

Our Ref: LUM0011 – Cromwell Tower

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Solutions for New Technologies

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14/12/2023

FULL PLANNING APPLICATION & LISTED BUILDING CONSENT FOR THE INSTALLATION OF ELECTRONIC COMMUNICATIONS EQUIPMENT AT CROMWELL TOWER, LONDON, W1F 7EH (NGR: E532422, N181901)

Dear Sir or Madam,

We write on behalf of Luminet Solutions Ltd to make a full planning application, and an application seeking Listed Building Consent, for the proposed installation of electronic communications equipment at the above location. The application seeks permission for the development of:

The installation of 92 no. small antennas attached to new supporting steelwork, plus development ancillary thereto, all contained within new GRP-shrouding, upon the rooftop of the building.

The application and enclosures have been submitted on the Planning Portal comprises the following:

- Planning Application Forms and Certificates.
- Prescribed fee - £578 (Paid electronically via Planning Portal on submission);
- Supplemental drawings: Site Location Plan; Existing Roof Plan; Existing Elevation Plan; Proposed Roof Plan; & Proposed Elevation Plan;
- ICNIRP Certificate;
- Supporting Planning Statement (below).

We hope that the enclosed documentation is acceptable to determine the application. Should you require further information or have any questions please contact me at the details at the top of this letter.

Yours sincerely,

Nick Allan

Solutions30 on behalf of Luminet Solutions Ltd.

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Proposal Overview

Location of Proposal

Site Name & Reference	Cromwell Tower
Postal Address	Cromwell Tower, London, W1F 7EH
National Grid Reference (NGR)	E532422, N181901
Description of Development	The installation of 92 no. small antennas attached to new supporting steelwork, plus development ancillary thereto, all contained within new GRP-shrouding, upon the rooftop of the building.



Figure 1. Cromwell Tower (Source: GoogleMaps)

Design & Access Statement

Design

The installation of 92 no. small antennas attached to new supporting steelwork, plus development ancillary thereto, all contained within new GRP-shrouding, upon the rooftop of the building.

The proposal is on behalf of Luminet Solutions Ltd.

The proposed apparatus will enable line-of-sight wireless internet connection between local buildings within the area. This is considered preferable to the digging and laying of new fibre cables in the ground. The proposal allows for the wireless connection of fibre-quality internet between short-range buildings.

The rooftop at Cromwell Tower measures 123m in height. The proposed development has been designed to sit within GRP-shrouding to ensure that any visual impact of the scheme is reduced the maximum effect. It is not anticipated that the proposed shrouding will be visible from ground-level, as it is purposely designed to be set-back from the roof-edge. Whilst the shrouding it may be visible from neighbouring towers within the immediate vicinity, the shrouding is likely to be viewed as part of the building, rather than an identifiable telecommunications installation. As such, it is considered that the scheme offers a wholly appropriate solution for both the building and the local area, with the visual impact of the scheme being negligible, and certainly not outweighing the benefits which will be brought forward as part of the scheme.

Due to the nature of the technology, which uses direct line-of-sight to achieve connection, high buildings are preferable as this eliminates the possibility of interference from existing infrastructure. The rooftop at Cromwell Tower offers an ideal location to accommodate the necessary apparatus.

Access

Due to the nature of the proposed development, access to the site will only be required during the initial installation, and for maintenance purposes thereafter.

Access and egress to the rooftop is already provided through existing routes and building management. The site is currently in use for other telecoms equipment and this site will follow similar access controls.

The site is not public facing and access cannot be gained by the public.

Proposed Equipment

Equipment Overview

For clarity, the proposed equipment is not based on 4G/5G or Wi-Fi protocols.

The proposed equipment meets all the legal and technical standards for telecommunications equipment within the UK and has been successfully rolled-out across a number of London Boroughs, and, on a wider-scale, across the UK.

Due to the nature of the technology, the antenna system requires line-of-site connection. The proposed equipment has been reduced to the minimum level to adequately provide its intended service. The provision of a high-quality internet connection is the sole purpose of this equipment. Furthermore, all necessary steps have been taken to minimise the visual impact of the scheme, namely the proposed installation of GRP-shrouding in which the apparatus will sit. As such, any achievable views of the rooftop will simply associate this shrouding as part of the building itself, in a similar fashion to both the upper- and lower-roof levels of Cromwell Tower.

