

Committee Date	30.04.2020	
Address	Transmitter Mast 802348 Sea Cadets Ts Narvik Magpie Hall Lane Bromley	
Application Number	20/00659/FULL5	Officer - Susanna Stevenson
Ward	Bromley Common And Keston	
Proposal	The removal and replacement of the existing antenna (supporting flagpole to remain in situ) and 2No. existing equipment cabinets with a 20 metre high monopole and 6 No. upgraded equipment cabinets, and ancillary development	
Applicant	Agent	
MBNL For And On Behalf Of EE Limited & H3G UK Limited	Miss Victoria Parsons	
Sixth Floor Thames Tower Station Road Reading RG1 1LX	St John's House Barrington Road Altrincham WA14 1JY	
Reason for referral to committee	Call-In	Councillor call in Yes

RECOMMENDATION	APPLICATION PERMITTED
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<p>KEY DESIGNATIONS</p> <p>Areas of Archaeological Significance Biggin Hill Safeguarding Area Former Landfill Site Green Belt London City Airport Safeguarding Smoke Control SCA 19</p>

Land use Details		
	Use Class or Use description	Floor space (GIA SQM)
Existing	Class D1 Sea Cadets site	N/A
Proposed	Class D1 Sea Cadets site	N/A

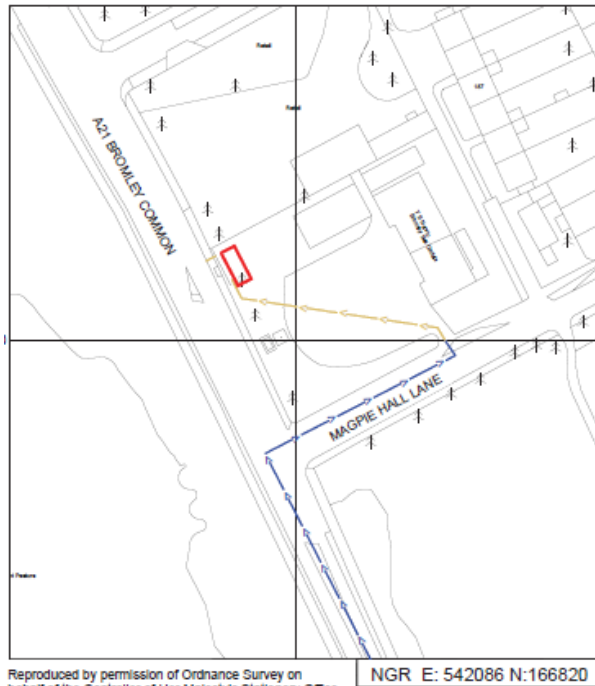
Representation summary	Site notice displayed expires Press Advert expires 01/04/20 Letters to neighbouring residents (115)	
Total number of responses	20	
Number in support	1	
Number of objections	19	

1. SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposal would upgrade an existing telecommunications site to provide improved and enhanced telecommunications coverage.
- The proposal would not have a significant impact on residential amenity
- The design of the mast and the layout of the equipment compound is acceptable and would not have a significant impact on visual amenity or the openness of the Green Belt.

