

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Bloomsbury East	Site Address:	Existing Base Station Bonnington Hotel 98 Southampton Row London WC1B 4BH
National Grid Reference:	E:530400 N:181810		
Site Ref Number:	141475_23	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		No
If no explain why: N/A – Upgrade of existing base station		
Were industry site databases checked for suitable sites by the operator:		No
If no explain why: N/A – Upgrade of existing base station		

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why: Summary issues raised: N/A	

Site Specific Pre-application consultation with local planning authority


Was there pre-application contact:	No
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¹ Macro or Micro

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Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised:	
<p>A copy of the proposed plans together with a covering letter were sent to the Chief Planning Officer on 17.04.2023.</p> <p>No response to pre-application at the time of making the application.</p>	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:			
<p>Prior to the submission of this application the applicant-initiated pre-consultation discussions with the local planning authority and stakeholders. This provides an opportunity for the LPA and stakeholders to discuss the development proposals and identify specific issues early.</p> <p>Consultation with Holborn & Covent Garden Councillors and Keir Starmer MP. Pre-application consultation letters and drawings of the proposals were sent on the 17.04.2023.</p>			
Summary of outcome/main issues raised (include copies of relevant correspondence):			
<p>No response to pre-application at the time of making the application.</p>			

School/College


Location of site in relation to school/college (include name of school/college):
<ul style="list-style-type: none"> Woodford Community High School
Outline of consultation carried out with school/college (include evidence of consultation):
<p>Pre-application consultation letters and drawings of the proposals were sent on the 17.04.2023 to the Headteacher and Chair of Governors.</p>
Summary of outcome/main issues raised (include copies of main correspondence):
<p>No response to pre-application at the time of making the application.</p>

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

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Will the structure be within 3km of an aerodrome or airfield?		N/A
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		N/A
Details of response:		
N/A		


Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	28.02.2023	

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3. Proposed Development

The proposed site:

Background

Cornerstone is the UK's leading mobile infrastructure services company. They acquire, manage, and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. They oversee works on behalf of telecommunications providers and wherever possible aim to:

- promote shared infrastructure
- maximise opportunities to consolidate the number of base stations
- significantly reduce the environmental impact of network development

Cornerstone as a company was originally established by two mobile network operators, Vodafone Limited and then Telefónica UK Limited (O2) (now operating as Virgin Media O2 (VMO2), to deploy and operate a shared single grid network providing 2G, 3G and 4G coverage. However, the company now operates independently from the mobile operators, each of which is an Electronic Communications Code Operator licensed under the terms of the 2003 Communications Act, as amended, to provide mobile personal digital communications networks in the UK.

Cornerstone are in the process of progressing a suitable site in this area of Bloomsbury for an upgraded radio base station. As part of Cornerstone's continued network improvement program, there is a specific requirement for an installation at this location to provide improved 2G, 3G, 4G and 5G coverage and capacity, ensuring that this area of the Camden maintains access to the latest technologies for both Telefonica (VMO2) Vodafone service provision.

The site

This application relates to an upgraded telecommunications installation at Bonnington Hotel shown on the photograph below:

The site is located on top of a 5 storey commercial building. The host will be continue to be utilised by Vodafone and Telefonica (VMO2). The building is currently being used for telecommunications and which has become an established part of the streetscene.

The host property supports the existing radio base station comprising both Telefonica (VMO2) and Vodafone pole mounted antennas and ancillary development thereto.

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Image 1: Existing base station at Bonnington Hotel, Bloomsbury

(Source: Google Maps)

Enclose map showing the cell centre and adjoining cells if appropriate:

The amendments to the existing rooftop installation will enable enhanced 4G coverage and capacity to the surrounding area as well as new 5G services for the operator's Telefonica (VMNO2) and Vodafone to ensure high quality customer experience is obtained as demands on the network increase and technologies change.


Fact sheets on Radio Planning and Propagation and Digital Public Benefits have been attached to this application for reference.

Type of Structure: Pole mount

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Description:	
The proposed removal of 6 No. antennas, installation of 12No. antennas, 4No. dishes together with ancillary development thereto.	
Please note: Antenna support poles can be painted to reflect existing brickwork.	
Overall Height:	30.00m AGL (29.84m existing) 26.57m (as existing)
Height of existing building (<i>where applicable</i>):	24.00m Plant Room Level AGL 20.77m Main Roof Level AGL
Equipment Housing:	
Length:	As existing
Width:	As existing
Height:	As existing
<i>Materials (as applicable):</i>	
Tower/mast etc – type of material and external colour:	Galvanised
Equipment housing – type of material and external colour:	As existing
Reasons for choice of design, making reference to pre-application responses:	

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Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (Paragraph 126) National Planning Policy Framework (Revised). It states:

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

In keeping with the National Planning Policy Framework (NPPF) guidelines of using: "high quality communications infrastructure", the proposed design has been selected to minimise visual impact upon the surrounding environment.

The site has been a radio base station for a number of years. It has become an established part of the streetscene in this area of Southampton Row. To minimise the impact on the surrounding area, the proposed upgrade to the existing radio base station will resemble as closely as possible the existing apparatus already in situ.

