will be positioned adjacent to the louvered windows on the western elevation it has to be located externally to have a clear line of sight to the sky to receive satellite information. As detailed above the node is small in scale and will be screened by the adjacent roof line when viewed from the north north west looking north north east.

AVISON YOUNG

Conclusion

There are minimal external elements to this proposal meaning the appearance of the listed building will not be noticeably altered. Visually there will be very little change to the application site as a result of the proposal as the antennas are located internally within the church tower. The GRP louvres will match the existing louvres to retain the external appearance and the node ios small in scale being approximately the size of a tennis ball.

In summary the proposed design is considered to be respectful of the surrounding elements and does not cause detrimental harm to the visual amenity of the immediate environment. The siting and appearance of this proposal is suitable and is in line with national planning policy to utilise existing sites and buildings. Therefore, the applicant strongly believes the scheme demonstrates a sympathetic design that would not detract from the setting and character of the surrounding area and the proposed works are capable of being absorbed into the wider landscape.

AVISON YOUNG

3. Planning Policy Considerations

Development Plan Policy 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.

3.1. 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.

Camden Council's Local Plan was adopted on 3rd July 2017. It contains the following policies which are relevant in the determination of this application. Policy E1 – Economic Development, D1 Design, D2 heritage.

In relation to Policy E1 – Economic Development, the proposal is to upgrade an existing site to provide improved coverage in an area which has a high footfall. This proposal is therefore in compliance with this policy and can contribute to economic development in the area, and also complies with the spirit of the NPPF. The proposal complies specifically with **Part h** of the policy by allowing for the provision of high speed digital infrastructure.

The code of best practice for mobile network development 2016 in paragraph 5.4 states:

"In terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5 percentage points in the Gross Domestic Product per capita, while another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade".

This site will promote economic development in this area as it will improve connectivity.

In relation to **Policy D1 – Design**, the site has been sensitively designed with the majority of the equipment being located internally within the church. The only external element is the GPS module which is small in scale and is located more than 14 metres above ground level.

The changes proposed are very minor it is considered that the works are negligible given the public and economic benefit that the good telecommunications network will provide in this busy area of London.

Policy D2 – Heritage promotes the preservation and enhancement of the conservation area and listed buildings. In relation to this policy, it is not considered that the swap out of the louvres for GRP will have a detrimental impact on the heritage of the church.

The proposed GPS module is small in scale and will not be overly visible. There is no harm caused to the historic building as the works will be carried out by specialists who have a track record of working with Historic England and listed buildings. The LPA have previously allowed similar works to the church.

The revenue from the installation will be paid directly to the church which can be reinvested in the building to ensure that community facilities are protected and enhanced in Local Centres.

It is therefore considered that the proposal complies with Local Plan Policy.

Digital Camden
The Digital Camden document sets out Camden Council's aims and objectives with regards to the delivery of digital infrastructure in the area. This site will allow for a sufficient level of coverage to be provided within the area by improving coverage, which in turn will allow for better access to mobile technology.

3.2. National Planning Policy

The National Planning Policy Framework was revised in July 2021. 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 which is expected to be delivered and upgraded over time.

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. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. 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 unnecessary proliferation of masts. In this instance an existing base station has been identified for an upgrade scheme which negates the need to explore new locations. This proposal seeks to provide 4G and 5G coverage whereby a network evolves around existing sites and one site links with another. If an existing site cannot be upgraded or is unable to provide coverage to an area, then an alternative site within proximity would be required.

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, or within close proximity of any schools or colleges. 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.

Paragraph 118 - *"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."*

Section 12 – Achieving well-designed places

Paragraph 126 – *"The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. 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 is designed to be respectful to the character and setting of the surrounding area. The proposal is of a high quality design that utilises an existing building which will also result in negligible visual impact on the both the building and surrounding landscape.

Section 16 – Conserving and enhancing the historic environment

Paragraph 194 – *"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."*

Paragraph 201 – *"Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss…"*

Paragraph 202 – *"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 these paragraphs as the application has been designed sensitively to be respectful of the identified heritage assets. Considerable efforts have been made to ensure the least amount of potential impact is imposed when balanced against technical constraints and the advancement of digital connectivity carries significant weight when considering the public benefits to be provided. Mobile operators are obligated to provide high

quality connectivity across the country as a licensed utility provider in which sensitive heritage assets and land designations are often unavoidable circumstances to ensure high quality coverage can be provided to all areas of the country.

