

Our ref. 14078/ATAP

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Chief Planning Officer
London Borough of Lewisham
Laurence House
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Submitted via the Planning Portal

Dear Sir or Madam,

PLANNING APPLICATION FOR THE UPGRADE OF AN EXISTING TELECOMMUNICATIONS SITE, COMPRISING THE REMOVAL AND REPLACEMENT OF THE EXISTING 5 METRE HIGH STUB TOWER AND 3NO. ANTENNAS WITH A 7.5 METRE HIGH STUB LATTICE TOWER AND 12NO. ANTENNAS, THE RELOCATION OF 2NO. EXISTING 0.6 METRE DIAMETER DISHES TO BE LOCATED ON THE NEW TOWER, THE INSTALLATION OF 8NO. EQUIPMENT CABINETS LOCATED ON THE ROOFTOP, AND ANCILLARY DEVELOPMENT THERETO, AT 1-49 GRAYSTEAD ROAD, FOREST HILL, LEWISHAM, LONDON, SE23 3AJ

We are planning consultants retained by MBNL to submit planning applications on their behalf. This proposal is for the upgrade of the existing EE Limited and Hutchison 3G (H3G) UK Limited site.

Enclosed you will find a full planning application prepared on behalf of MBNL (EE Limited & H3G UK Limited). EE & H3G have been licensed to provide a Cellular Network based upon the Global System for Mobile (GSM) standard and Universal Mobile Telecommunications System (UMTS) within the United Kingdom.

The development consists of:

"The removal and replacement of the existing 5 metre high stub tower and 3No. antennas with a 7.5 metre high stub lattice tower and 12No. antennas, the relocation of 2No. existing 0.6 metre diameter dishes to be located on the new tower, the installation of 8No. equipment cabinets located on the rooftop, and ancillary development thereto."

Enclosed is the following:

- Drawings no. LSM075 – 002, 100, 150, 215, 265 – B
- Application forms
- Planning & Heritage Statement (including design and access statement)

- ICNIRP certificate
- 5G and Future Technology document
- Letter from Margot James MP and Rishi Sunak MP regarding Local Authority support for 5G rollout

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

We trust you will find the enclosed information sufficient to register and validate the application. If however you require any further information, please contact Victoria Parsons on 0161 956 4123 or Victoria.parsons@avisonyoung.com.

Yours sincerely,

A handwritten signature in black ink that reads "GVA Grimley". The signature is written in a cursive, flowing style.

GVA Grimley Ltd.
International Property Advisors

1. DESIGN AND ACCESS STATEMENT

The following design and access statement is enclosed in support of this proposal. The statement links the general development principles to the final detailed design.

1.0. HISTORY & BACKGROUND

EE 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, EE 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, EE were 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.

This application upgrades the existing equipment.

1.1. DESIGN

1.1.1. The proposal

The proposal is for the upgrade of the existing telecommunications site at 1 – 49 Graystead Road, Forest Hill, Lewisham, London, SE23 3AJ. The proposed work comprises the removal and replacement of the existing 5 metre high stub tower and 3No. antennas with a 7.5 metre high stub lattice tower and 12No. antennas, the relocation of 2No. existing 0.6 metre diameter dishes to be located on the new tower, the installation of 8No. equipment cabinets located on the rooftop, and ancillary development thereto.

As the proposal is for the installation of replacement apparatus which will exceed the highest part of the building by more than 8 metres, a full planning application is required.

1.1.2. Design Considerations

The proposed upgrade utilises an existing site where possible. The operator has identified a requirement in this area to upgrade the equipment in order to introduce 5G coverage and improve capacity.

The proposed 12 upgraded antennas will be located on a new 7.5 metre high rooftop lattice tower, which is necessary as the existing 5 metre high rooftop monopole is unable to support the increased size of the antennas. It is necessary to increase the height of the apparatus due to ICNIRP compliance.

The site is located on top of a residential building on Graystead Road. The site is located in a predominantly residential area. It is important to upgrade the existing site in this location to ensure that 5G coverage and increased capacity is provided to nearby residents and businesses.

It is not considered that the proposed works will have a detrimental impact on the host building or surrounding area as the proposal is for the upgrade of an existing established rooftop site, which has been apparent on the rooftop since its installation. The scheme proposes the minimum amount of equipment required to allow for the

upgrade of the site.