Siting & Appearance

Siting

Cromwell Tower measures 123m in height and sits within The Barbican Grade II* Listed Park and Garden (List Entry Number: 1001668), which covers an area of circa 15ha, and is situated in a densely built-up area in the City of London. Within The Barbican itself, which is a largely residential estate, sit 2113 flats, maisonettes, and terraced houses, plus a number of communal buildings including the Arts Centre, the Guildhall School of Music and Drama, the City of London School for Girls (all Listed Grade II), and St Giles' Church (Listed Grade I). In the far northern part of The Barbican stand three 125m-high triangular residential tower blocks: Lauderdale Tower, Shakespeare Tower, and Cromwell Tower.

Cromwell Tower itself, measuring circa 125m, will provide excellent line-of-sight opportunities across the wider area, enabling connections to other Luminet sites which are already in situ across London.

Given the Listed status of Cromwell Tower, every step has been taken to reduce the visual impact of the proposed apparatus on the rooftop, as far as practicable, with the proposed deployment GRP-shrouding. All associated telecommunications apparatus has been designed to sit within this GRP-shrouding. As such, the visual impact on the rooftop, and the building itself, is considered negligible, as the GRP-shrouding will allow the telecommunications to be effectively deployed on the building rooftop

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whilst creating the appearance of a small building extension on the 123m-high tower. This type of extension on a residential tower within London is not unusual.

When the balanced assessment of public benefits vs harm, which is advocated within the NPPF, is undertaken, it is considered that, in this instance, the public benefits outweigh harm and any associated visual impact. It is considered that this is wholly due to the installation of the GRP-shrouding on the rooftop itself. As the high-rise buildings continue to grow within London, a 3.2m-high increase on a 123m-high tower is not considered to be out of the ordinary, but rather wholly appropriate for the times in which we now live.

The GRP-shrouding has been specifically designed on the rooftop to ensure that it is set-back from the roof-edge, and therefore not visible from ground-level, further reinforcing the Applicant's opinion that this rooftop offers the best town planning and environmental solution to achieving high-quality communications networks, which is the general aim of Central Government and something which is encouraged within the London Plan (March 2021) and the NPPF.

Appearance

The antennas themselves are small and will be mounted directly onto new supporting steelwork, positioned on the Upper Roof Level. The scale of the equipment is minimal when compared to the overall size of the building (123m). However, none of proposed apparatus will be visible on the rooftop, due to the proposed deployment of GRP-shrouding, which will contain all of the apparatus. This GRP-shrouding will assimilate with the building itself, designed to look more like a plant room, of which there are many on London's high-rise tower blocks, rather than look like a telecommunications site. The positioning of the GRP-shrouding, on the Upper Roof Level, and set-back from the roof-edge, will ensure that the visibility of the GRP-shrouding will be minimised as far as practicable.

Where views are achieved, from neighbouring tower blocks, the GRP-shrouding will portray the appearance of the existing building, rather than a separate entity such as a new telecommunications installation. The proposed development is therefor considered appropriate for deployment on the building, within The Barbican, and within the wider City of London-setting.

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Heritage and Conservation

Conservation Areas and Listed Buildings

As outlined above, Cromwell Tower sits within the Grade II* Listed Barbican. The Barbican (shaded green) is shown in Figure 2 below. Cromwell Tower is represented by a blue star.

