



Planning Committee: B

Report title:

SKYLIGHT ROOFING CENTRES, MARTINS YARD, 198 DRAKEFELL ROAD, LONDON, SE4 2DS

Date: 09 November 2023

Key decision: No.

Class: Part 1

Ward(s) affected: Telegraph Hill

Contributors: Thomas Simnett

Outline and recommendations

This report sets out the Officer's recommendation of approval for the below proposal.

The report has been brought before Committee for a decision due to the submission of more than ten objections and three ward councillor objections.

Application details

Application reference number(s): DC/23/133124

Application Date: 1 September 2023

Applicant: Ms Helen Spoor on behalf of Cornerstone

Proposal: An application for Prior Approval under Part 16, Schedule 2 of the General Permitted Development Order (2015) (as amended) for the proposed installation of a 22.5m tower supporting 6 no. antennas and 3 no. dishes, with 6 no. equipment cabinets, and ancillary development thereto including meter cabinet and 2.1m high palisade fenced enclosure at Skylight Roofing Centres, Martins Yard, 198 Drakefell Road SE4.

Background Papers: (1) Submission Drawings
(2) Submission technical reports and supporting documents
(3) Internal consultee responses

Designation: PTAL 3
Air Quality
Local Open Space Deficiency
Telegraph Hill Article 4(2) Direction
Telegraph Hill Conservation Area
Not a Listed Building

Screening: Not applicable

1 SITE AND CONTEXT

Site description and current use

- 1 The application site is located within a merchant's yard which supplies roofing materials within Martins Yard, the area to which the proposed development would be located adjacent to shipping containers which are currently used on site for storage related to the roofing materials business.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

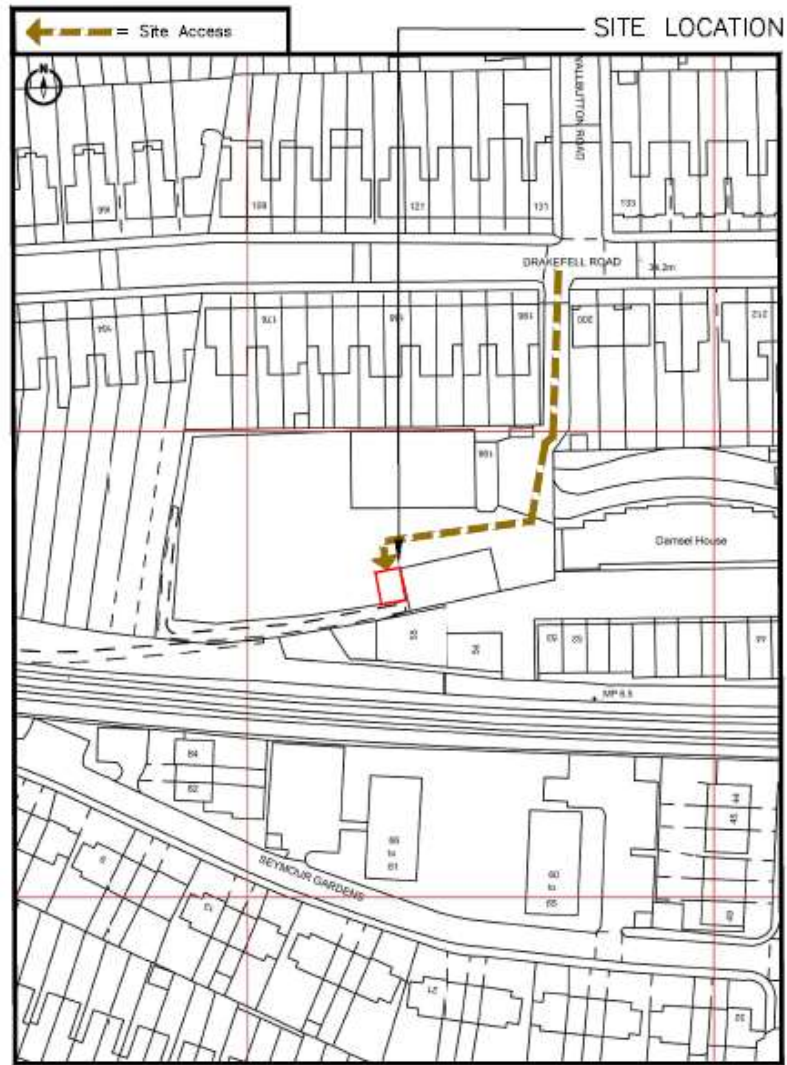


Figure 1 – Site Location Plan



Figure 2 – photo showing the location of the mast which would be adjacent to the two-storey building

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

Character of area

- 2 The site is situated in the yard of a roofing supplies business, which is of a light industrial nature. To the south are some small commercial buildings and large mature trees which separate the site from the railway line. Beyond its immediate setting the site is surrounded by residential properties, some of which are relatively new.

Heritage/archaeology

- 3 The site is located within the Telegraph Hill Conservation Area and the area is subject to the Article 4 Direction which only applies to dwellinghouses. It is not a listed building nor in the vicinity of one.
- 4 Martin's Yard is a light industrial site at the edge of the Conservation Area. It falls within the character area 3a of the Telegraph Hill Conservation Area Character Appraisal: "Good quality late 19th century development outside of the control of the Haberdashers' Company in eastern lengths of Pendrell Road and Drakefell Road".

Surrounding area

- 5 The surrounding area is predominately residential in nature and is comprised of a mix of buildings which were built around the 19th and 20th Centuries, all of distinctive style and form.
- 6 There are a number of schools in the area the closest being 235m away from the site – John Stainer Community Primary School.

Transport

- 7 The application site has a Public Transport Accessibility Level (PTAL) rating of 3, where on a scale of 1 to 6, 1 is the lowest and 6 is the highest.

2 RELEVANT PLANNING HISTORY

- 8 Martin's Yard has a varied planning history with a number of proposals relating to the units on site which are not relevant to this application. However, the most relevant application is as follows:
- 9 **DC/22/125969:** Installation of a telecommunication base station, consisting of a 22.5m high monopole supporting 6no antenna, 3no dishes, equipment cabinets and ancillary development at Martins Yard, 198 Drakefell Road SE4. **Withdraw upon request from applicant on 27 June 2023**

3 CURRENT PLANNING APPLICATION

3.1 THE PROPOSALS

- 10 This application relates to the submission of a Prior Approval under Part 16, Schedule 2 of the General Permitted Development Order (2015) (as amended) for the proposed installation of a 22.5m tower supporting 6 no. antennas and 3 no. dishes, with 6 no. equipment cabinets, and ancillary development thereto including meter cabinet and 2.1m

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

high palisade fenced enclosure at Skylight Roofing Centres, Martins Yard, 198 Drakefell Road SE4.

