



Design, Access and Supporting Statement

in respect of Full Planning Application

On behalf of New Line Networks LLC

at

**Parkview House
Sunrise Avenue
Hornchurch
RM12 4YW**



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1.0 Proposed Development

1.1 Site Search Process

This supporting statement aims to assist the Local Planning Authority in the evaluation of the scheme currently proposed and aims to identify the reasoning behind the siting, design and appearance of the development.

In accordance with the advice in National Planning Policy Framework and the ODPM Code of Best Practice, New Line Networks LLC ("NLN") site selection strategy is to keep the overall environmental impact to a minimum and to reduce the proliferation of telecommunications sites where possible. The use of existing buildings, the sharing of masts or the upgrade and improvement of existing installations is always preferred where it is technically and legally possible, and where it is the local authority's preferred environmental solution.

The dish sizes currently proposed are determined by the length of the link and the strength of the signal received or transmitted and are the smallest possible in order to ensure that the data signal transmitted is to the quality required for the efficient operation of the network. Siting has been carefully considered, alternate options were investigated and were either found to be unsuitable because line of sight could not be achieved or unsuitable due to site provider's reluctance to host the equipment. Siting and design on this particular site have been carefully considered to create the links, yet to minimise the impact of the installation on surrounding buildings and views.

1.2 The Site

The proposed development is located on an existing structure, being Parkview House, Sunrise Avenue, Hornchurch, RM12 4YW. The building, which is a residential tower block, is not located within any specific designations or a listed building. The National Grid Reference for the site is **552999E, 186570N**.

The area surrounding the property is sited in a predominantly residential area, with other residential blocks and two-storey dwellings in the vicinity. The property is sited adjacent to Harrow Lodge Park, which contains a local Site of Importance for Nature Conservation. The proposal is to install four (4) no. new microwave transmission dishes, two (2) no. braced poles to support the dishes, one (1) no. new equipment cabinet and a section of new steel grillage, alongside a freestanding handrail, swing gate and access ladder. The braced poles and equipment cabinet will be affixed to the new steel grillage, which is to be supported on four (4) no. concrete plinths. The main roof level is 36m, with a parapet standing at 37.67m, where the grillage is installed on the concrete plinths, the height will rise to 37.82m, with the proposed dishes being at 39.92m. The building also features a plant room, where the roof height is 40.76m. When viewed from the south, the installation will sit in front of this plant room.

In the siting and location of this proposal, NLN have had regard to: -

Local development plan policy;

Government guidance in the form of the National Planning Policy Framework;

1.3 Design Component

Due consideration has been given with regard to technical, engineering, environmental and land use planning within the design of the proposed telecommunications installation.

The principal components of the proposed development are outlined on the Supplementary Information Template, and the general layout illustrated on the attached site layout plan and elevations.

The bearings of the dishes reflect the direction of the microwave transmission links.

The proposed equipment is as follows:

Dish 1 - 0.9m Transmission Dish – Bearing approximately 78 Degrees – This dish will be located on a new braced pole alongside dish 2 on rooftop at a height of 39.92m which will be minimally visible on the skyline due to the height and proximity of nearby buildings, and it will also not be seen from many, if any viewpoints at ground level. It should be noted that the dish is “firing” to provide a link to a lower-level building nearby, so the exact position is important.

Dish 2 - 0.9m Transmission Dish – Bearing approximately 78 Degrees – This dish will be located on a new braced pole alongside dish 1 on rooftop at a height of 39.92m which will be minimally visible on the skyline due to the height and proximity of nearby buildings, and it will also not be seen from many, if any viewpoints at ground level. It should be noted that the dish is “firing” to provide a link to a lower-level building nearby, so the exact position is important.

Dish 3 - 0.9m Transmission Dish – Bearing approximately 265 Degrees – This dish will be located on a new braced pole alongside dish 4 on rooftop at a height of 39.92m which will be minimally visible on the skyline due to the height and proximity of nearby buildings, and it will also not be seen from many, if any viewpoints at ground level. It should be noted that the dish is “firing” to provide a link to a lower-level building nearby, so the exact position is important.

Dish 4 - 0.9m Transmission Dish – Bearing approximately 265 Degrees – This dish will be located on a new steel pole alongside dish 3 on rooftop at a height of 39.92m which will be minimally visible on the skyline due to the height and proximity of nearby buildings, and it will also not be seen from many, if any viewpoints at ground level. It should be noted that the dish is “firing” to provide a link to a lower-level building nearby, so the exact position is important.