Due to technological advances additional antennas are required to provide enhanced 4G as well as new 5G services for both VMO2 and Vodafone.

To this end the existing antennas (6 no) will be removed and 12 no antennas will be installed atop of the roof of Bonnington Hotel.

The proposed top height of the replacement antennas is essential to enable the antenna to clear the rooftop and adjacent rooftops (avoiding clipping) and reach the target coverage area. Notably no additional sectors are required. The proposal seek to utilise existing steel work, 2 no sectors will remain at 26.57m and 1 no sector will increase by 14mm to 30.0m. If the antenna was to be any lower in height then they would not be able to provide the necessary high-quality communications which is required for everyday access to high speed data in this area of the city, which users of their handheld devices have come to expect in this 21st Century technological age. The antenna would also clip the edges of the roof and as such preventing the antennas from operating effectively. Any lower heights would also cause ICNIRP issues, sterilising large parts of the rooftop.


The new replacement antennas need to handle significantly more data and capacity than the existing antennas and as such need to be slightly bigger, but shorter in order to accommodate all the technologies including 5G in the one installation, without the need for an additional installation elsewhere within this busy area of the city.

The following Scenario's extracted from the Code of Practice set out basic siting principles.

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Scenario 1.

X

Antennas are of low elevation and set back from the rooftop edge.

The International Commission on Non-Ionizing Radiation Protection (ICNIRP) has developed exposure limits adopted by the UK Government. All mobile network operator installations are designed to comply with the ICNIRP exposure limits as adopted in European Union directives and UK legislation.

This scenario might be considered the most visually sympathetic solution as antennas are both set back from the rooftop edge and are of lower elevation. **However, the below example is not an ICNIRP compliant design, and therefore would not be proposed.**

The person shown is within the exclusion zone – this is not ICNIRP compliant, as the antennas are too low.

With the antennas positioned here “clipping” occurs. This is when the radio frequency signal propagation from an antenna ‘clips’ the building edge and would result in exclusion zones over sections of the rooftop. This will impact radio performance and service provision to the point that the solution is not viable.

Each Scenario is indicative and a simplified version to demonstrate the technical constraints and solutions. Although 2D was used for simplicity, antennas must be carefully sited at locations on a building to provide 360 degree coverage, and must always be ICNIRP compliant.

Image 2: Extract from Code of Practice

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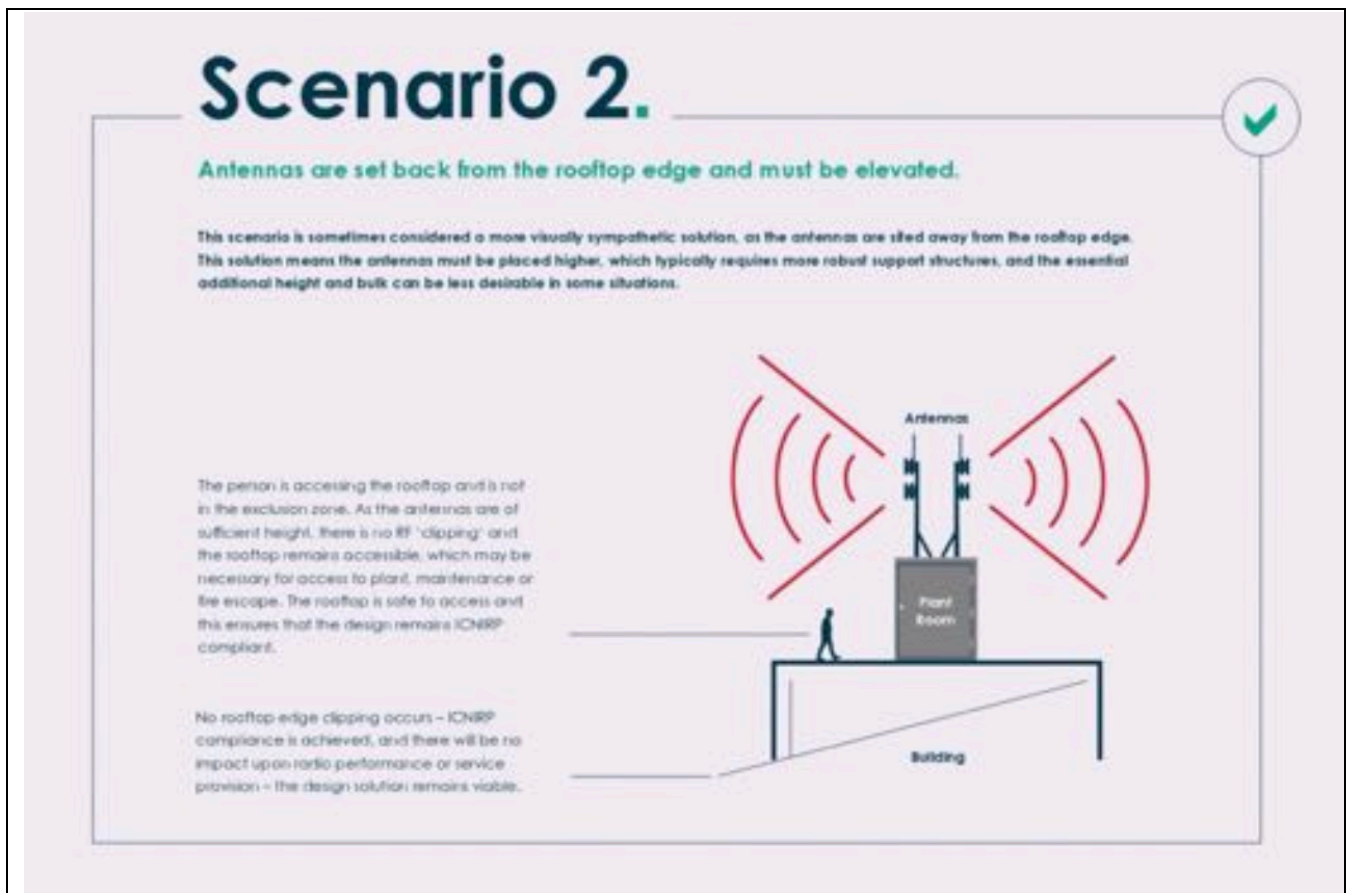