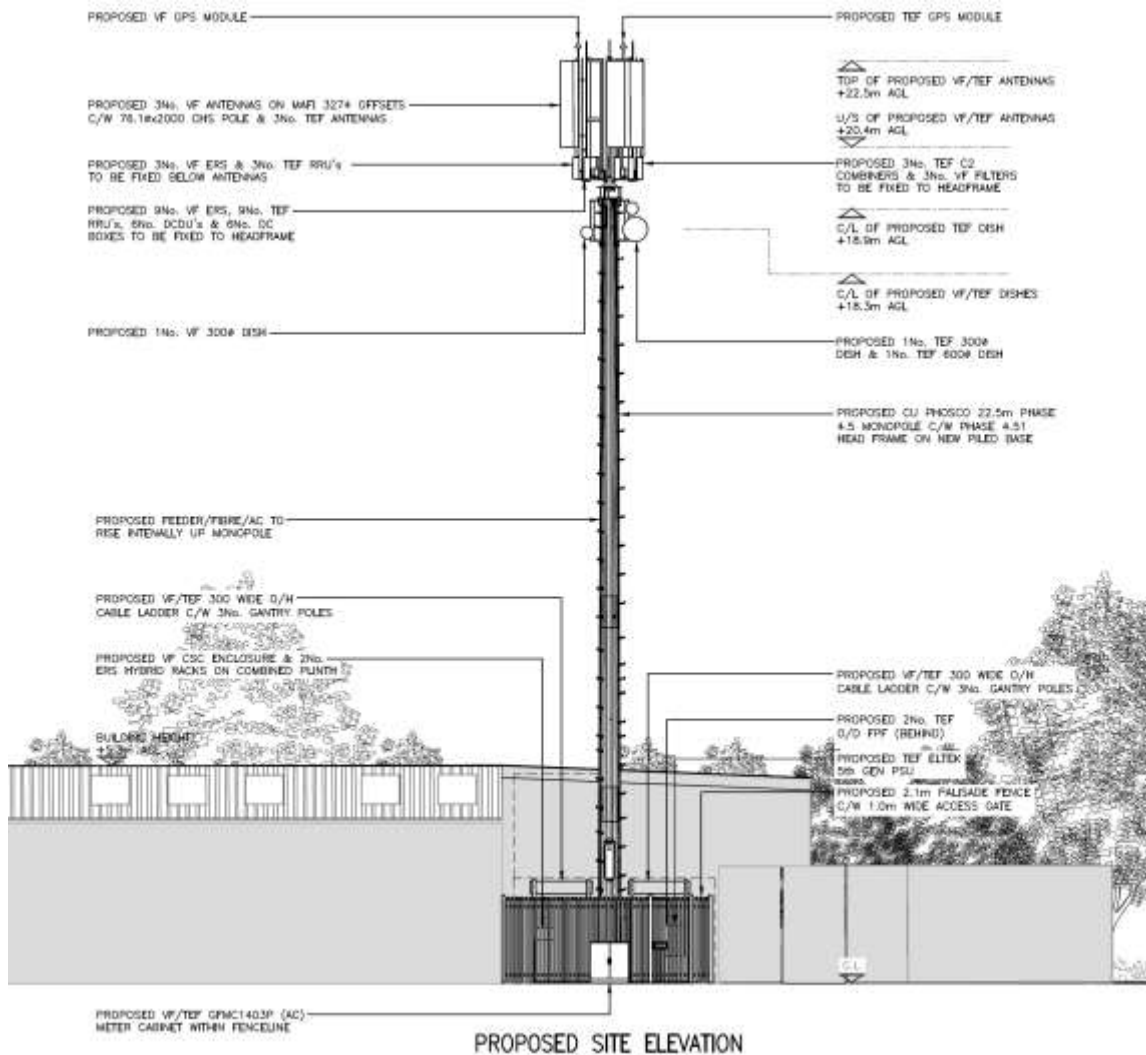


Figure 3 – proposed site elevation drawing

- 11 This prior approval application follows the withdrawal of an earlier full planning application (DC/22/125969) on 27 June 2023, which had been scheduled to be heard at Planning Committee B on 29 June 2023.
- 12 It should be noted that following the submission of the 2022 application the UK Government amended the regulations which permit electronic communications code operators' development as permitted development subject to prior approval, generally to become permissive. The most relevant change – amongst others – increased the maximum height from 20m to 25m on article 2(3) land (conservation areas). Therefore, when the previous application was submitted it was not capable of being considered under prior approval; the subsequent changes to the GPDO in March 2022 resulted in the previous scheme – and the scheme before members – meeting the amended limitations of Class A part 16 of the GPDO, subject to prior approval.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

4 CONSULTATION

4.1 PRE-APPLICATION ENGAGEMENT

13 The applicant undertook relevant pre-application consultation as per the guidance of the Code of Practice for Wireless Network Development in England (March 2022).

- Letter to London City Airport dated 15 September 2023;
- Letter to Vicky Frost MP dated 07 August 2023;
- Letter to Len Duvall AM dated 07 August 2023;
- Letter to Telegraph Hill Ward dated 07 August 2023;
- Letter to Chief Planning Officer at London Borough of Lewisham dated 07 August 2023;
- Letter to Christ the King Sixth Form dated 07 August 2023;
- Letter to Hatcham College dated 07 August 2023;
- Letter to Hatcham Temple Grove Free School dated 07 August 2023;
- Letter to Drumbeat School and ASD Service dated 07 August 2023;
- Letter to John Stainer Community Primary School dated 07 August 2023;

14 The applicant submitted a supplementary information document which outlines that no responses were received following consultation for the majority of the above consultees with the exception of the Telegraph Hill ward Councillors. It is stated that all three ward councillors objected to the proposed installation but did not give a reason for doing so to the applicant.

4.2 APPLICATION PUBLICITY

15 In accordance with para A.3 (6) of Class A, Part 16, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended (GPDO), notice was given of the application by site notices, press notice and letters.

16 Site Notice was displayed on 28 September 2023, Press Notice was issued on 27 September 2023 and letters were sent out to local residents and businesses on 26 September 2023.

17 71no responses received, comprising 67no objections, 2no support, 1no comments from an amenity society and 1 petition comprising of 114 names and addresses.