Equipment Cabinet – The equipment cabinet will be attached to the new fixed grillage at a height of 37.82m, in front of and between the braced poles that support the transmission dishes. It will be minimally visible on the skyline due to the height and proximity of nearby buildings.

It should be noted that it is proposed to install the equipment on the northern side of the rooftop, in front of the plantroom, making use of an existing raised part of the roof in addition to four concrete plinths of 0.3m and 0.47m in height to install the required steel grillage. None of the equipment is proposed to reach above the roof of the plantroom, and indeed, from the south, the installation will not be visible due to the existing plantroom.

1.4 Access

Maintenance and build access for the installation will be as per existing arrangements for the building. Given that the proposed telecommunications dishes will be sited on the rooftop, the site will only be accessed by those personnel associated with the applicant. Access to the proposed site is set well away from recognised public rights of way and is remote from pedestrian and vehicular movements within the public realm.

There is no public access to the site for security and safety reasons.

1.5 Landscaping

It is considered that a scheme of soft or hard landscaping would be inappropriate in this case, as the proposal relates to the installation of electronic communications apparatus on the roof of a building to which there is no right of public access.

2.0 Pre-application Consultation

Given that the proposal is to install equipment on an existing structure, it has been rated as **Green** for consultation purposes and, as a result, consultation has not been carried out.

Local Planning Authority

As this application is for works to an existing building, is limited in nature, with permission having been previously granted for an identical proposal, it was considered unnecessary to carry out pre application consultation in this instance. It is not considered that there will be any major visible impact to the surrounding community as the proposal will be located on a tall building in excess of 30m.

Local Stakeholder Consultation

The site is an existing rooftop. As NLN are only installing limited equipment of less than 3m in height and planning permission has previously been granted for an identical proposal, this proposal has been rated as **Green** for consultation purposes and as such it is considered that additional consultation will not be required in this case.

3.0 Civil Aviation Authority/Secretary of State for the Defence/Aerodrome Operator

For this particular application the Civil Aviation Authority, the Secretary of State for the Defence and the aerodrome operator have not been informed of our proposal. No change to the height of the existing building is proposed, and the site is not within proximity of an airfield or aerodrome.

4.0 National Planning Policies

The Government published the National Planning Policy Framework (NPPF) in December 2024 and it supersedes previous versions of the document and national planning guidance contained in the various Planning Policy Guidance notes and Planning Policy Statements. The document sets out the Government's economic, environmental and social planning policies for England and how these are expected to be applied in relation to all planning applications.

From a telecommunication perspective core principle 10 of the NPPF, entitled 'Supporting High Quality Communications' sets out the government's aims with regards telecommunications. The framework states that the development of high-quality communications networks is fundamental to securing both economic and social wealth and well-being.

"Section 10 - Supporting High Quality Communications

119. 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. Policies should set out high quality infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

120. The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. 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.”

NLN is seeking to develop its network through the installation of base stations at existing telecommunications sites and on tall buildings in urban areas. This approach is entirely consistent with the telecommunications development national planning policy as set out in the National Planning Policy Framework. The application site was chosen as it is a tall building in the area, therefore being able to provide the “line of sight” technical requirement that will assist in minimising the visual impact of the development while meeting the overriding technical and operational coverage requirements of the proposal.

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

- a) they have evidence to demonstrate that telecommunications 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”*

The proposed dishes will not cause any significant and irremediable interference.

- b) “ they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and telecommunications services.”*

The proposal does not seek to construct a new mast or building. The building will remain generally as existing, with the proposal only causing a minimal change to its exterior appearance.

“122. 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 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 or 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.”*

An ICNIRP certificate is supplied with this application confirming that the proposal will meet with the relevant guidelines.

“123. Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or set health safeguards different from the International Commission guidelines for public exposure.”

It is considered that the application for this site I complies with the aims and objectives of the NPPF for the reasons outlined above.

5.0 Conformity to Local Planning Policies

Local and Regional Plan Policy

In terms of Local Plan Policies, by virtue of Section 70 of the Town & Country Planning Act 1990 [further enshrined in section 38(6) and the Planning and Compulsory Purchase Act 2004], development should be in accordance with development plan policies, unless material considerations indicate otherwise.