3.3. Code of Best Practice for Wireless Network Development in England 2022

The Code of Best Practice is a guidance document created by the Department for Digital, Culture, Media and Sport, which aims to support the government's objective of delivering high quality wireless infrastructure whilst balancing the needs of environmental considerations. This document has been developed in collaboration with mobile network representatives, other government departments, public bodies, local planning authorities and protected landscapes. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The guidance aligns the agreed principles between operators and local planning authorities in respect to the siting and design of network infrastructure to outline the roles and responsibilities of both parties throughout the application process. Within this document it is recognised that digital connectivity is vital to enable people to stay connected and businesses to grow, and there is particular emphasis on the 5G rollout and future mobile generations, which will be vital for a range of uses and future smart city applications. Much of the principles in this guidance reflect those already highlighted in the NPPF however, there are notable excerpts to highlight for the council's considerations in the determination of this application.

With reference to Paragraph 19, the local planning authority is *"encouraged to support the deployment of digital infrastructure by:*

- *Incentivising connectivity: support the expansion of telecommunications networks, and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.*
- *Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.*
- *Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.*
- *Information and communication: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives)."*

When considering the siting and design of any given proposal, Paragraph 22 states, *"The choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible."*

Moreover, Paragraph 29 states, *"There are factors that can affect the type of infrastructure that will be deployed… including location and the coverage and capacity requirements. Planning authorities should be aware of these constraints when considering proposals. In particular:*

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.*
- *In rural areas, base stations often need to cover wider geographic areas. Operators may need to use tall masts or lattice towers to provide the required coverage. The location of masts can sometimes be dictated by access to transmission links back to the operator's main network and proximity to a power supply. Coverage in some areas can be limited because of the geography, topography and terrain."*

The guidance also provides further explanations for technical and operational considerations as below:

Paragraph 64 – *"All wireless network installations are principally guided by the technical need for the site and the technical constraints placed upon transmitting a signal. The siting and design of such installations must therefore be balanced between visual impact and these needs and constraints. As set out in the siting and design section above, the three primary technical and operational considerations for installation sites are: ensuring that wireless infrastructure provides an appropriate level of coverage over the intended geographical area; ensuring that sites have sufficient capacity to meet user demand; and, requiring a connection to the wider network 'backhaul'."*

Paragraph 65 – *"Planning authorities should take account of these constraints, and those set out below, on network deployment and siting and design, when considering proposals."*

3.4. The 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.

3.5. Other Notable Reports and Reviews

The following reports highlight the importance of 5G technology. The recent pandemic has also shown an increased reliance on connected services due to the need for home-working and home-schooling, which is likely to continue in the post-pandemic era to an extent. It is therefore essential for mobile network operators to provide a reliable and resilient service to facilitate these needs,

as evidenced in their significant contributions in the global response to the pandemic. Staying connected has become a defining feature of the modern economy and a significant trend of the 21st Century. Therefore, 5G will prove fundamental to fulfilling the potential of digital connectivity and will help drive the economy after the COVID-19 outbreak. For example, within the healthcare sector, hospitals and medical experts will have the ability to connect in real-time with their patients to diagnose and treat disease at the first point of contact to improve patient care. In terms of commercial benefits, manufacturers will look to leverage robotics, artificial intelligence (AI) and superfast connectivity to enable the remote management of production lines and to support the faster reconfiguration of factories.

Connected Nations 2023
The highlights from this report are:

- 4G mobile network coverage is broadly available. Coverage for data services from at least one operator reaches 98% of England's landmass and 4G continues to carry the majority of mobile data traffic (accounting for 81% of total data traffic in the UK).

- The availability of 5G services is growing rapidly. In England, the percentage of premises that can now receive 5G outdoor coverage from at least one operator ranges from 87% at the Very High Confidence level to 94% at the High Confidence level.1 This constitutes 17 and 13 percentage point increases respectively, demonstrating the pace of rollout over the last year.

This proposal will provide coverage in a high footfall area.

Connected Nations 5G Performance 2021
5G rollout has continued at pace with the number of mobile base stations providing 5G services more than doubling over 2020 to over 6,500 sites across the UK. 87% of these are in England, 8% in Scotland, 3% in Wales and 2% Northern Ireland. It is estimated that 5G is available from at least one mobile network operator (MNO) outside 42-57% of premises. The four Mobile Network Operators (MNOs) – EE, O2, Three and Vodafone – each estimate they provide 4G outdoor coverage to circa 99% of premises. Networks' coverage of the UK landmass ranges from around 79% to around 86%. There has been some incremental progress in increasing coverage across each of the UK Nations by the MNOs, including 46 fresh deployments towards their Shared Rural Network commitments. Networks have continued to perform well despite significant demands as people and businesses relied on their phone and broadband connections during national lockdowns because of the pandemic. Average monthly data usage on fixed networks has increased to 453GB, from 429GB in 2020 and from 315GB in 2019. Whilst peak usage remains in the evening, networks continued to see high demand during the day due to increased home-working circumstances.