18 All three ward Councillors have also submitted objections.

4.2.1 Comments in objection

Comment	Para where addressed
Siting	
Distraction to highway users due to excessive height	Para 78
Close proximity to schools	Paras 72 to 74

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

Impact on biodiversity and wildlife	Paras 75 to 77
Appearance	
Prominent and dominant feature in the locality	Para 93
Excessive and disproportionate height	Para 89
Associated equipment cabinets would introduce clutter	Para 78
Failure to camouflage the mast into surroundings	Para 95
Impact on the wider residential character	Para 93 to 94
Overbearing nature: impact on outlook, privacy and overlooking adjacent neighbours	Para 71
Failure to preserve or enhance the character or appearance of the Telegraph Hill Conservation Area	Para 103
Alternatives	
Inaccuracies in applicants' submission relating to Forsythia House	Para 106
Insufficient evidence to demonstrate need	Para 113
Insufficient evidence to demonstrate mast sharing has been explored	Para 117
Insufficient evidence to demonstrate reasons for discounted sites	Para 113
Failure to carry out a comprehensive analysis of alternative sites	Para 113
Other matters	
Lack of equality impact assessment	Para 124

- 19 A number of non-material comments which did not relate to the siting and appearance were also raised as follows:
- 20 Impact of the proposals on the sites ability to provide future housing: Officers recognise the importance of small sites in order for Lewisham to meets its housing targets, however the application is not an allocated site. As such each application much be judged on its own merits and its impact on future housing delivery is not a material planning consideration in this application.
- 21 Societal harms of the technology: The principle of development is discussed in section 6.1, below. Officers are only able to assess the siting and appearance of the proposed development therefore this is not a material planning consideration in the determination of an application.
- 22 Excessive noise: Officers are only able to assess the siting and appearance of the proposed development therefore this is not a material planning consideration in the determination of an application.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- 23 Impact on human health (physical and mental health) from 5G: perception of health risk are not grounds to refuse this application as per para 118 of the NPPF which states local planning authorities must determine applications on planning grounds only. Additionally, they should not set health safeguards different from the International Commission guidelines for public exposure. Officers are satisfied that, on the basis of evidence submitted, the proposed telecommunications mast would meet the ICNIRP guidelines.
- 24 ICNIRP certificate is inadequate: the applicant has submitted a certificate stating that the proposal would meet the International Commission for Non-Ionising Radiation Protection (ICNIRP) Guidelines. The submission of an ICNIRP certificate is considered to be sufficient and in accordance with the NPPF and the guidance within the Code of Practice for Wireless Network Development in England (March 2022).
- 25 Impact on adjacent resident's view: established case law considers that this is not a material planning consideration in the determination of an application
- 26 Environmental and climate impact due to high electricity use: Officers are only able to assess the siting and appearance of the proposed development therefore this is not a material planning consideration in the determination of an application.
- 27 Previous applications refused in the surrounding area for roof extensions: every application is judged on its own merits and site-specific circumstances. While consistency in decision making is necessary there are clear differences between roof extensions and telecommunication masts, as such this is not a material planning consideration in the determination of an application.
- 28 Rapid technological changes could make proposed mast redundant in the future: the GPDO also makes it a condition of Class A, Part 16 that any electronic communications apparatus provided in accordance with that permission is removed from the land or building on which it is situated as soon as reasonably practicable after it is no longer required for electronic communications purposes and such land or building is restored to its condition before the development took place, or to any other condition as may be agreed in writing between the local planning authority and the developer. The GPDO also makes strong provision for the reuse of existing sites and telecommunication masts where suitable when operators are expanding their network. Officers are only able to assess the siting and appearance of the proposed development therefore this is not a material planning consideration in the determination of an application.
- 29 Impact on the value of resident's properties: established case law considers that this is not a material planning consideration in the determination of an application.
- 30 Need for 5G communications in this location: para 118 of the NPPF states that LPAs cannot question the need for an electronic communications system. It should be stated that the applicant has demonstrated as outlined in the report the need for this telecommunications system following the removal of the Forsythia House mast.

4.2.2 Procedural comments received from objectors

- 31 Insufficient consultation: a complaint was received from several objectors that the consultation period for this application was insufficient and failed to allow residents to organise themselves. The Council is satisfied that the consultation for this application has been carried out in strict accordance with the minimum statutory requirements and the Council's adopted Statement of Community Involvement. The complaint on this matter has been dealt with separately through the Council's corporate complaints procedure.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- 32 Agreement with the landowner: the applicant does not need the prior agreement of the landowner in order to submit a prior approval application. As part of procedure for applications for prior approval under para A.3 (1) (a) and A.3 (2) the developer must give notice of the proposed development any person (other than the developer) who is an owner of the land to which the development relates. The applicant has provided the relevant evidence as part of this submission that notice has been served to the owner of the application site.
- 33 Prior approval process reduces the council's powers to assess an application: prior approval applications relating to telecommunications are a legally valid route set by the Government. The Council are unable to assess the application on matters which do not relate to siting and appearance.
- 34 Role of Head of Planning in promoting the economic, social and environmental well-being of the residents of Lewisham: these objectives are key components of our development plan however we are unable to assess the application on matters which do not relate to siting and appearance
- 35 Redacted documents: the Council is required to ensure all documents submitted in support of an application are published in strict accordance with the General Data Protection Regulations 2018, as such there will be a requirement to redact certain information from documents that are public.
- 36 Gaming of the system by withdrawing of previous application prior to scheduled committee meeting: applicants have the right to withdraw applications without explanation should they wish to do so. The prior approval framework is governed by national legislation. The Council has no powers to prevent an applicant from withdrawing an application for full planning permission and resubmitting it under the prior approval framework.
- 37 Local meeting: the Council adopted an updated Statement of Community Involvement in September 2023 which removes the requirement to undertake local meetings for application which are not for Full Planning Permission/Outline and Hybrid permission.

4.2.3 Comments in support

Comment	Para where addressed
Poor connectivity in the area	Para 110

4.2.4 Telegraph Hill Society Neutral Comments

Comment	Para where addressed
Submitted views unhelpful and of a poor quality	Para 90
Detrimental impact on the views of the Conservation Area from the entry point on Avignon Road bridge	Para 93
Partially obscured from view	Para 92
Recognition that if the need is proven, the Martin's Yard site as proposed would create substantially less harm to the Telegraph Hill Conservation Area than	Para 92

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

other previously proposed sites in Telegraph Hill Conservation Area	
---	--

38 A number of non-material comments which did not relate to the siting and appearance were also raised as follows:

39 Impact of the proposals on the sites ability to provide future housing: Officers recognise the importance of small sites in order for Lewisham to meets its housing targets, however the application is not an allocated site. As such each application must be judged on its own merits and its impact on future housing delivery is not a material planning consideration in this application.

40 Impact on the value of resident’s properties: established case law considers that this is not a material planning consideration in the determination of an application.

4.2.5 Ward Councillors Comments in objections

41 The application was called in by all three ward Councillors to be decided by members of a planning committee.

Comment	Para where addressed
Negative impact on character of the area	Para 85

42 A non-material comment which did not relate to the siting and appearance was also raised as follows:

43 Negative impact on the environment: Officers are only able to assess the siting and appearance of the proposed development therefore this is not a material planning consideration in the determination of an application.

4.3 INTERNAL CONSULTATION

44 The following internal consultees were notified on 26 September 2023:

45 Conservation: raised no objections. See para 91 and 92 for further details.

5 POLICY CONTEXT

5.1 LEGISLATION

46 The provisions of Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended (GPDO) require the local planning authority to assess the proposed development solely on the basis of its siting and appearance, taking into account any representations received.