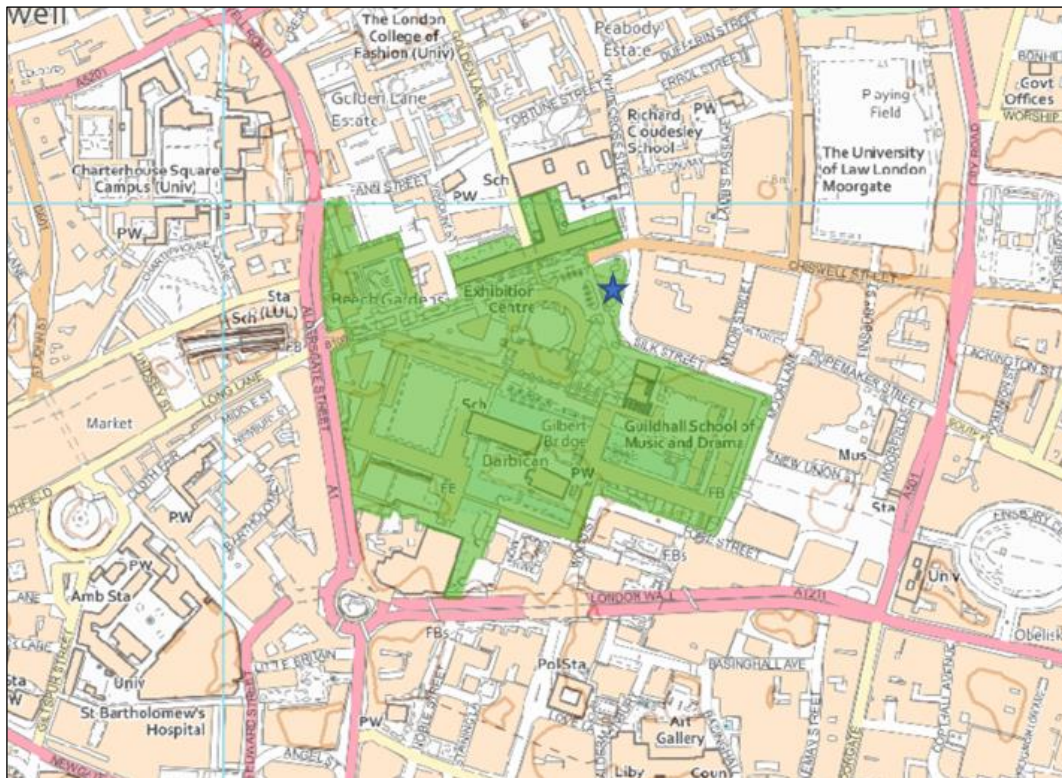


Figure 2 – The Barbican and Cromwell Tower (Source: historicengland.org.uk)

There are a multitude of Listed Buildings, mostly Grade II, situated to the east of Cromwell Tower, in an around Silk Street and Chiswell Street. Despite its positioning within The Barbican, and its close proximity to other nearby heritage assets, the sheer size and scale of Cromwell Tower must be acknowledged by the Local Planning Authority. As can be seen in Figure 3, below, Cromwell Tower dwarves most buildings within the immediate area. The question must then be posed as to what the level of impact a relatively small area of GRP-shrouding on the Upper Roof Level of a 123m-high building would cause to a) Cromwell Tower itself; b) the heritage asset that is The Barbican; and c) to the wider London skyline. The Applicants would argue that the impacts on all three are negligible, and highly unlikely to be even recognised from ground-level, within The Barbican, or from other neighbouring tower blocks. Given the height increase measures 3.2m, and is restricted to only a small area in the

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centre of the Upper Roof Level of the building, it is considered that the proposed development offers a viable, realistic and wholly appropriate town planning and environmental solution for Cromwell Tower.