Local Plan Policy is enshrined within the London Borough of Havering Local Plan 2016-2031 (adopted November 2021). This document contains Policy 25 on the subject of Digital Infrastructure, which is further discussed below.

Health & Safety

We would remind the Council that the Government has set out its clear view on the issue of health and perceived view of health risks in paragraph 123 of the NPPF:

“Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure.”

As above, and included within this application, New Line Networks have confirmed this installation will be fully ICNIRP compliant.

THE LONDON PLAN, 2021

The London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In Paragraphs 1.5.1-1.5.6 *'Growing a good economy'*, the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks that London requires to secure its long-term growth.

It is considered that telecommunications networks are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in Policy SI 6 *'Digital Connectivity Infrastructure'* of the Plan. Policy SI 6, and its written justification, is clearly supportive of the role of improved network connections in the area.

The aim of the Infrastructure Plan is to enable for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 of the Plan indicates how the London Mayor's Office shall support an economically viable mix of technologies including fibre broadband, mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. This document is supported by the report Raising London's High-Speed Connectivity to World Class Level. As detailed within these Digital Connectivity is now considered the fourth utility. Internet access not only affects the productivity of businesses and proves essential to the future growth of many firms, it is also vital for many residents to take part in modern society (as more services move online).

The Mayor's Office shall work with central government and London's local authorities to ensure that strategic communication networks are enabled rather than inhibited by the planning and other regulatory systems (whilst ensuring the utility works themselves are properly managed).

New Line Network's networks are integral in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

“GG2 Making the best use of land

To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must:

A enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites

B prioritise sites which are well-connected by existing or planned public transport

C proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling

D applying a design-led approach to determine the optimum development capacity of sites

E understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London’s distinct and varied character

F protect and enhance London’s open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible

G plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth

H maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.”

The proposed development uses an existing high rise telecommunications site which is the most sustainable option available. Concentrating telecommunications apparatus on the rooftops of high rise buildings that are structurally capable of accommodating such development makes the best use of the limited land available in the area. Parkview House offers the degree of elevation required, as well as being capable of creating the required line of sight links necessary to function. The proposed equipment has been specifically designed for the site in question and located to ensure that it meets the technical needs required to provide the service supporting the financial services industry, whilst at the same time ensuring that the impact on the local townscape is minimised. It therefore satisfies the aims and objectives of Policy GG2.

“GG5 Growing a good economy

To conserve and enhance London’s global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

A promote the strength and potential of the wider city region

B seek to ensure that London’s economy diversifies and that the benefits of economic success are shared more equitably across London

C plan for sufficient employment and industrial space in the right locations to support economic development and regeneration

D ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London’s growth

E ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning

F promote and support London's rich heritage and cultural assets, and its role as a 24-hour city

G make the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity

H recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success."

The proposed development is sited in the heart of a residential area close to Harrow Lodge Park, to the east of central London. The UK-based financial and related professional services industry continues to play an enabling role in supporting economic growth. The proposed development aims to contribute to the provision of a high speed communication network that supports the operation and growth potential of the financial services sector at a national level. NLN is seeking to expand its network to enhance the services provided, which in turn will help support the economy by allowing data to be sent more easily from the USA, into London and out to Europe more quickly and in greater volume.

The UK is the world's largest net exporter of financial services – with a trade surplus of £61bn. It is a highly interconnected industry and across the country almost 40% of finance and related jobs are in a firm with a London base. It is therefore imperative that support be given to development which supports the industry, whilst at the same time respecting its environmental context, as is the case in this instance.

"Policy D4 Delivering good design

Design analysis and development certainty

A Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design-led approach.

B Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.

Design scrutiny

C Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.

D The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E if they:

1) include a residential component that exceeds 350 units per hectare; or

2) propose a building defined as a tall building by the borough (see Policy D9 Tall buildings), or that is more than 30m in height where there is no local definition of a tall building.