47 Part 16 of the GPDO establishes that the proposal is permitted development and therefore it is accepted in principle by virtue of the legislation.

48 Furthermore, there is no requirement to have regard to the development plan as there would be for any development requiring planning permission.

Is this report easy to understand?
 Please give us feedback so we can improve.
 Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

49 Nevertheless, the following are material considerations insofar as they relate to issues of siting and appearance.

5.2 MATERIAL CONSIDERATIONS

50 A material consideration is anything that, if taken into account, creates the real possibility that a decision-maker would reach a different conclusion to that which they would reach if they did not take it into account.

51 Whether or not a consideration is a relevant material consideration is a question of law for the courts. Decision-makers are under a duty to have regard to all applicable policy as a material consideration.

52 The weight given to a relevant material consideration is a matter of planning judgement. Matters of planning judgement are within the exclusive province of the LPA. This report sets out the weight Officers have given relevant material considerations in making their recommendation to Members. Members, as the decision-makers, are free to use their planning judgement to attribute their own weight, subject to aforementioned directions and the test of reasonableness.

5.3 NATIONAL POLICY & GUIDANCE

- National Planning Policy Framework 2023 (NPPF)
- National Planning Policy Guidance 2014 onwards (NPPG)
- National Design Guidance 2019 (NDG)

5.4 DEVELOPMENT PLAN

53 The Development Plan comprises:

- London Plan (March 2021) (LPP)
- Core Strategy (June 2011) (CSP)
- Development Management Local Plan (November 2014) (DMP)
- Site Allocations Local Plan (June 2013) (SALP)
- Lewisham Town Centre Local Plan (February 2014) (LTCP)

5.5 OTHER MATERIAL DOCUMENTS

- Telegraph Hill Conservation Area Character Appraisal (2008)
- Code of Practice for Wireless Network Development in England (March 2022) (CoP)

6 PLANNING CONSIDERATIONS

54 The only issues are:

- Whether the siting and appearance of the proposed installation is acceptable.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- Also, if any harm would occur, whether this is outweighed by the need for the installation to be sited as proposed taking into account any suitable alternatives.

6.1 PRINCIPLE OF DEVELOPMENT

General policy

- 55 The principle of development is supported, subject to the detail of siting and appearance, as established by the relevant part of the GPDO, above. The National Planning Policy Framework (NPPF), at paragraph 114, states that “advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being”. It goes on to say “...policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.”
- 56 Para 117 states applications such as this 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.

Discussion

- 57 As set out earlier in this the applicant has undertaken a number of consultations with organisations who may have an interest in this proposed development (see para 13 for consultees), no responses were received from any nearby school or college or from London City Airport.
- 58 Officers do note however that Hatcham Primary School submitted an objection due to significant opposition to the proposed development by members of the community. It stated that the school would not support the installation unless it has the support of the local community whose members attend Hatcham Free School.
- 59 The NPPF, at para 118, goes on to make clear that local planning authorities (LPAs) must determine applications on planning grounds only. It goes on to say LPAs 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.
- 60 Several objections were received which raised concerns over the proposal’s safety. However, the applicant has provided a certificate to confirm that it has been designed to comply with the guidelines published by the International Commission on Non- Ionizing Radiation Protection (ICNIRP). In these circumstances, the NPPF advises that health safeguards are not something which a decision-maker should determine. No sufficiently

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

authoritative evidence has been provided to indicate that the ICNIRP guidelines would not be complied with or that a departure from national policy would be justified. Therefore, the proposal is considered to be within the safe guidelines and there is no reason to refuse it on these grounds.

61 Officers are satisfied that the applicant has submitted the necessary evidence to demonstrate that they have explored the possibility of erecting antennas on an existing building, mast or other structure and that a statement that self-certifies that, when operational, International Commission guidelines will be met. Alternative sites have been discussed in further detail in Section 6.4.

62 Officers have checked the application otherwise meets the conditions and limitations of the Class A of Part 16 of the GPDO and that this is eligible for the prior approval pathway. A copy of this check is provided in **Appendix 1**.

6.1.1 Principle of development conclusions

63 The applicant has submitted the necessary evidence to justify the proposed development as per para 117 of the NPPF and that the proposed meets the conditions and limitations of the Class A of Part 16 of the GPDO. Therefore, Officers are satisfied that principle of development is acceptable.

6.2 SITING

Policy

64 The NPPF is a material consideration, and this includes chapter 10 on supporting high quality communications as well as elsewhere promoting sustainable transport modes and preventing an unacceptable impact on highway safety or severe residual impacts on the road network.

65 Section 72 of the of the Planning (Listed Buildings and Conservation Areas) Act 1990 gives LPAs the duty to have special regard to the desirability of preserving or enhancing the character or appearance of Conservation Areas.

66 Relevant paragraphs of Chapter 16 of the NPPF set out how LPAs should approach determining applications that relate to heritage assets. This includes giving great weight to the asset's conservation, when considering the impact of a proposed development on the significance of a designated heritage asset. Further, that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset that harm should be weighed against the public benefits of the proposal

67 CSP 7, 12, 14 and 15 and DMP 24, 30, 36 and 39 are relevant.

68 These policies seek the least detrimental visual impact and best possible environmental and operational solution for telecommunications equipment. They also set details as to how high-quality design can be achieved, encourage the use of sustainable modes of transport, seek to improve the environment for public transport users and require design to consider access to the public transport network with a particular reference to people who are less mobile and those with children, amongst other things.

Discussion

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

The proposed telecommunications mast and associated equipment would be sited within a merchant's yard formally known as Martins Yard; this yard is a private space which is used by the current tenants, Skyline Roofing Centres and their customers. The mast would be located in an area of the merchant's yard which is currently utilised for storage, Officers consider this area to be discrete due to its proximity to adjacent buildings and tall trees. The addition of a telecommunication mast and associated equipment would not be an incongruous addition within this merchant's yard given the wider context.