2. LOCATION

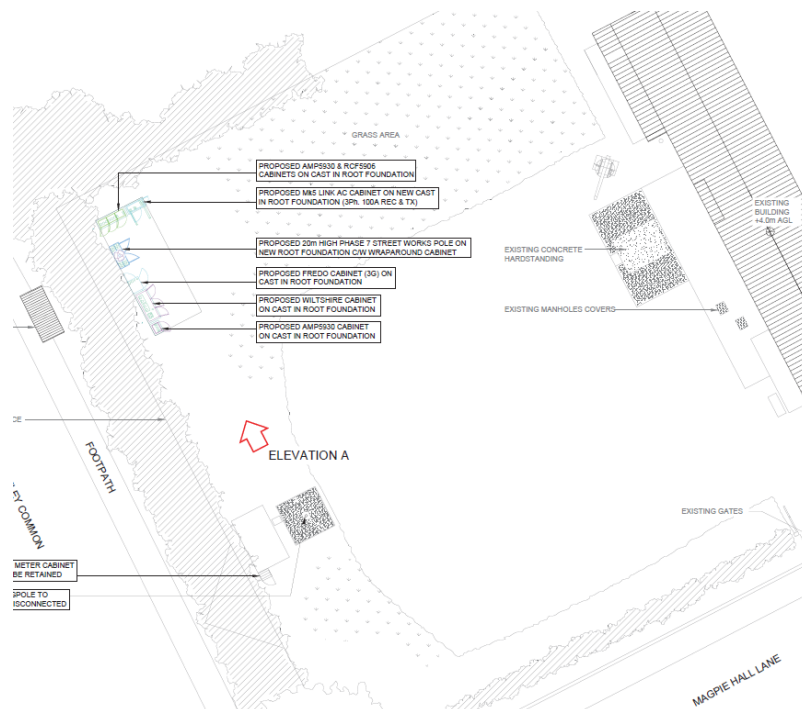
- 2.1 The application site lies on the corner of Magpie Hall Lane and Bromley Common (A21). It comprises mostly of hardstanding parade ground associated with the Sea Cadets building and is bounded by trees/hedging. The proposed mast would be sited in the north-western corner of the site.
- 2.2 To the north of the site are the barns positioned on land known as Potters Farm. To the east are residential flats which front Turpington Lane and Magpie Hall Lane as well as a number which overlook the application site. To the south and west is open land.
- 2.3 The site is accessed from Magpie Hall Lane.



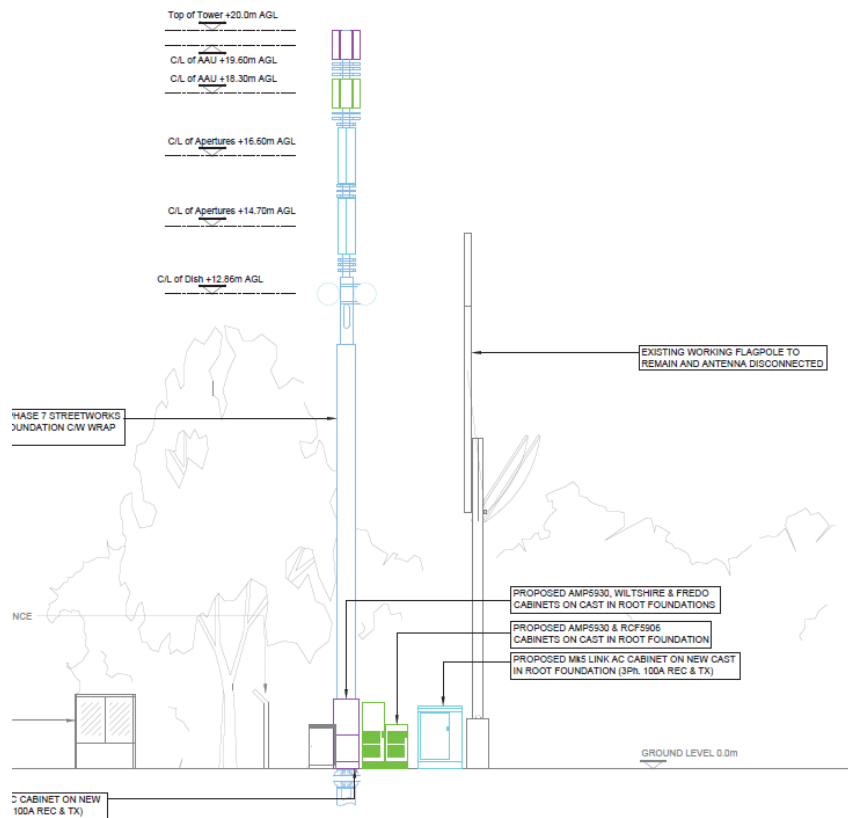
SITE LOCATION PLAN
SCALE 1:1250

3. PROPOSAL

3.1 The application seeks permission for the installation of a 20m high telecommunications mast which would be sited within a compound in the north western corner of the site. The mast would be sited approx. 2m from the existing palisade fencing at the front of the site and approx. 4m from the boundary with the Potters Farm site lying adjacent.