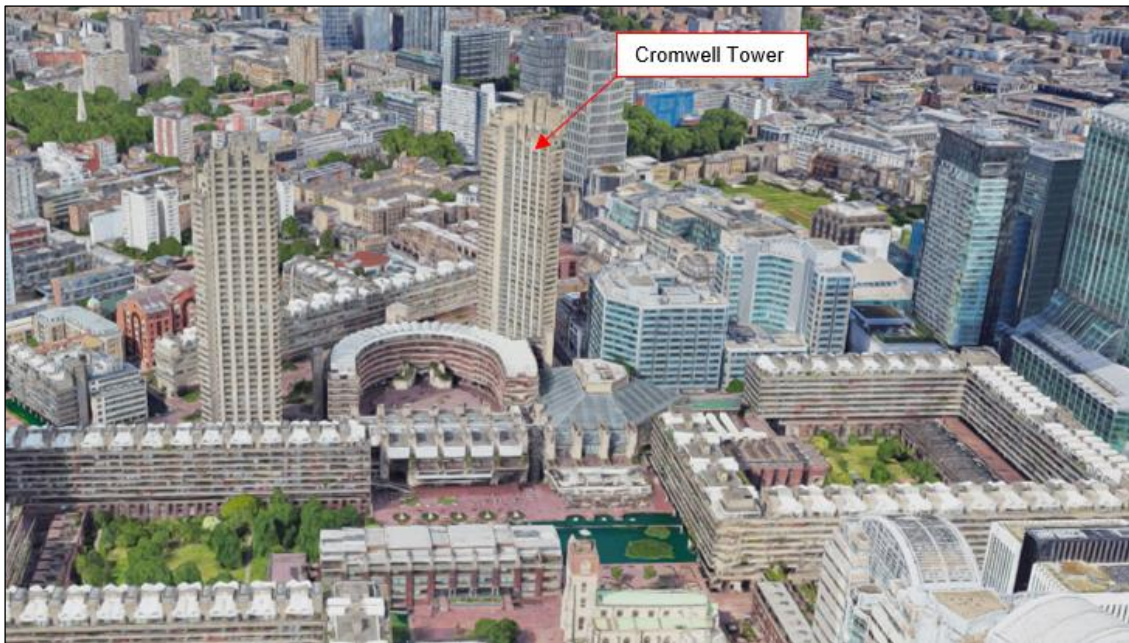


Figure 3 – Cromwell Tower and the surrounding skyline (Source: GoogleMaps3D)

The question that must therefore be posed; is what level of impact would a relatively small area of GRP-shrouding on the Upper Roof Level of a 123m-high building cause to a) Cromwell Tower itself; b) the heritage asset that is The Barbican; and c) to the wider London skyline. The Applicants would argue that the impacts on all three are negligible, and highly unlikely to be even identified from ground-level, within The Barbican, or from other neighbouring tower blocks across the skyline. Given the height increase measures 3.2m, and is restricted to only a small area in the centre of the Upper Roof Level of the building, it is considered that the proposed development offers a viable, realistic and wholly appropriate town planning and environmental solution for Cromwell Tower.

Planning Legislation

National Policy

There are several national laws, policy, and strategies which apply to this development.

National Planning Policy Framework, 2021

The [National Planning Policy Framework \(NPPF\)](#) sets out the Government's planning policies for England and how these are expected to be applied and is a material consideration for both the Full Planning and Listed Building Consent applications.

Paragraph 7 of the NPPF states "*The purpose of the planning system is to contribute to the achievement of sustainable development*", and in paragraph 10 that "*at the heart of the Framework is **a presumption in favour of sustainable development***". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

*"a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

For decision-taking (paragraph 11) this means:

"c) approving development proposals that accord with an up-to-date development plan without delay; or

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d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

Further to this, paragraph 38 states that *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.”*

The NPPF directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA’s strategic policies must make sufficient provision for:

*“b) infrastructure for transport, **telecommunications** (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)”*

Leading on from this, paragraph 114 states that *“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 how high quality digital 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** (our emphasis) (as these connections will, in almost all cases, provide the optimum solution)”. The proposal which sits before the Council is entirely consistent with the aims expressed within the NPPF.*

It should be noted at this juncture that any upgrading of the proposed apparatus on the rooftop of Cromwell Tower will, of course, be future-proofed, due to the deployment of GRP-shrouding. If additional apparatus is required for deployment, or new, more modern, apparatus is required to replace existing

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apparatus, this will be able to take place within the GRP-shrouding, without impacting the building itself, The Barbican, or the London skyline itself.

This is in alignment with paragraph 115 of the NPPF, which states: “*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**” (our emphasis).*

Code of Practice for Wireless Network Development in England

The [Code of Best Practice](#) has been fully revised, and the latest version was published by DCMS in March 2022. It acknowledges that the planning system plays a key role in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity. The principal aim of the Code is to ensure that the Government’s objective of supporting high-quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The Code confirms that the development of Wireless Network infrastructure must be achieved in a timely and efficient manner, in a way that balances connectivity requirements with the economic, community and social benefits that this brings with the environmental considerations associated with such development. This proposal has a key role to play in delivering the necessary infrastructure to support the increasing reliance on mobile connectivity and so accords with the Code of Best Practice.