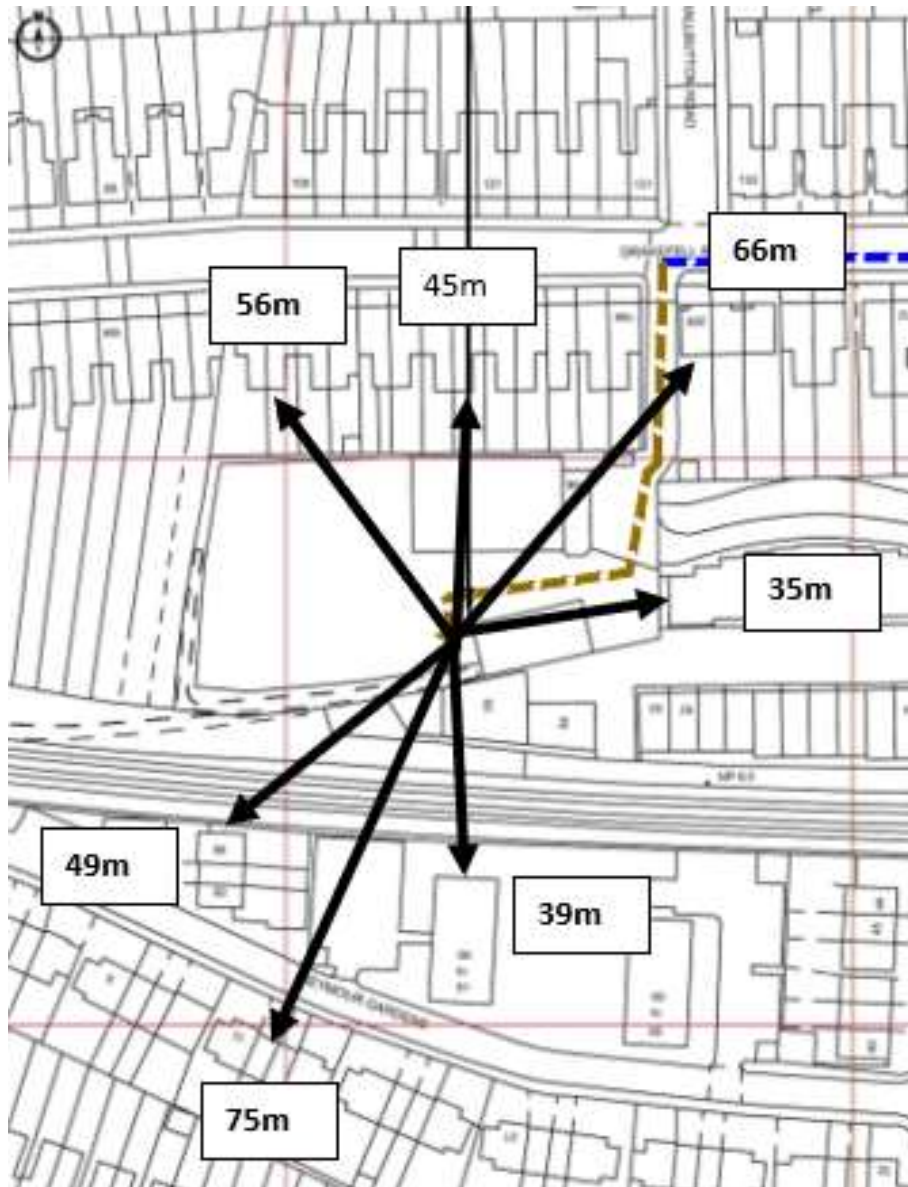


Figure 4 – map showing the distance from the application site to a number of residential properties

The nearest residential property is circa 35m from the proposed site, at the end of Dragonfly Place, this is a sufficient distance to prevent any impact on neighbouring amenity in terms of sense of enclosure and overbearing impact. The distance to properties along Seymour Gardens, to the south of the site beyond the railway line, range from 39m to 75m. Officers are satisfied that the proposed mast would have not have any impact on the residents of Seymour Gardens in terms of overbearing structure or a sense of enclosure from the siting of the mast.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- 71 While objectors raised concerns it would reduce outlook and impact on their privacy this is not substantiated by the evidence before Officers: the telecommunications mast of 22.5m is unlike a residential building of similar height due to its narrow profile, therefore it would not reduce adjacent properties outlook. There would also be no impact in terms of privacy when in operation; any loss of privacy when under construction and during period of maintenance when operators may have to climb the mast is likely to be limited to short periods of time and the distances shown in Fig 4 far exceed the usual standards of 21m for facing habitable rooms (para 2.250 of the supporting text for DMP32). There is unlikely to be any impacts on privacy as a result of the proposed siting of the mast.
- 72 Some local residents were concerned that the proposed development would be in close proximity to a number of schools within the local area; the nearest school would be John Stainer Community Primary School which is circa 160m (as the crow flies). It is not uncommon for a dense urban area such as this to have telecommunications masts and equipment within the catchment area of schools and colleges. There is no reason to believe that the application site would present any increased risks to school children.
- 73 Nevertheless, the government's code of practice (CoP) for wireless network development in England states, "Where it is proposed to install, alter or replace a base station in the vicinity of a school or college, operators should discuss the proposed development with the relevant body of the school or college before submitting an application to the local planning authority." On this occasion the applicant has submitted consultation letters to a number of local schools as outlined in para 13 during the pre-application engagement but received no response to this consultation. While the CoP encourages discussion with the relevant body of the school or college before submitting an application, the minimum requirement is for the operator to send a consultation letter or email to the school or college and allow 14 days for consultation.
- 74 The code includes no mention of minimum distances between the site of a 5G mast and location of schools. However, the code does refer to recommendations from the body International Commission on Non-Ionizing Radiation Protection, or ICNIRP, which in its online resources suggest that the higher the mast antennae, the better for those living or working, or at school, nearby. As already discussed, the applicant has satisfied the requirement to submit a ICNIRP certificate.
- 75 The proposal development would be located adjacent to the railway line which runs to the south of the application site. The mast and associated equipment would be installed on the northern side of the railway line, approximately 280m west of Brockley railway station and 750m east of Nunhead Railway Station. Both sides of the railway embankment in the vicinity, contain trees and other vegetation and forms part of the Nunhead Cutting SINC (Site of Importance for Nature Conservation) and green corridor which are designated in the Lewisham Local Plan Policy map.
- 76 CSP 7 seeks to protect SINC's and open space, while CSP 12 seeks to preserve or enhance the local biodiversity and geological conservation interests by designating SINC's. DMP 24 requires all new development to take full account of biodiversity and geodiversity in development design, ensuring the delivery of benefits and minimising of potential impacts on biodiversity and geodiversity. It goes on to require, where necessary, surveys prepared, by a suitably qualified ecologist registered with the Chartered Institute of Ecology and Environmental Management (CIEEM), during an optimal time and to contain the appropriate degree of detail needed to identify and consider existing biodiversity interests and possible impacts on them.
- 77 Due to the scale and nature of the development, this is not a case where Officers consider it is necessary to carry out such surveys. The nature of the works means local

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

biodiversity is likely to be preserved given the development would not be located within the SINC or green corridor but within a merchant's yard which is of a light industrial nature.

78 Given the proposed mast is located within the yard of the roofing materials company and not alongside a footpath or highway, there would be no impacts in terms of pedestrian safety or highway safety. Due to the proposed location any associated cabinets and equipment would not add any street clutter, in contradiction to some objector's concerns. Some objections raised concerns that the proposed height of the mast would cause a distraction to highway users, Officers disagree with this assertion, and it is likely that once installed the mast would blend into the skyline and not be a distraction to passing highway users.

6.2.1 SITING CONCLUSION

79 Officers are satisfied that the proposed siting of the mast is in a location that has the least visual and highway impacts possible and consider the proposed mast and associated equipment acceptable in terms of its siting.