E The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:

- 1) design reviews are carried out transparently by independent experts in relevant disciplines*
- 2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme*
- 3) where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews*
- 4) design review recommendations are appropriately recorded and communicated to officers and decision makers*
- 5) schemes show how they have considered and addressed the design review recommendations*
- 6) planning decisions demonstrate how design review has been addressed.*

Maintaining design quality

The design quality of development should be retained through to completion by:

- 1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development*
- 2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design*
- 3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter*
- 4) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion."*

In preparing a scheme, due care and attention was paid to the characteristics of the existing building, as well as the location of the site. Optimising the use of land is essential in such a highly developed area. The nature of the services provided by NLN requires equipment to be located at a high level in order to achieve the required point to point transmission links.

The proposed development is small in scale and therefore many of the mechanisms for reviewing design are not appropriate in this instance. Nevertheless, design quality will be maximised for the type of development involved and the design is considered to be appropriate for the use proposed, the building on which it is located and the site environs also. The dishes proposed be easily assimilated in this context.

"Policy D9 Tall buildings

Definition

A Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but

should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.

Locations

B 1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.

2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.

3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.

Impacts

C Development proposals should address the following impacts:

1) visual impacts

a) the views of buildings from different distances:

i long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views

ii mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality

iii immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding

c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan

d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area

e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it

f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river"

g) buildings should not cause adverse reflected glare

h) buildings should be designed to minimise light pollution from internal and external lighting

2) functional impact

a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants

b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process

c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas

d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building

e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area

f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings

3) environmental impact

a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building

b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions

c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building

4) cumulative impacts

a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.

Public access

D Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.

The scale and form of the equipment proposed is considered to be entirely appropriate relative to the scale and form of the building on which it is to be sited. The equipment is sited on the northern side of the building behind a raised plant room to ensure that views will not be unduly harmed by the proposed development. The dishes will not rise above the height of the existing plant room.

The design and quality of the materials to be employed will ensure that the appearance and architectural integrity of the building is maintained. The proposed equipment will not interfere with aviation, navigation or other nearby telecommunication apparatus. The scale of development proposed relative to the size and scale of the existing building will ensure that the cumulative impact of the proposed development will not cause any undue harm to the characteristics of the building or its environs. There is no public access to the areas on the rooftop where telecommunications apparatus is sited. Access is only allowed for authorised personnel for obvious reasons. It is therefore considered that the proposed development fully complies with the aims and objectives of Policy D9.

LONDON BOROUGH OF HAVERING LOCAL PLAN 2016-2031 (ADOPTED NOVEMBER 2021).

The Local Plan sets out its planning strategy with regards to telecommunications in Policy 25 Digital Infrastructure.

Policy 25 Digital infrastructure

The Council seeks to promote the enhanced connectivity of Havering by supporting the delivery of physical infrastructure capable of delivering high-speed broadband services and improved telecommunications coverage.

The Council will therefore support major development which future-proofs developments to accommodate high speed broadband infrastructure.

Developments should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified.

Applications for telecommunications equipment will be considered against the requirements of the National Planning Policy Framework. The Council will support proposals that:

- i. Utilise existing masts, buildings and other structures unless the need for a new site can be robustly justified;*
- ii. Integrate successfully with the scale, character and appearance of the building on which or space in which the equipment is located, and the surrounding area; and*
- iii. Do not have an unacceptable adverse impact upon the borough's heritage assets or the natural environment."*

This policy is clearly supportive of the role of improved network connections in the borough. It also lays out its commitment to consider applications for telecommunications equipment against the requirements of the National Planning Policy Framework. In addition, it supports the use of existing buildings and other structures for new sites and advises that installations should integrate with the surrounding area and not have an unacceptable adverse impact on the borough's heritage assets or natural environment.

New Line Network's application seeks to enhance the network connections across the London Borough of Havering. The proposed location on the rooftop of an existing building is considered to be the most appropriate location and also meets the stated expectations in the Local Plan documents, as identified above. In all these circumstances the proposed development supports the aims and objectives of Policy 25.