UK Government Sustainable Development Goals

The [2030 Agenda for Sustainable Development](#) is a historic global agreement to eradicate extreme poverty, fight inequality and injustice and leave no one behind. Agreed by world leaders at the UN in 2015, the 17 Sustainable Development Goals (SDGs) are fully embedded in the activity of each government department. One of the Government’s primary focuses to achieving Sustainable Development Goal 8 (*‘Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all’*) and Sustainable Development Goal 9 (*‘Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation’*) is to increase economic growth and productivity through improved digital connectivity. The proposal will provide a valuable addition to these Sustainable Development Goals.

National Infrastructure Strategy

Published in November 2020, the Government acknowledges in its [National Infrastructure Strategy](#) that investment in our infrastructure is critical as the UK seeks to recover from the Covid-19 pandemic. The Strategy puts innovation and new technology at its heart, in which the proposed development is at the forefront of this technological revolution. The Government's ambition is to support fast and reliable digital connectivity that can deliver economic, social and well-being benefits because new technologies have enormous potential to improve the environment and the daily lives of people across the UK.

UK Digital Strategy

The [UK Digital Strategy Policy Paper](#) was set out by the Department for Media, Culture and Sport to strengthen its position as a Global Science and Tech Superpower. Part of the UK Digital Strategy is to maintain the strong foundations of our digital economy. This includes building and maintaining a robust digital infrastructure and investment in connectivity infrastructure.

Digital connectivity is now considered to be a utility, and modern life is increasingly impossible without it. Connectivity drives productivity and innovation and is the physical underpinning of a digital nation. The Government has committed that every individual and every business should have the skills and confidence to seize the opportunities of digital technology and have easy access to high-quality internet wherever they live, work, travel or learn. An update to the UK's Digital Strategy was published in June 2022 and reaffirms the continued promotion of the government's policy of delivering improved digital infrastructure and connectivity.

The proposed development is aligned closely to this strategy as it helps to contribute to the installation of high-speed broadband within the UK.

UK Government Policy on Mobile Infrastructure Deployment

The UK Government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks. In 2016, the DCMS produced the following statement in response to this need and stated: "*The Government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile devices anywhere they go.*" The proposed development provides valuable communications infrastructure to help meet the increasing demands for high-quality connectivity, but also assists in the hybrid-working pattern that many employees have enjoyed post-Covid19 lockdown. In order to meet the needs of the public, the necessary infrastructure must be deployed to allow for 'home-working'.

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Levelling Up the United Kingdom

[The Levelling Up the United Kingdom Policy Paper](#) was published on the 2nd of February 2022 by Department for Levelling Up, Housing and Communities. The paper sets out the next stages in the programme to level up the UK. The paper is focussed around ‘missions’ targeting key areas of development.

‘Mission four’ targets ‘*by 2030, the UK will have nationwide 93 gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population*’.

The proposed development is aligned closely to this mission as it helps to contribute to the installation of high-speed broadband within the UK, which is a clear direction of travel for the UK Government.

London Plan 2021

The new [London Plan](#) was adopted in March 2021. In a similar fashion to the previous London Plan (2016), the new 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 ‘*Policy SI 6: Digital Connectivity Infrastructure*’ the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to ensure its global competitiveness, now and in the future.

It is considered that the Applicant’s network, and the provision of high-speed broadband within the City, are an integral element in securing the Mayor’s vision for the delivery of modern communications networks across London. The written justification for Policy SI 6 states the following:

*“The provision of digital infrastructure is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance. London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. **Fast, reliable digital connectivity is essential in today’s economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration.**”*

Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their Development Plans”.

Policy SI 6, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing Luminet to provide high-speed connectivity to Cromwell Tower. The proposed

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development meets the aims of the London Plan (2021) and the long-term strategies which the Mayor aims to achieve through this guidance.

City of London Local Plan (Adopted January 2015)

The City of London Local Plan (January 2015) sets out the City Corporation's vision, strategy, objectives and policies for planning the City of London.