6.3 APPEARANCE

Policy

80 Section 72 of the of the Planning (Listed Buildings and Conservation Areas) Act 1990 gives LPAs the duty to have special regard to the desirability of preserving or enhancing the character or appearance of Conservation Areas.

81 Relevant paragraphs of Chapter 16 of the NPPF set out how LPAs should approach determining applications that relate to heritage assets. This includes giving great weight to the asset's conservation, when considering the impact of a proposed development on the significance of a designated heritage asset. Further, that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset that harm should be weighed against the public benefits of the proposal

82 The NPPF is a material consideration, and this includes chapter 10 on supporting high quality communications as well as elsewhere promoting the creation of well-designed places.

83 CSP 15 and DMP 30, 36 and 39 are relevant.

84 These policies seek the least detrimental visual impact and best possible environmental and operational solution for telecommunications equipment. They also set details as to how high-quality design can be achieved, and encourage the use of design that minimises the size of or camouflages equipment.

Discussion

85 The proposed mast would have a height of 22.5m which is a similar height to other 5G masts that have been deployed in Lewisham. The height is taller than previous generation of 4G masts, which are typically between 12.5 and 15m throughout Lewisham. A recent change (March 2022) in legislation has relaxed the height limits for permitted development and thresholds for the prior approval process. Therefore, while this is taller than many of those currently in the area, a height of up to 25m within a conservation area will likely become more typical as 5G is deployed. Objectors and

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

Ward Councillors also raised concerns that the proposed mast would be out of character for a conservation area; however, there are several existing telecommunication masts located within and outside of the conservation areas within Lewisham and such it is not an uncommon feature.

86 In the document accompanying the application, titled “Supplementary Information”, the applicant has sought to justify the proposal with reference to three appeal decisions relating to cases in the London Borough of Havering, Winchester and Birmingham. While these appeal decisions are noteworthy, they are not afforded weight in the assessment of this application since they relate to sites that are in different areas to the above application site. Furthermore, the circumstances are materially different since those cases do not relate to developments within a conservation area.

87 Similarly, some objections sought to bring to attention of Officers more relevant recent appeal decisions which both relate to sites located within conservation areas in the borough of Lewisham (DC/19/111868 and DC/21/120156). These too are not afforded weight in the assessment of this application as they relate to sites that are in a much more prominent position and were more visible in relation to the heritage assets. Those decisions also pre-date the changes to the GPDO in March 2022 which allowed for masts of up to 25m within a conservation area.

88 The tower would be galvanised, which would help it to blend in with the surrounding area and skyline; Officers recommend a condition be imposed to ensure the mast would retain a sky-grey colour. Officers also note that intervening buildings and trees will help screen the lower and middle parts of the proposal, and from some perspectives form a backdrop.

89 Local residents have raised concerns that the applicant is relying upon existing trees to mitigate the excessive height of the mast, as those trees are not permanent features the mitigation they provide by screening the mast should not, in Officers’ opinion, be attributed significant weight. It is acknowledged that the trees are not permanent features within the landscape and may die or be lopped in the future, as such limited weight is given to the screening provided by the existing trees. Officers consider that while the trees do not necessarily provide screening, rather they provide a backdrop to which the mast would be visible against that helps to reduce their prominence in the skyline from certain viewpoints.

90 Residents and the Telegraph Hill Society also raised concerns over the accuracy of the section drawings which demonstrate the visibility of the proposal. Officers sought clarification on the submitted drawings from the applicant who advised that the drawings were completed by a suitably qualified architect and the height of the trees were obtained using an inclinometer. Nevertheless, those drawings do not show in all circumstances that the trees would provide screening as outlined below. Officers do not consider the height of the trees to be determinative. Some screening would provide some benefits however, in the opinion of Officers, such screening is not necessary.

91 While the 22.5m mast and antennas would be visible, Officers consider it would only have a minor visual impact to the surrounding area. During the previous application (DC/22/125969) Conservation Officers requested additional drawings to demonstrate the visibility from a number of locations:

- Walbutton Road – view would be blocked by the houses on Drakefell Road
- Roundabout on Avignon/Drakefell Roads – the view would be blocked by trees on Drakefell Road but in winter the pole would be visible above the roofs

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- Seymour Gardens – view would be blocked by houses
- Bridge over railway on Avignon Road – view would be blocked by trees – there may be some visibility in winter

- 92 Conservation Officers consider that the mast would be most visible from the windows and amenity spaces of properties to the immediate west and south of the site. As mentioned above, while Officers do not consider this screening to be determinative, mature trees would/could screen it to some extent at some times of year. The Telegraph Hill Society submitted neutral comments to the Council in relation to the proposed development: they recognised that while the mast would be more visible from some locations it would likely be that the location would have substantially less harm to the Telegraph Hill Conservation Area than other recently proposed sites; an opinion which is also shared by the Council. It is clear from the drawings that the mast would be blocked in a number of locations by existing buildings, only in a small number of locations would it be more prominent.
- 93 Some objections raised concerns that the proposed development would unacceptably be a prominent and dominating feature within the skyline. The proposed development, by its very nature as a telecommunications mast, is a visible form of development which can have an impact upon the established skyline. While the Telegraph Hill Society raised concerns that the visibility of the mast from the bridge over railway on Avignon Road would be detrimental to the entry into the conservation area, the mast would be more obscured from other key locations within the conservation areas by existing buildings. As such the visual harm arising from this location would be limited to the bridge over the railway line with regards to the conservation area; the bridge is also at an elevated level to the application site. Together with the established trees it would assist in obscuring the height and mass of the monopole in long range views, even accounting for seasonal cover changes. The mast would thus not unduly break the skyline or impact on openness or appreciation of the conservation area.
- 94 It is recognised that the proposed mast would be more visible from Seymour Gardens than from other public viewpoints, albeit from some distance, however this visual impact is considered to be acceptable given the circumstances discussed above, particularly the distances between the site and Seymour Gardens. Nevertheless, were Members to conclude some harmful visual impact would arise, Officers would recommend that be outweighed by the substantial public benefit arising from the provision of 5G services in Lewisham and the wider economic and community benefits the 5G rollout would have. Officers also recognise the importance of reliable access to mobile broadband and services for those who are from a disadvantaged or low-income household, for whom mobile broadband can be their only access to the internet.
- 95 An objection was received regarding the design of the proposed mast and queried why camouflage design solutions have not been utilised; it is understood that due to the scale and technological constraints of 5G equipment, previous camouflage design solutions, such as tree mast designs and concealing antennas in flagpoles, are not practicable or suitable. As such simple designs with particular attention to colouration and finishes would help reduce visual impacts.
- 96 NPPF para 115 states that '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'. DM Policy 39 emphasizes that the proposed development seeks to ensure that new telecommunications infrastructure is sited appropriately. While the mast would be 22.5m high, it would be located a significant distance from either neighbouring residential

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

properties and public realm, while its grey colour would help it to blend into the skyline. There would be a degree of screening from existing buildings, and to a lesser extent, adjacent trees. This, combined with the character of Martin's Yard as light industrial in nature, means its utilitarian appearance would not have an adverse impact on the character of the wider area.