This application site is located within a vital area where network provisions must be enhanced to allow people to work at home, to allow schools to teach online and to enable better accessibility in all parts of the country, which will in turn relieve pressures for home-working and e-learning.

Government Joint Statements from DCMS and MHCLG
The Government is highly aware that 5G is vitally important for the United Kingdom. To enable this to happen the permitted development rights [in England] were reviewed to enable faster 5G rollout (NB: a legislation amendment came into force on 4th April 2022). Permitted development

rights for electronic communications infrastructure are a critical element in the planning regime for streamlined and cost-effective deployment of telecommunications infrastructure. They benefit both mobile network operators and local planning authorities in the effective management of limited time and resources. Permitted development rights also facilitate investment in network infrastructure resulting in improved service to customers and help in delivering significant socioeconomic benefits to society both nationally and locally**.** Reforms to planning laws will mean fewer phone masts will be needed overall to level up the country with improved 4G and 5G mobile coverage as telecoms firms will be able to upgrade existing infrastructure in the first instance before needing to build new masts.

Digital Infrastructure Minister Julia Lopez said, *"We've all felt the frustration of having the 'no bar blues' when struggling to get a phone signal, so we're changing the law to wipe out mobile 'not spots' and dial up the roll out of next-generation 5G."*

This proposal is to provide 5G and is critical in the Government's long-term strategy.

Queen's Speech May 2021
The Queen's Speech announced that the Government will strengthen national infrastructure proposals to extend 5G mobile coverage and high-speed broadband in the Product Security and Telecommunications Infrastructure Bill, which includes new legal duties on telecoms firms to increase security across the UK networks. The Speech went onto say, *"My Government's priority is to deliver a national recovery from the pandemic that makes the United Kingdom healthier and more prosperous than before."*
This proposal therefore will help the country's economy.

Digital Nations Ministers
Chris Philp MP is tasked with meeting the Government's target for the whole of the UK to have access to gigabit–speed broadband connectivity by 2025 and majority 5G coverage by 2027. This proposal will aid in securing this target.

The Digital Nations Ministers met virtually on 18th November 2021 to discuss the digital government agenda. It stated, *"The global pandemic has proven beyond doubt that digital technologies play a crucial role in allowing our governments to meet the needs of our citizens whether in relation to delivering healthcare, social support, information, or education. We affirm our shared commitment to using digital technology to build back better. Acknowledging the continued impact of the COVID-19 pandemic on our societies, we discussed the opportunities digital innovation offers in tackling these, and other emerging challenges, including climate change, and exclusion and inequalities. As digital governments in open societies, we share a commitment to promoting inclusion, sustainability, and our shared values. We reaffirm our shared aim to work together to accelerate our digital transformation and become more proactive, responsive, and resilient digital governments. Working together, our governments will continue to use technology to break down barriers between government and people, and to embrace innovative digital solutions that deliver real-world impact."*

The statement looked at 3 key themes:

1. Sustainable Innovation – Technological advances, such as in the use of big data and artificial intelligence, offer ground-breaking opportunities for governments and the international community to tackle our most pressing challenges, including climate change.

As sustainable digital governments, we affirm a shared commitment to making better use of data, digital tools, and technologies to reduce the environmental impacts of our government's own operations, and to strive to address the sustainability considerations of digital activities.

2. Inclusive Innovation – We remain committed to putting people at the centre of digital transformation. We will continue to deliver inclusive policies that narrow the digital divides: this includes widening access to the Internet and to digital tools and technologies, enhancing our digital infrastructure to reach underserved communities, building digital skills and digital confidence, and designing for accessibility. We recognise our responsibility to ensure no individual is left behind as we accelerate the digital transformation of our governments.

3. Values-Driven Innovation – We believe that public trust in the digital services and tools we develop and deploy are paramount to their successful adoption. As leading digital governments in open societies, we recognise that accelerating digital transformation must therefore be guided by our shared values. We affirm our shared commitment to putting in place the right safeguards, including for human rights, data protection, data ethics, and to promoting transparency and public confidence in public sector use of data and digital technologies.

This clearly shows that digital connectivity is high on the Government agenda and this proposal aids in providing the UK with high-quality connectivity.