The City of London Local Plan includes the following policies that are relevant to this development:

'Core Strategic Policy CS2: Utilities Infrastructure' – this policy aims to promote and enhance existing utility provision including improved communications services. Section 4 of Policy CS2 states that the City of London aim to facilitate the provision of communications services by:

"Promoting the improvement and extension of utilities infrastructure that is designed and sited to minimise adverse impact on the visual amenity, character and appearance of the City and its heritage assets."

This proposal would contribute to developing strong and reliable high-speed internet connections in the area. Every attempt has been made to minimise the visual impact of the scheme. This should be acknowledged by the Local Authority, and, as a consequence of a well-designed scheme, Planning Officer support should be forthcoming.

Planning History

Historic telecommunications applications at Cromwell Tower

LPA Ref: 09/00680/FULL

Installation of six antennae and two 0.3m dishes on the roof of Cromwell Tower, including the installation of two wall mounted equipment cabinets plus ancillary development thereto.

Decision: Approved on 23/02/2010

It should be noted that the Local Authority's approval of the application 09/00680/FULL assessed the installation of telecommunications apparatus on the rooftop of Cromwell Tower as being acceptable. When the detailed planning drawings, submitted as part of application 09/00680/FULL, are assessed, it is clear that the approved, and acceptable, antennas are of a similar size to the proposed GRP-shrouding which would be deployed as part of the application now before the Council. Given the considerable increases in public demand for high-quality communications networks and super-fast

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broadband, it is argued that access to these services is more sought-after and important than ever. That an application was approved almost 14 years ago for telecommunications apparatus on the rooftop of Cromwell Tower, and that the proposed development has been kept to a similar height, demonstrates that Council support for this application should be forthcoming. It must be acknowledged that the roll-out of 3G, 4G and 5G services since circa 2010 (when application 09/00680/FULL was approved), has required a greater level of more robust equipment; hence the relaxation of the planning regulations over this time – to assist in the roll-out of mobile networks. That a far superior communications system can be deployed in modern day, when compared to the 2010 scheme, without any discernible height increase, is remarkable. Furthermore, GRP-shrouding was not an option in 2010. It is now, and is proposed for deployment as part of this application, to ensure that visual impact is minimised as far as practicable.

The Decision Notice, dated 23/02/2023, for application 09/00680/FULL, states that “*the proposed installation would be barely visible and would have a minimal impact upon the appearance of the special architectural and historic character interest of the listed building*”. It is considered that the same assessment could be taken when the balanced assessment, as advocated within the NPPF, is undertaken when assessing the proposed development. The installation of GRP-shrouding will further reduce any visual impact on the building, or any nearby heritage assets, as it will screen all elements of the proposed apparatus and assimilate with the existing building.

Luminet applications determined by the City of London Council

LPA Ref: 21/00958/FULL

Installation of 37no. new antennas (28no. 0.3x0.3m antennas and 9no. 0.16x0.16m antennas) and ancillary equipment on the roof (180.0m AGL), on the rooftop of Tower 42, International Financial Centre, 25 Old Broad Street, London, EC2N 1HQ.

Decision: Approved on 22/02/2022

Notable comments from the Decision Notice:

***“Planning permission is sought for the installation of 37 antennas at roof level on Tower 42, 25 Old Broad Street. The site is not listed and is not within a Conservation Area, but lies within the setting of Bank and St Helen's Place Conservation Areas as well as in the wider setting of several nearby listed buildings.*”**

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“there would be **no impact** on the **townscape, the significance of the setting of the nearby listed buildings** or to the **appearance and character of the Conservation Areas**” (our emphasis).

Conclusion

The proposal outlined would bring high-quality, high-speed internet to the area with minimal impact to local surroundings and wider neighbourhood. The rooftop at Cromwell House offers an excellent town planning and environmental solution, whilst also offering minimal disruption and visual harm. The scheme has been specifically designed to ensure that the apparatus, which will be screened behind GRP-shrouding, will not be visible, and will also be future-proofed.

We believe this statement has demonstrated that the proposed development is in accordance with National Policy set out in the NPPF, as well as local development plan policies. As such, it is considered that this proposal offers a wholly appropriate design solution which will have minimal visual impact on a) Cromwell Tower itself; b) the heritage asset that is The Barbican; and c) to the wider London skyline.

Given all of the above, we hope that this application can be supported by the Local Authority.