It is not considered that the proposal will have a detrimental impact on the area, and permission should not be withheld.

1.1.3. Planning Policy Considerations

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

1.1.4. Local Policy

The Lewisham Core Strategy

The Lewisham Core Strategy was adopted by the Council in June 2011 and sets out the key planning policies for the Borough. It contains **Policy 15 – High quality design for Lewisham** which is relevant in the determination of this application.

In relation to this policy, the proposal is for the upgrade of an existing telecommunications site. The overall height and width of the apparatus will be increased slightly to allow for the larger 5G antennas to be supported. The visual impact of the proposal has been minimised so far as practicable, the height has been kept to a minimum and the equipment is sited centrally on the rooftop to aid in minimising its appearance, particularly when viewed from ground level.

The Lewisham Development Management Local Plan

The Lewisham Development Management Local Plan document was adopted by the Council in November 2014 and contains the following policies which are relevant in the determination of this application.

Policy DM39 – Radio and telecommunications masts and infrastructure

In relation to 3a, the proposal is for the upgrade of an existing telecommunications site which utilises an existing building. It is required to replace the existing rooftop structure with a slightly taller, wider structure to allow for the installation of the larger antennas to support the introduction of 5G coverage to the area. An ICNIRP certificate is submitted alongside this application to confirm that the proposal complies with international guidelines. In relation to 3b, a lattice style rooftop structure has been chosen as it allows for the installation of the larger antennas but also allows views through the site, rather than creating an opaque block on the skyline. Due to the topography of the area and the height of the building, the site will be visible in long views of the site and from surrounding residential areas. However, to reiterate, the proposal is for the upgrade of an existing rooftop telecommunications site which is already an established feature. The upgrade of the existing site is in line with both local and national planning policy and restricts the need for an additional site in the area to provide the required additional capacity and 5G coverage. In relation to 3c, consultation was carried out with Councillor Leo Gibbons, Peter Bernards, Sophie Davis, Fairlawn Primary School Headteacher and Chair of School Governors, Saint Francesca Cabrini Primary School Headteacher and Chair of School Governors, Honor Oak Preschool, and the Local Planning Authority. The Local Planning Authority responded to request a fee of £900 for pre-application, which we did not proceed with as it was cost prohibitive. No further responses were received.

London Plan

The current 2016 Plan is still the adopted Development Plan, but the Draft London Plan is considered to be a material consideration in planning decisions and holds limited weight in the determination of applications.

The 2016 Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks that London requires to secure its long – term economic growth.

The Draft London Plan contains Paragraph 1.0.8 which states “Planning for a ‘smarter’ city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners.” The equipment provides digital connectivity which is of a public benefit to both Londoners and visitors to the area.

Paragraph 1.4.11 states “The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processed, opening up new markets and allowing more flexible working.” The upgraded site will ensure that the level of connectivity in the area is sufficient to meet the rising demand of reliable data and digital services by the public.

Policy SI6 – Digital connectivity infrastructure is split into 4 parts. In relation to the proposed upgrade:

3A) The upgrade will ensure that there will be no reduction in mobile connectivity in the surrounding area as the existing level of capacity will be improved.

4) The proposal supports the effective use of an existing building to accommodate well-designed mobile digital infrastructure.

The site will be an integral element in securing the Mayor’s vision for the delivery of modern communications networks across London.

London Infrastructure Plan 2050 – Update

Chapter 8 – Digital connectivity states that digital connectivity is vital and essential for businesses and citizens to take part in modern society. The upgrade of the existing site will allow for a sufficient level of connectivity to be achieved within the area, thus keeping businesses and citizens at a technological advantage.

National Infrastructure Commission Report – Connected Future

The National Infrastructure Commission (NIC) was asked to advise government on the steps the UK should take in order to become a world leader in the deployment of 5G mobile telecommunications networks, and ensure that the UK can take early advantage of the applications those networks may enable.

The Commission’s central finding is that mobile connectivity has become a necessity. The market has driven great advances since the advent of the mobile phone, but Government must now play an active role to ensure that basic services are available wherever we live, work and travel, whilst our roads, railways and city centres must be made 5G ready as quickly as possible.