Councils and Connectivity 2 – A report by Building Mobile Britain and Mobile UK, May 2019
"Mobile operators have ambitious plans to further enhance their networks and will soon be starting initial commercial rollout of 5G, the next generation in mobile technology. This ambition matches the Government's objective for the UK being a world leading digitally connected economy. However, mobile operators cannot achieve this objective alone – action is needed by all stakeholders, including national and local government. It is vitally important that residents and businesses can access 5G in the future. It promises to radically transform our economy and society for the better…it is vital that councils attempt to understand why good quality mobile connectivity will become more important, and what they need to do to ensure that local residents and businesses have access to the best possible mobile connectivity in the future."

A Councillor's Guide to Digital Connectivity – published by the Local Government Association, September 2019
"With better access to high speed and reliable broadband and mobile connections, local communities can access public services more conveniently and purchase goods online at a lower cost. People can work from home, cutting out their commute and improving their quality of life. Businesses can grow, become more productive, sell their products in a global market and access a raft of services not available to those offline. Tourists can find out more information about local attractions and share photographs of their experiences with friends and on social media. In contrast, areas stuck in the digital slow lane are less attractive places to live, work and visit, and risk being left behind as other areas reap the benefits of our digital revolution.

5G will enable exciting new services and applications including:

- *faster mobile broadband and a more consistent experience in congested areas with a very high number of devices*
- *industrial applications, enabling businesses to improve their productivity, for example through predictive maintenance and real-time analytics*
- *Internet of Things (IoT) services, many of which will help councils and businesses deliver services more efficiently including:*
- *transport and logistics: connected parcels and fleet tracking*
- *health and social care*
- *environmental monitoring: sensors monitoring air quality and water pollution in real-time*
- *smart agriculture and smart animal farming, smart retailing*
- *connected and autonomous cars: allowing cars to communicate with each other, o other road users and even the road infrastructure."*

Future Telecoms Infrastructure Review – Published by DCMS, July 2018
"When looking at the speed, resilience and reliability that consumers want and businesses need in order to grow, it is clear that full fibre and 5G are the long-term answer. These technologies have the potential to transform productivity, and to open up new business models. Full fibre networks are faster, more reliable, and more affordable to operate than their copper predecessors. 5G will deliver faster and better mobile broadband, and enable revolutionary uses in industry sectors like manufacturing, health and transport alongside finishing the roll out of 4G networks to meet existing mobile demand, we want the UK to be a world leader in 5G to take early advantage of this new technology. We have set a target that the majority of the population will have 5G coverage by 2027 the technical capabilities and performance characteristics of 5G are clear. 5G is expected to deliver faster and better mobile broadband services to consumers and businesses, and to enable innovative new services for industry sectors, including manufacturing, transport, immersive technologies and healthcare."

Statement of Strategic Priorities for Telecommunications, The Management of Radio Spectrum, and Postal Services – updated version published by DCMS October 2019
"The Government is committed to providing the UK with world-class digital connectivity that is gigabit-capable, reliable, secure and widely available across the UK. We want the nationwide deployment of gigabit-capable broadband networks at pace. Alongside improving 4G coverage to meet existing mobile demand, the Government wants the UK to be a world leader in 5G, and for the majority of the population to have 5G coverage by 2027. 5G is expected to deliver faster and better mobile broadband services to customers and businesses, and to enable new services for industry sectors, including manufacturing, logistics and immersive technologies. 5G creates an opportunity for market expansion - in the type of wireless services available and in the number of providers of networks and services. The Government's view is that there would be strategic advantages in a model that maintains the benefits of network competition between multiple mobile network operators, while enabling new solutions to connectivity challenges, including in-building coverage, rural coverage and industrial applications."

The above statement highlights the importance of rolling out a 5G network and this application will futureproof the site for the foreseeable future and ensure that the local community has access to high-quality connectivity. In a broader perspective this will help to eliminate areas of no, or poor, coverage. High-quality connectivity is seen by the Government as the way to economic recovery and the public benefit of such infrastructure outweighs any minimal harm to the area.

In summary, it is our opinion that the proposal meets all local and national policy requirements.

AVISON YOUNG

4. 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.

The consequences of the global pandemic have also highlighted the inadequate nature of infrastructure in suburban and rural areas in particular as a result of increased home-working and e-learning for school. Existing base stations have struggled to handle increased data traffic demands which demonstrates the importance of improving digital connectivity in all parts of the country. In addition to improving signal strength, speed and capacity for current demands the proposed works will also aid in futureproofing the quality of the network through its greater robustness. As a licensed code operator, the applicant has a legal obligation to ensure a high-quality service is accessible to the public throughout the UK as it contributes positively towards the socioeconomic development at local and national levels. This is particularly apparent in densely populated areas that experience high levels of footfall on a daily basis.