- 3.2 The mast would be of generally streamlined appearance with a diameter of approx. 0.5m to a height 11.5m above ground level. Above this height the mast would incorporate stacked antennae with a slightly wider profile (approx. 0.8m diameter) in the top 2m section.



- 3.3 6 no. equipment cabinets are proposed to be provided, aligning with the mast position and parallel with the front boundary palisade fencing.
- 3.4 The existing flagpole antenna would be disconnected, while the structure itself would be retained as a functioning flagpole for use by the Sea Cadets. A meter cabinet at the base of the mast would be retained.

4. RELEVANT PLANNING HISTORY

- 4.1 The relevant planning history relating to the application site is summarised as follows:
- 4.2 01/03562/TELCOM - 15m high telecommunications pole with antenna and equipment cabin - Prior Approval Required and Granted

- 4.3 15/00802/FULL1 - Demolition of existing buildings at Potters Farm and Sea Cadets Magpie Hall Lane, and erection of two part two/three storey blocks comprising a total of 39 flats, re-provision of Sea Cadets facility with residential parking for 34 cars, cycle storage and landscaping - Refused and Dismissed on Appeal.
- 4.4 16/04640/FULL2 - Change of use of sea cadets hall car park and outbuilding to combined sea cadets hall car park and hand car wash and use of outbuilding ancillary to the hand car wash with vehicular access - Refused and Dismissed on Appeal.
- 4.5 19/02447/FULL5 - Upgrade of mobile base-station to include installation of 20m high monopole supporting radio apparatus, replacement of 2No. equipment cabinets with 12No. upgraded cabinets within new site compound, and ancillary works. Planning permission refused on ground:

“The proposed development to its height and design would be an obtrusive and highly prominent feature in the street scene, out of character and detrimental to the visual amenities of the surrounding area and the openness of the Green Belt, contrary to Policies 37, 49 and 89 of the Bromley Local Plan.”

5. CONSULTATION SUMMARY

A) Statutory

TfL – Consulted. Response awaited.

B) Adjoining Occupiers

Objections

- Health impacts including psychological effects of 5G technology and impact on health of children using the Sea Cadet unit and upon the neighbouring proposed bungalows
- 5G is unnecessary
- Visual impact of the mast
- Impact on outlook
- Increased traffic
- Damage to ground
- Reduction in size of the parade ground and surrounding area
- Financial offer to the unit is unacceptable and less than the existing income

Support

- 5G is required to keep up with progress.
- Current 4G in area not brilliant

6. POLICIES AND GUIDANCE

National Policy Framework 2019

- 6.1 Section 6 – Building a strong, competitive economy
- Section 10 – Supporting high quality communications
- Section 12 – Achieving well-designed places

The London Plan

- 6.2 Paragraphs 1.38 - 1.41 of the London Plan relate to the need to ensure the infrastructure to support growth within London, referring to the strategic importance of providing adequate infrastructure, including modern communications networks.
- 6.3 Chapter 4 of the London Plan includes the strategic objective in Policy 4.11 of "encouraging a connected economy." The policy itself states that the Mayor, GLA and all other strategic agencies should facilitate the delivery of an ICT network to ensure suitable and adequate network coverage across London which will include "well designed and located street-based apparatus."