Policy 26 Urban design

The Council will promote high quality design that contributes to the creation of successful places in Havering by supporting development proposals that:

- i. Are informed by, respect and complement the distinctive qualities, identity, character and geographical features of the site and local area;*
- ii. Are of a high architectural quality and design;*
- iii. Provide creative, site specific design solutions;*
- iv. Respect, reinforce and complement the local streetscene;*
- v. Provide active streets, good sight lines and natural surveillance;*
- vi. Are designed in accordance with the principles of Secured by Design;*
- vii. Respond to distinctive local building forms and patterns of development and respect the visual integrity and established scale, massing, rhythm of the building, frontages, group of buildings or the building line and height of the surrounding physical context;*
- viii. Fully integrate with neighbouring developments, existing path and circulation networks and patterns of activity particularly to accommodate active travel;*
- ix. Provide well-defined public realm with defensible private spaces;*
- x. Are built of high quality, durable, robust, low maintenance materials that integrate well with surrounding buildings;*
- xi. Provide a high standard of inclusive access for all members of the public;*
- xii. Demonstrate adequate on-going maintenance and management arrangements; and*
- xiii. Make use of design competitions or other creative processes that can improve the design quality.*

The council will require development proposals of a strategic nature to be subject to Design Review.

The proposed development has been specifically designed for the site in question, taking into account the characteristics of the building, its setting and its contribution to the overall character and appearance of the area. The rooftop hosts a raised section of rooftop plant which will provide the backdrop to the proposed dishes. None of the proposed equipment will rise above the height of the highest part of the roof. Views of the equipment from ground level will be limited by the height of the building, the location of the equipment on the northern side of the building behind the raised plant room and the belt of mature trees close to Harrow Lodge Park Greenway.

6.0 Alternative options considered

In this instance, there are very few options that would meet NLN's technical requirement as they need to link different buildings with the installation and also the proposal needs to be located within close proximity to the existing site.

Other buildings in the area were also considered, but none could offer the building height that Parkview House could.

7.0 Health and Safety

Telecommunications planning guidance states that it is not for the local planning authority to seek to replicate, through the planning system, controls under the health and safety regime as it is a matter for the Health and Safety Executive.

The Government guidelines state that provided a proposed installation meets the ICNIRP guidelines for public exposure, then it should not be necessary for the local planning authority to consider the impacts of health concerns.

In this case the equipment is safe by design given that the microwave transmission link works on point-to-point pencil beam in forward direction only. No radiation is given off away from the pencil beam. Considering this it is confirmed that the proposed equipment and installation complies with ICNIRP guidelines and a Certificate of Compliance has been submitted in support of the application. It is noted that the installation will not affect any of the existing telecommunications infrastructure in terms of health and safety.

8.0 Technical Justification

This application relates to the installation of Microwave Telecommunications dishes and not satellite dishes which are significantly larger in surface area.

Microwave Telecommunications dishes are generally used for point-to-point Telecommunications services and hence must have a clear line of sight to the point they transmit to and receive signals from. To enable this unhindered line of sight to be obtained requires precise positioning of equipment at a height to enable the link to clear any obstructions. Line of sight surveys have been completed from the proposed locations on the subject building.

9.0 Benefits to the UK Financial Sector

The proposed development aims to contribute to the provision of a high speed communication network that supports the operation and growth potential of the financial services sector at a national level (i.e. the wider impact area). In particular the development aims to assist the expansion of the UK's role in international business and trading between Europe and the US, as well as act as a hub for a variety of other communication functions that will enhance the coverage of services in the City of London (i.e. the local impact area).

An increasingly important component of the financial services sector is the development of financial technology known as 'Fintech' which is a high growth market that plays a major role in providing the innovation and infrastructure that is essential to the operations of the world's financial institutions. It has been estimated that around 15% of the revenue generated annually by the UK Fintech market is generated directly by the capital and trading markets, which strongly depend on quality communication and network infrastructure.

In November 2013, the City of London provided commentary on the role of the financial services sector in the document '*An Indispensable Industry: Financial Services in the UK*'. The document states on Page 1 that:

"The financial services industry and associated professional services also provide vital support for the UK economy. Between them, they employ around two million people, the majority outside London and the South East. They contribute billions of pounds of tax to the exchequer every year, and earn valuable export earnings for the country. And British skills and experience have turned London into a leading international finance centre which hosts many of the world's premier financial markets... The UK's prosperity depends on a continuing partnership between the financial and professional services industry and the wider economy."

The UK government's current FinTech Sector Strategy aims to maintain the UK as the best place to start and grow a FinTech business - through supporting competition and removing barriers to entry and growth. In 2015 UK FinTech State of the Nation was published by the Department for International Trade, HM Treasury and Innovate Finance. It stated

"..Technology has the power to increase transparency and efficiency, reduce cost, and give the most vulnerable access to financial services. Society and businesses both stand to gain from these changes, as incumbents are challenged by the new wave of digital innovation."