- 97 The proposed base station equipment and fencing would be located within the merchant yard as such there would be no visual impact resulting from this part of the development. The base station cabinets would be green and grey in order to further assimilate into the surrounding environment. The cabinets would be located within the site compound, screened behind the 2.1m palisade fence and designed to appear like other statutory undertakers' equipment cabinets that can be found in an urban area.
- 98 While other sites in Telegraph Hill Conservation Area were discounted due to the impact on the conservation area, the proposed site is considered to have the least visual impact, being located adjacent to the boundary, the railway corridor and one of the few areas not immediately adjacent to residential properties.
- 99 Turning specifically to the impact on the Conservation Area, the above considerations lead Officers to conclude that the current proposal would lead to the very low end of less than substantial harm to the Telegraph Conservation Area.
- 100 Paragraph 199 of the NPPF requires great weight to be given to the asset's conservation while para 202 requires harm to be weighed against any public benefits of the proposal. The applicant has provided substantive evidence of the wider public benefits of the proposal. The applicants have detailed their sequential test for choosing this site and advised that they have had regard to minimising proliferation of masts as well as minimising the height to what is operationally necessary.
- 101 The proposed telecommunications mast would support the roll out of 5G network in Lewisham which will bring economic benefits and improve Lewisham's residents' access to superfast mobile internet. Officers consider that this provides clear and convincing justification for the harm in this location. Officers conclude the public benefits, including the economic and social benefits of upgrading electronic communication infrastructure, to be significant and to outweigh the less than substantial harm identified above.

6.3.1 APPEARANCE CONCLUSION

- 102 The mast height and design are appropriate in the context of the relatively remote siting of the mast, the character of the surrounding area and the presence of existing buildings and, to a lesser extent, adjacent trees. Whilst the proposal would result in less than substantial harm to the conservation area, this would not amount to a serious adverse impact on the character or appearance of the area and, in accordance with the balancing exercise required by para 202 of the NPPF, there are wider public benefits which outweigh the harm identified.
- 103 Officers, having regard to the statutory duties in respect of Conservation Areas in the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant paragraphs in the NPPF in relation to conserving the historic environment, are satisfied the proposal would preserve the character or appearance of Telegraph Hill Conservation Area.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

6.4 ALTERNATIVES

- 104 Para 117 of NPPF is a material consideration, and this includes section (c) which requires evidence be provided that the applicant has explored alternatives.
- 105 DM Policy 39 reflects the provisions of para 117 of the NPPF and also requires evidence is submitted to demonstrate that alternative sites have been considered and discounted before choosing the application site.

Discussion

- 106 The supplementary information document states that the site was chosen as it is the nearest suitable site to the previous installation at Forsythia House which had to be removed in 2019 following a Judicial Review. It appears there are some inaccuracies in the submission as the applicant makes reference to the removal of the Forsythia House installation both in the past and future tense; Officers are satisfied that this has been removed. The applicant has outlined that upgrading existing sites would not fill the connectivity gap left by the removal of Forsythia House, therefore a shared replacement is required. The area within which a shared installation needs to be established in order to reinstate the coverage and capacity requirement is constrained by the location and extent of the coverage and capacity provided by the previous installation.
- 107 As illustrated in images 4 and 7 (pages 12 and 13) within the applicants Supplementary Information document the level of coverage on Vodafone and Virgin Media O2 network provided currently to this area of Brockley is relatively poor. Existing installations provide indoor urban and indoor suburban signal levels and in car only; whereas this area of London requires indoor dense urban and dense urban/urban level.
- 108 The applicant has suggested that the removal of Forsythia House has reduced the quality of the coverage in this area, this is not an assertion that is substantiated with coverage maps before the removal in order to do a direct comparison. Nevertheless, Officers are able to see clearly from images 4 and 7 (pages 12 and 13) within the applicant's Supplementary Information document that the coverage quality at the application site and surrounding area is not the highest level. Therefore, the proposed shared installation for the Vodafone and Virgin Media O2 network would improve this coverage as illustrated in images 5 and 8 to indoor dense urban and dense urban/urban level.
- 109 It is suggested that without this shared replacement installation, existing radio base stations in the area will continue to be detrimentally affected as they continue to try to serve a much larger demand. The result would continue to be constant data buffering and dropped calls to the surrounding area, to the detriment of locals, businesses, students and visitors to the area. According to the applicant it is likely coverage is worse than the coverage maps show as the maps do not take into account of those issues as described above.
- 110 Officers are satisfied that it has been demonstrated that in order to provide equivalent replacement coverage and capacity, the replacement site needs to be as close as possible to the previous site, so it can fill the specific hole in coverage and capacity in the operators' networks. The proposed shared site would reinstate connectivity to the area at a local level for both operators' national networks. This is further demonstrated by letters of support which suggests some residents often suffer with poor connection and speeds in this area.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>



Figure 5 - map showing the location of Alternative Sites (Source: Supplementary Information)

- 111 Within the Supplementary Information document, the applicant has set out in the table located in Section 5 (pages 15 to 22) of the document details and reasons for the 20 alternative sites that have been discounted. The alternative sites have been discounted for a number of reasons such as: the impact on the Telegraph Hill Conservation Area, location being on low ground, unable to deliver the required level of coverage to the target area, the presence of pitched roofs which are unsuitable and insufficient space. Figure 5 above shows the location of the sites that the applicant has discounted with red dots and the application site with a yellow dot.
- 112 Following the previous application, the applicant considered a number of additional alternative sites which were raised through objections and local meeting questions of the previous application DC/22/125969) such as Telegraph Hill Upper Park, Nunhead Forest, Nunhead Reservoir, Beechcroft Reservoir. These additional alternatives sites would either be located in a more prominent location in the conservation area or duplicate existing coverage rather than replacing the coverage lost following the removal of Forsythia House.
- 113 Concerns were raised by objectors that other alternative sites would be more suitable and that the insufficient evidence to demonstrate need, comprehensive analysis of alternative sites and reasons for discounting them had been provided. The applicant has provided sufficient evidence to demonstrate that they have explored the possibility of

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

erecting antennas on an existing building, mast or other structures in the local area as required by policy.