Draft London Plan

- 6.4 The 'Intend to Publish' version of draft London Plan (December 2019) is a material consideration in the determination of this planning application.
- 6.5 The draft new London Plan was submitted to the Secretary of State (SoS) on 9 December 2019, following the Examination in Public which took place in 2019. This is the version of the London Plan which the Mayor intends to publish, having considered the report and recommendations of the panel of Inspectors. Where recommendations have not been accepted, the Mayor has set out a statement of reasons to explain why this is.
- 6.6 The London Assembly considered the draft new London Plan at a plenary meeting on 6 February 2020 and did not exercise their power to veto the plan.
- 6.7 Ahead of publication of the final plan, the SoS can direct the Mayor to make changes to the plan. This affects the weight given to the draft plan. At this stage, the Council's up-to-date Local Plan is generally considered to have primacy over the draft London Plan in planning determinations.
- 6.8 D4 Delivering Good Design
G2 London's Green Belt
SI 6 Digital connectivity infrastructure

Bromley Local Plan 2019

- 6.9 32 Road Safety

37 General Design of Development
42 Development adjacent to a Conservation Area
49 The Green Belt
89 Telecommunications Development

7. ASSESSMENT

- **Principle of development**
- **Design**
- **Green Belt**
- **Neighbourhood Amenity**

Principle of development – Acceptable

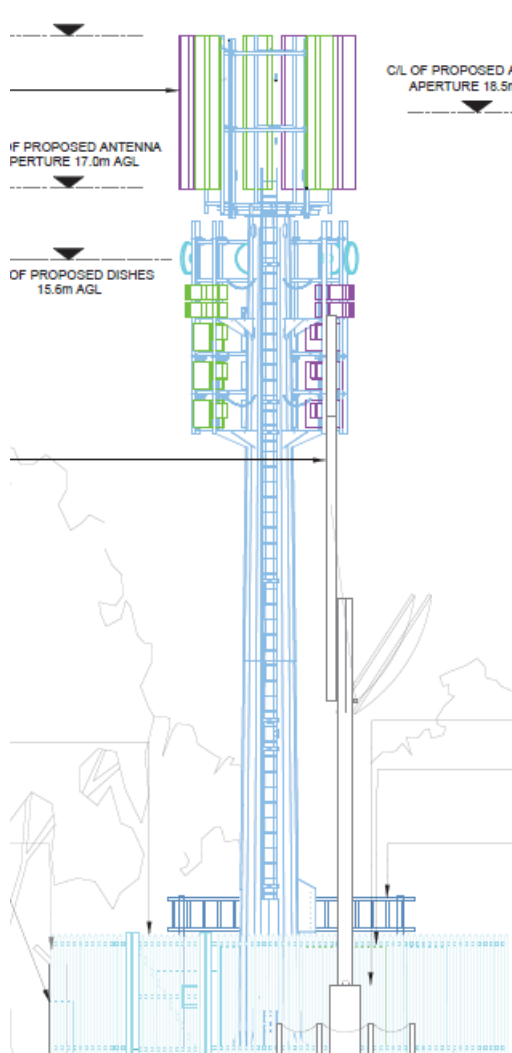
- 7.1.1 It is noted that the site has been the subject of a previous application ref. 01/03562/TELCOM which granted prior approval for a 15m high telecommunications mast with antenna and ancillary cabinet. The existing plans indicate that the existing flagpole with antenna has a height of 14.5m.
- 7.1.2 A site selection process has been carried out by the applicant and is referred to in the covering letter where it is stated that the site has been identified as the only viable location in the area. The applicant also refers to the base-station's adherence to the desirability of site sharing of existing sites.
- 7.1.3 In the assessment of the previous application, refused under reference 19/02447, the site identification process and conclusions were not disputed and the ground for refusal does not relate to the principle of the upgrading of the existing telecommunications site.
- 7.1.4 The site has an existing telecommunications development and therefore an upgrade to the site may be considered acceptable in principle, subject to consideration of the impact of the design and height of the mast and the siting of the enclosure and cabinets upon the visual amenities of the area, the openness of the Green Belt and the amenities of neighbouring residents.