The demand and focus on delivering the 5th generation of mobile phone technology is the primary objective of licensed operators in the UK as part of the national rollout. 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. 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.

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.

4.1. Coverage

The licence granted to licensed code operators 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.

4.2. 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 national policy which seeks to develop and grow connected environments.

4.3. 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/music streaming. For instance, 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.

4.4. 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 antennas must reach a sufficient height above surrounding buildings and trees. In more rural locations the undulating topographies will also have detrimental implications on signal propagation which require mitigation. The proposed development must also be in a position to provide strong radio coverage to the target area that can also be received inside buildings. As a result, it is integral that antennas have an unobstructed view towards the wider target area as it optimises the quality of signal.

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.

4.5. Health and Safety

There are approximately 1400 peer-reviewed publications on the biological and health effects of radiofrequency (RF) signals, which are used in mobile communication technology. The scientific community have collated, summarised and assessed these publications in research reviews with the most influential in the UK being the Stewart Report (*Mobile Phones and Health*) by the Independent Expert Group on Mobile Phones under the chairmanship of Professor Sir William Stewart. These research reviews are used by Governments to develop policy on exposure to radio frequency signals.

Published in May 2000, the Stewart Report concluded that the balance of evidence did not suggest that exposures to radio frequency fields below international guidelines could cause adverse health effects, although it acknowledged that biological effects might occur below these values. The report stressed, however, that a biological effect does not necessarily mean a negative impact on health. Walking, drinking a glass of water or listening to music all produce biological effects.

Since 2000, over 30 further reviews have been carried out, carefully considering many hundreds of pieces of research. Most have made similar recommendations and have come to similar

conclusions: that research should continue to address any gaps in the knowledge; and that overall, the possibility of adverse health effects from mobile communications remains unproven.

Further, the reviews stress that exposures from base stations (or masts) are, in the words of the National Radiological Protection Board (now part of Public Health England), *"extremely unlikely to cause any effects on biophysical grounds."* [*A Summary of Recent Reports on Mobile Phones and Health* (2000-2004), NRPB, Jan 2005].

In June 2011 the World Health Organisation (WHO) noted that *"A large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have been established as being caused by mobile phone use"* [*WHO Factsheet 193: Electromagnetic Fields and Public Health: Mobile Telephones*]. In April 2012, the Independent Advisory Group on Non-ionising Radiation (AGNIR) published a report entitled *Health Effects from Radiofrequency Electromagnetic Fields*. This report concluded that there is no convincing evidence that mobile phone technologies cause adverse effects on human health. AGNIR also found that although a substantial amount of research has been conducted, there is no convincing evidence that RF field exposure below the internationally agreed guideline levels applied in the UK causes health effects in adults or children.

In addition, the International Commission on Non-Ionizing Radiation Protection reviewed its guidelines in 2009 and concluded *"ICNIRP reconfirms the 1998 basic restrictions in the frequency range 100 kHz–300 GHz until further notice."* [ICNIRP statement on the *Guidelines for limiting exposure to time-varying electric, magnetic and electromagnetic fields (up to 300 GHz)*].

Research reviews are used by guideline setting bodies and Governments to develop advice and public policy on exposure to the signal used by mobile communications technology.

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.

AVISON YOUNG

5. 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. It was therefore not required to explore alternative sites in line with National Planning Policy. In today's society there is a strong reliance on connected services which demonstrates a necessity for high-speed coverage in all areas of the UK. The effects of the global pandemic have also led to increased home-working where current network infrastructure is in much need of improvement.

The proposed works have been designed sensitively in consideration for the character and appearance of the listed building and the surrounding area in which the least impactful scheme has been proposed to minimise any detrimental impact whilst also ensuring the coverage objectives can still be achieved.

The applicant has also demonstrated efforts to respect the existing visual amenity of the surrounding area as the hidden nature of the proposal allows the external appearance of the listed building to be preserved. This follows a sequential approach to site selection as an existing building has been utilised to house a discreet design that will provide significant public benefits as a result. It is therefore considered that the public benefits provided by this site outweigh the minimal visual change in the appearance of the host building. Additionally, the proposed works will be carried out by specialist to ensure that the host building is not damaged.

The site will be valuable in the Government's desire for high-speed connectivity and ensuring its accessibility throughout the UK wherever and whenever required. It is considered that the proposal complies with national and local policy. It is therefore considered that the public benefits provided by the proposed upgrade would outweigh the minimal visual change in the appearance of this site.

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