Recommendation 4 states:

“Local Government should actively facilitate the deployment of mobile telecoms infrastructure.” This proposal enhances EE Limited and H3G UK Limited’s mobile network and is required to provide mobile coverage and connectivity in this busy residential area.

Paragraph 3.4 states:

"These issues need to be addressed to enable widespread provision and adoption of various future services in the UK, with high quality mobile access where people live, work and travel. Addressing coverage issues now will provide the infrastructure platform on which successive generations of mobile technology will sit, be they 5G, 6G or next generation Wi-Fi."

This site is an important part of this ethos and will provide good mobile coverage where people live, work and travel.

DCMS MHCLG Collaborating for Digital Connectivity

Please see the enclosed document from Margot James MP and Rishi Sunak MP regarding Local Authority support for 5G rollout. This letter was sent to all Local Authority CEOs but we appreciate that the Planning Department may not have had the benefit of receiving it directly. It provides useful context on the role that Local Authorities are required to play in ensuring that the rollout of 5G coverage is achieved, by ensuring that there are "policies and procedures in place that promote effective engagement with the digital communications industry and minimise barriers to deployment".

1.1.5. National Policy

National Planning Policy Framework

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

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

Section 6 – Building a strong, competitive economy

Section 10 – Supporting high quality communications

Section 12 – Achieving well-designed places

The following paragraphs need to be considered in relation to this policy:

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

Paragraph 112 – "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections."

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

Paragraph 113 – "Use of existing masts, building and other structures for new electronic communications capability (including wireless) should be encouraged."

In relation to this paragraph, the proposal is for the upgrade of an existing telecommunications site which will allow for the introduction of 5G coverage to the area.

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

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

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

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

In relation to this paragraph, consultation was carried out with Councillor Leo Gibbons, Peter Bernards, Sophie Davis, Fairlawn Primary School Headteacher and Chair of School Governors, Saint Francesca Cabrini Primary School Headteacher and Chair of School Governors, Honor Oak Preschool, and the Local Planning Authority. The Local Planning Authority responded to request a fee of £900 for pre-application, which we did not proceed with as it was cost prohibitive. No further responses were received. The site is not located within 3km of an aerodrome, technical site or military explosives storage area. An ICNIRP certificate is provided with this application to confirm that the proposal will not exceed International Commission guidelines. The proposal is for the upgrade of an existing site and therefore no evidence is required that alternative sites were sought.

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

In relation to this paragraph, the scheme proposes the minimum amount of equipment required to allow for the upgrade.

1.1.6. Site Need and Identification

The proposal is to upgrade an existing site; therefore no alternative sites were considered.

In addition to the above, the site will form part of an improved upgraded network for the operator which will introduce 5G coverage and increase capacity to reduce the number of call drop outs.

Coverage - The licence granted to EE & H3G demands that strict coverage qualities are met. It is essential that the benefits of mobile telephones are available for all the population. The changing customer use of mobile phones also demands that networks and coverage is available at home, in the workplace, while shopping, enjoying leisure activities or while on the move. Additionally, the proposed upgrade will provide benefits in the form of 5G coverage.

Quality - In order to ensure coverage within buildings such as homes, shops, offices etc. the radio signal has to be of sufficient strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, some less than 1 km apart.

Capacity - As the use of and demand for mobile phones has increased the number of sites required to provide Network capacity has increased. Each cell or base station can only handle a finite number of calls so in areas of high use additional cells are required to meet demands on the network and thus avoid existing cells going into congestion.

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

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

It is for these reasons that it is important to achieve a service of quality for mobile users. The main complaints received by mobile telephone operators about their service relate to the problems associated with dropped calls and no service. As more and more people are using tablets and smart phones there is a need to ensure that existing sites can meet this demand. This is one such site as due to the location of the site, in a highly residential area and close to the train line, there is a high level of traffic to it.

1.1.7. Health and Safety

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

2. ACCESS

Access to the site will remain unchanged, as will the on-going traffic visiting the site. We do not envisage additional maintenance visits incurring, and being new equipment, the likelihood of requiring visits for repair is remote.

3. CONCLUSION

This is an upgrade of an existing site; it is not considered that the proposal will have a majorly noticeable impact on the surrounding area. It will also introduce 5G coverage to the area, which will help the Government achieve their target to make the UK a world leader in 5G.

We hope this information is sufficient for you to consider this application favourably.