Design- Acceptable

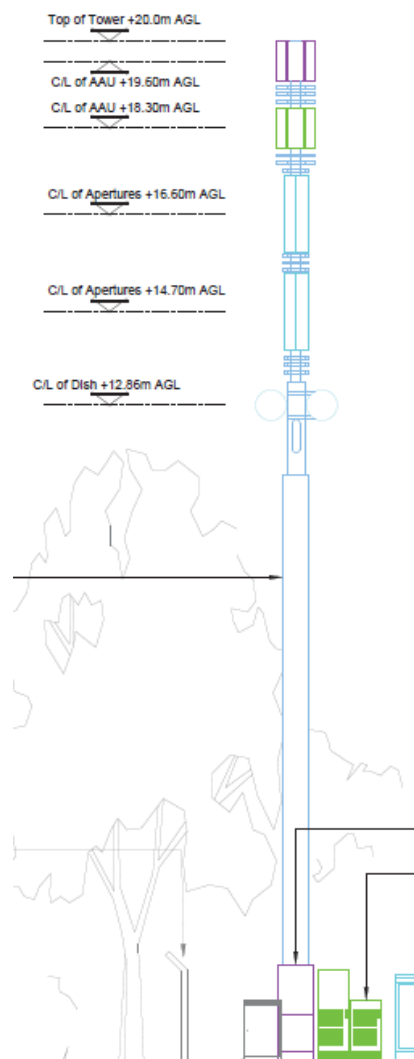
- 7.2.1 Design is a key consideration in the planning process. Good design is an important aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 7.2.2 London Plan and Bromley Local Plan policies further reinforce the principles of the NPPF setting out a clear rationale for high quality design.
- 7.2.3 The application is accompanied by a further document titled '5G and Future Technology' which outlines how the equipment needed to deliver 5G technology would change. It highlights that higher frequencies of 5G do not travel as far as previous generations, and that signals are more prone to

shadowing effect from adjacent buildings/ structures and the clipping effect of building edges. As a result, in order to provide a public benefit of improved connectivity it states that more infrastructure would be required and that equipment will have to be either closer to the buildings edge or higher.

- 7.2.4 It is therefore noted that the implementation of 5G will inevitably result in some alteration to the design and height of telecommunications equipment. It falls to consider whether the increase in height and the design of the structure would have a detrimental impact on visual amenity.
- 7.2.5 The increase in height and alteration to the design compared to the existing flagpole design would result in a greater impact on the visual amenity of the street scene. The mast would no longer be disguised as a flagpole and would be readily appreciable as a telecommunications mast rather than integrating visually into the site as is the case with the existing flagpole.
- 7.2.6 The proposal would however represent a significant improvement in terms of the design and appearance of the mast over that which was refused planning permission under reference 19/02447/FULL5. The images below show the previously proposed structure and the current proposal next to each other.



19/02447/FULL5 REFUSED



20/00659 PROPOSED

7.2.7 While the overall height of the mast has not reduced, the bulk of its appearance is significantly less than the previous proposal. The appearance of the mast is improved through the incorporation of the antennas/dishes within a more streamlined proposal where the overall width of the structure plus attached antennas/dishes maintains a more uniform diameter and a less visually intrusive appearance.

7.2.8 The mast would still, as a consequence of its siting in relation to the main road adjacent, be highly visible within the street scene and from neighbouring land. However, on balance it is considered that the visual impact of the proposal has been mitigated to a satisfactory extent through the narrowing of the installation and that the proposed design of the mast would be acceptable.

Green Belt - Acceptable

- 7.3.1 Paragraphs 133 - 147 of the NPPF sets out the Government's intention for Green Belt. The NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 7.3.2 Para 144 of the NPPF advises that LPAs should give substantial weight to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal is clearly outweighed by other considerations.
- 7.3.3 Openness is an essential characteristic of the Green Belt and is different from visual impact. Openness is about freedom from built form. Even if there is absence of harm to openness, there can be harm in principle to the Green Belt from inappropriate development.
- 7.3.4 With regards to the proposed siting of the telecommunications equipment in the Green Belt, it may be considered that a lack of suitable alternative sites that would meet the needs of network coverage could be considered as very special circumstances which would outweigh the degree of harm to the Green Belt. The developer has stated there are no preferable sites available within the required 100m radius, and given there is an existing telecommunications use on the site it may be considered that the benefits of siting the equipment in the Green Belt may be acceptable in principle.
- 7.3.5 However, whilst the siting of the mast within the Green Belt may be considered acceptable in principle, the current application seeks a significant increase to the height and bulk of the mast in comparison to the existing flagpole design. Furthermore, the proposed enclosure and cabinets would also contribute to its impact on the openness of the Green Belt.
- 7.3.6 However, the existing vegetation would provide some screening to the proposed ground based equipment and the lower section of the mast and on balance, it is considered that the streamlined design and appearance of the structure would mitigate the visual impact of the mast to such an extent as to limit its impact on the openness of the Green Belt. The proposal has reduced the projection of the compound area into the grassed area associated with the Sea Cadets site from approx. 6.25m to 3.65m and the site coverage of the compound from approx. 37.24sqm to 31.89sqm
- 7.3.7 Taking into account the policy considerations associated with the benefits of improved telecommunications infrastructure it is considered that there are very special circumstances which would outweigh the limited harm to Green