- 114 Para 27 of the Code of Practice further considers that in general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations.
- 115 Given the proposed is not considered unacceptable, Officers are satisfied that the submitted information and evidence is sufficient to demonstrate that there is no alternative site available which would provide the required coverage and capacity within the local area following the removal of the existing site at Forsythia House (VF_86161).
- 116 Officers also recognise that the proposed location, and the design of the development, were chosen on the basis of a number of factors with the aim of limiting any potential impacts of the scheme. The application site would be shared by two operators and, based on the evidence submitted, Officers are satisfied that the proposed development is the minimum necessary to meet the requirements of the operators and to ensure effective coverage within this context.
- 117 Concerns were also raised about whether the applicant has explored mast sharing on existing masts; as previously explained in para 110 there is a need for any replacement mast to be as close as reasonably possible to Forsythia House; notwithstanding that issue, the proposed mast would be a shared mast between Virgin Media O2 and Vodafone. Therefore, the proposed shared mast reduces the need for two separate masts elsewhere in the local area, given the application site is in a less prominent location in the conservation area – as commented by Telegraph Hill Society – any other alternative location for two separate masts would likely be more noticeable within the conservation area. The use of a shared mast addresses some of the concerns raised by objectors regarding the proliferation of these masts in the area.

6.4.1 ALTERNATIVES CONCLUSION

- 118 Officers are satisfied that the applicant has provide sufficient and robust evidence which demonstrates that the application site is the most suitable to provide the network coverage following the removal of the existing site at Forsythia House.

7 EQUALITIES CONSIDERATIONS

- 119 The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 120 In summary, the Council must, in the exercise of its function, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
 - advance equality of opportunity between people who share a protected characteristic and those who do not;
 - foster good relations between people who share a protected characteristic and persons who do not share it.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- 121 The duty continues to be a “have regard duty”, and the weight to be attached to it is a matter for the decision maker, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 122 The Equality and Human Rights Commission has recently issued updated Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to statutory guidance issued which can be found on: <https://www.equalityhumanrights.com/guidance/public-sector-equality-duty>
- 123 The planning issues set out above do not include any factors that relate specifically to any of the equalities categories set out in the Act, and therefore it has been concluded that there is no impact on equality.
- 124 There were objections received which were concerned with the lack of equality impact assessment with regards to this application. Officers are satisfied that this is not required as part of this application as by law planning applications must be determined in accordance with the Development Plan and other relevant material planning considerations. An Equalities Analysis Assessment was undertaken when preparing the adopted Development Management Local Plan which was used to assess the approved development. An equality impact assessment is not required for individual applications.

8 HUMAN RIGHTS IMPLICATIONS

- 125 In determining this application the Council is required to have regard to the provisions of the Human Rights Act 1998. Section 6 of the Human Rights Act 1998 prohibits authorities (including the Council as local planning authority) from acting in a way which is incompatible with the European Convention on Human Rights. “Convention” here means the European Convention on Human Rights, certain parts of which were incorporated into English law under the Human Rights Act 1998. Various Convention rights are likely to be relevant including:
- Article 8: Respect for your private and family life, home and correspondence
 - Protocol 1, Article 1: Right to peaceful enjoyment of your property
 - Protocol 1, Article 2: Right to education
- 126 This report has outlined the consultation that has been undertaken on the planning application and the opportunities for people to make representations to the Council as Local Planning Authority.
- 127 Members need to satisfy themselves that the potential adverse amenity impacts are acceptable and that any potential interference with the above Convention Rights will be legitimate and justified. Both public and private interests are to be taken into account in the exercise of the Local Planning Authority’s powers and duties. Any interference with a Convention right must be necessary and proportionate. Members must, therefore, carefully consider the balance to be struck between individual rights and the wider public interest.
- 128 This application has the legitimate aim of providing additional coverage and 5G capacity the surrounding area following the removal of rooftop mast at Forsythia House. The rights potentially engaged by this application, including Article 8, Protocol 1, Article 1 and Protocol 1, Article 2 are not considered to be unlawfully interfered with by this proposal.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

9 CONCLUSION

129 This application has been considered in the light of the limitations and conditions of Part 16, Class A of the GPDO (2015) (as amended) and policies as set out in the development plan and other material considerations.

130 Officers are satisfied that the proposed shared replacement telecommunications tower and equipment cabinets comply with Part 16, Class of the GPDO and with the objectives of the NPPF and Development Plan policies, taking into account other relevant planning considerations. Government guidance states that in order to limit visual intrusion the number of radio and telecommunication masts and the sites should be kept to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures have been explored and discounted and the need for a new site has been adequately justified. Paragraph 112 of the NPPF encourages the provision of 5G infrastructure in order to support economic growth and social well-being through the increased connectivity that 5G will provide, including home working, connected transport and smart city applications. Central Government is also supportive of the provision of 5G network infrastructure.

131 Officers have identified that the siting and appearance of the proposal would cause no harm in the context of the wider area but less than substantial harm, at the very low end, to the Conservation Area. Due to the proposed location of the development, its wider context and the presence of intervening screening, Officers found this harm to the heritage asset to be relatively localised. This would not amount to a serious adverse impact on the character or appearance of the area.

132 Officers recognise the weight to be given to impacts on heritage assets, set out in para 199 of the NPPF, and have carried out the balancing exercise required by para 202 and conclude that there is a clear need for the development in this location in order to sustain and enhance communications infrastructure within the area. The evidence before Officers indicates that there is a lack of reasonable alternative sites within the area which would provide the required coverage. Officers are also convinced that, should the proposal not go ahead, and the Forsythia House mast not replaced, the quality of communications services within the area would be seriously deficient. Officers also recognise the significant benefits associated with improved communications infrastructure within the area.

133 Officers have given careful regard to all of the above considerations. Consequently, in the view of Officers, and with regard to the specific circumstances which are present in this case, the significant public benefits arising from the provision of 5G services of this scheme would outweigh the less than substantial harm which would be caused to the setting of the conservation area.

10 RECOMMENDATION

134 That the Committee resolve to **GRANT** prior approval subject to the following conditions and informatives:

10.1 CONDITIONS

- 1) **Materials**

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- (a) The hereby approved mast when it is constructed shall be coloured sky-grey and shall be retained as such for the lifetime of the development.
- (b) The scheme shall be carried out in full accordance with those details, as approved.

Reason: To ensure that the design is delivered in accordance with the details submitted and assessed so that the development achieves the necessary high standard and detailing in accordance with Policies 15 and 16 of the Core Strategy (June 2011) and DM Policies 30 and 36 of the Development Management Local Plan (November 2014)

10.2 INFORMATIVES

- 1) Any planning permission granted under Article 3(1) and Schedule 2, Part 16, Class A is subject to conditions set out in Paragraphs A.3(9), A.3(11) and A.2(2), which specify that the development must, except to the extent that the local planning authority otherwise agree in writing, be carried out in accordance with the details submitted with the application, must begin not later than the expiration of 5 years beginning with the date on which the local planning authority received the application, and must be removed as soon as reasonably practicable after it is no longer required for electronic communications purposes and the land restored to its condition before the development took place.

11 BACKGROUND PAPERS

- 135 Submission Drawings
- 136 Submission technical reports and supporting documents
- 137 Internal consultee responses

12 REPORT AUTHOR AND CONTACT

- 138 Thomas Simnett Thomas.simnett@lewisham.gov.uk 020 8314 6284 (ext. 46284)

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>