The UK has long been at the forefront of financial services. However, in more recent times, the sector's positive response to the fourth industrial revolution has truly set us apart. The perfect storm caused by growing technology demand, right touch regulation, and customer empowerment in financial services, coupled with the sectors response to the financial crisis, has fuelled FinTech's rapid growth in the UK and its expansion globally..... The UK government recognises the positive impact that FinTech has had on financial services, making it easier, cheaper and faster for consumers and businesses to access products that better meet their needs. FinTech also

addresses the needs of underserved markets, including the financially excluded, and it helps to tie together an increasingly interconnected world, promoting trade and global growth.”

In this context the financial services sector is a main driver of the UK economy and is anticipated to be an increasingly important source of economic growth and competitiveness in evolving global markets. The Government's document *'Fintech: The UK's Unique Environment for Growth'* (2015) states the financial services sector accounts for almost 10% of the UK's Gross Domestic Product (GDP), stating on Page 2 that the UK financial services sector:

“...is one of the largest globally, and more active than those of the UK's continental European peers.”

In February 2016, the Treasury published *'UK FinTech: On the Cutting Edge'*, which sought to consider the environment for Fintech in the UK and compare it with the environment in other leading financial hubs (e.g. California and New York). The report focuses on the current ability of the UK to respond in four key areas: access to skilled talent, investment in Fintech, policy and regulation and demand; identifying actions that the UK could take to improve the environment that it offers to the sector. The study identifies that the UK Fintech sector:

- 1 Increased in stature since 2008 to become the global Fintech capital.
- 2 Represented approximately £6.6 billion in revenue in 2015 and attracted approximately £524 million in investment.
- 3 Supports approximately 61,000 people in employment, which equates to around 5% of the total financial services workforce.
- 4 Supports more workers than in New York Fintech, or in the combined Fintech workforce of Singapore, Hong Kong and Australia.

The Government's *'On the Cutting Edge'* document has also shown that any delay in investing in the continued enhancements of Fintech infrastructure will reduce the competitiveness of UK capital and trading markets in the global market and therefore decrease the future economic growth potential of the UK. The study states that there is strong competition from other regions across the globe and that in order to maintain a world leading position; the UK will need to work hard to deliver and respond to growth in investment and employment.

The City of London Corporation runs “The Global City” to showcase the UK as a place for financial and professional services firms to locate, invest and grow. Fintech is seen as shaping the future of financial services. The Global City website comments as follows:-

“The UK's proposition for fintech is unique: world-class talent, UK-wide expertise, a forward-thinking approach to regulation, access to capital, and proximity to an innovative financial services sector. This ideal environment has put the UK at the cutting-edge of fintech innovation – from peer-to-peer lending to challenger banks, cyber, insuretech, regtech, AI, paytech, tech for good, and blockchain.

Fintech is more than a subsector in the UK. The whole financial services industry has embraced its evolution, delivering new client-centric and innovative products, services, and solutions. Driven by innovation and technology, the sector is increasing the efficiency of established players and strengthening connections with financial centres across the world. Fintech bridges are already in place with Australia, Hong Kong, Singapore, China, and South Korea.”

The importance of supporting the financial services industry and the associated fintech is clearly highlighted above. The proposed development seeks to introduce upgraded equipment on a pre-existing telecommunications site and has been specifically designed for the site in question taking into account the site location and characteristics. It should therefore be supported.

9.0 CONCLUSION

The proposed development is to facilitate strong transmission links between a number of London buildings and over into Europe. To enable this link a series of sites must be established with clear line of sight between each one. This requires sufficient height and also to be in a specific location in order for the links to be facilitated.

Aviation air space must also be avoided. In searching for available sites national and local planning policy guidance leads towards the use of existing established telecommunications sites. The site is one of few telecommunications sites which provide both the desired location and the height of structure to facilitate links. Furthermore, planning permission has previously been granted for an identical proposal. This permission is about to expire and accordingly this application seeks to renew the permission previously granted. There has been no demonstrable change in circumstances since the permission was originally granted to warrant a different decision.

National and local planning policy clearly sets out that any development which seeks to improve the telecommunications infrastructure, minimises visual impact and keeps telecommunications sites to a minimum should be supported in principle. Accordingly, the proposed development is considered to conform to national and local planning policies and should be supported.