Belt openness associated with the increased height and amended siting of the telecommunications mast.

Neighbouring Amenity - Acceptable

- 7.4.2 With regards to the impact on residential amenity, the proposed mast would be sited to the north-western corner of the site, the opposite side of the site to the closest residential properties on Turpington Lane. It appears there would be a separation distance to residential properties of in excess of 60m, and whilst it may impact upon views from residential properties it is not considered that it would result in a significant or unacceptable loss of light or outlook to nearby residential properties.
- 7.4.3 In terms of the concerns raised over the impact on health, the application includes an ICNIRP certificate to confirm that the development would meet the guidelines of the ICNIRP for public exposure.
- 7.4.4 Government guidance is that in these circumstances it should not be necessary to consider further the health aspects and concerns about them. While the perception of health risk is noted, in view of the conformity of the proposed installation with the Commission's standards, it is not considered that this concern would be founded. No technical objections have been raised from an Environmental Health perspective to the proposals.
- 7.4.5 Other concerns have been raised regarding the impact of the proposal on the bungalows proposed to be sited on the adjacent Potters Farm site. However, while there are extant permissions for residential development on the adjacent land, these have not been implemented.
- 7.4.6 Other concerns have been raised regarding the loss of land for use by the Sea Cadets. However, the area of land upon which the mast and cabinets would be sited is located in the extreme corner of the site, adjacent to the main road, and taking this into account it is not considered that the proposal would have a significant impact on the continued functioning of the Cadets use of the site.
- 7.4.7 It is noted that concern has been raised regarding the traffic implications of the proposal. However no technical objections have been raised by the Council's Highways Officer. Transport for London has been consulted and comments (if any) reported verbally.

8. CONCLUSION

- 8.1 The installation of a telecommunications mast and equipment is considered acceptable in principle, taking into account the site's existing telecommunications development and the planning history of the site.

- 8.2 Whilst it is acknowledged that the mast would be higher than the existing flagpole mast, it is of a streamlined design with more uniform diameter than that refused permission and would be sited sensitively in the context of the site. It is considered that the proposal has fully addressed the previous reason for refusal given the revised slim line design, siting and reduction of the equipment compound.
- 8.3 The proposal would provide an upgraded/enhanced telecommunications coverage and would involve the sharing of an existing site between two operators. It is considered that the benefits of the development associated with improved mobile telecommunications coverage would outweigh the limited impact of the development on the openness of the Green Belt.
- 8.4 While health concerns have been raised regarding the 5G technology associated with the mast, the application is accompanied by an ICNIRP certificate and government guidance relating to health impacts associated with such development, states that in these circumstances it should not be necessary to consider further the health aspects and concerns associated with them within the scope of a planning application.
- 8.5 Background papers referred to during production of this report comprise all correspondence on the files set out in the Planning History section above, excluding exempt information.

RECOMMENDATION: PERMISSION

SUMMARY OF CONDITIONS AND INFORMATIVES

Standard Conditions

- 1. Time Limit**
- 2. Accordance with plans**

Compliance Conditions

- 3. Remove redundant telecommunications equipment**
- 4. Disconnect existing antenna in flagpole**

Any other planning condition(s) considered necessary by the Assistant Director of Planning