Image 3: Extract from Code of Practice

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the multi technical requirements for the site. Taking all matters into account, it is considered that this upgraded installation, on an established Cornerstone radio base station site, to enable the enhancement of 2G, 3G and 4G service provision and provide new 5G technology to the surrounding area for the operators Telefonica (VMNO2) and Vodafone, would not appear out of place and would continue to provide high quality coverage and capacity, delivering the capability for a multi high tech service from a single installation.

Photomontages are available on request.

Technical Information


Health and Safety - including ICNIRP compliance

An ICNIRP certificate is provided as part of this application.

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<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)</p> <p>International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.</p> <p>When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, Telefonica (VMO2) and Vodafone's operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p> <p>As part of Telefonica's (VMO2) and Vodafone's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.</p> <p>The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.</p>	<p>Yes</p>	
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4. Technical Justification


Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

Reason(s) why site required e.g. coverage, upgrade, capacity:

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A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

The National Planning Policy Framework states that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt as set out below this upgraded site is needed for Telefonica (VMNO2) and Vodafone to improve their 4G and 5G services to this busy area.

The term 'capacity' refers to the fact that each base station can only provide services to a certain number of users at any one time. When this 'Capacity' is exceeded, although 'Coverage' remains present, the base station cannot provide service to any further users and calls/text/data usage would be unavailable. This is contrary to the purposes in which the operator's customers purchased their handheld devices as well as the Government's latest thinking that everyone should have access to the information superhighway wherever they are.

An upgraded installation in this location will ensure that the latest high quality 4G service provision is enhanced in and around this area of Bloomsbury and new 5G services are provided for both VMO2 and Vodafone covering numerous Underground stations (Holborn, Tottenham Court Road, Russell Square, Goodge Street) in close proximity to the British Museum which attracts circa 1.4 million visitors per annum. The area has PTAL accessibility rating of 6b (best).

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. In addition, fact sheets on Radio Planning and Propagation have been attached to this application for reference. This information is provided to assist the local authority in understanding any technical constraints on the location of the proposed development.

5. Site Selection Process

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

Site	Site Name, Address, NGR, Site Type	Reason for not Choosing
N/A	N/A	N/A - Upgrade of existing base station.


If no alternative site options have been investigated, please explain why:

Upgrade of existing base station.

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Environmental Information (refer to Section 2 of Site Finder Report):

No specific environmental considerations identified to date.

Land use planning designations (if Heritage Statement is required then include here or make reference to attached Heritage Statement):

Bloomsbury Conservation Area.

Additional relevant information (include planning policy and material considerations):

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

It is not necessary to quote extensively from this document, but the following points are highlighted.

National Planning Policy Framework (July 2021)

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. In July 2021 the NPPF was revised again. Overall, it's been revised to strengthen other sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 114 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of *reliable* communications infrastructure for both economic growth *and social well-being*.

The NPPF continues to support the expansion of electronic communications networks at paragraph 114. It notes that 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. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF makes reference to 5G:


'Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)...'

With the above in mind, the Government is already forward thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for

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the purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

Paragraph 115 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 118 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining applications on planning grounds only. They 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.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or 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 the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 38 it 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...permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 81 states:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴²'...

Footnote 42 of the NPPF states:


'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'.

The NPPF provides guidance on proposals affecting heritage assets. Paragraph 194 states that 'in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

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Paragraph 195 goes on to state that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset).

The NPPF goes on to provide guidance on considering the potential impacts of development on heritage assets. Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 202 retains advice provided in the 2012 version of NPPF relating to the degree of harm. It states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Public benefits are defined within the NPPG and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

The proposed upgrade proposals accord with all these aspects of the NPPF in that it will provide Telefonica (VMNO2) and Vodafone with continued and improved network provision within this area of Camden bringing a range of associated economic and technical benefits and helping the Government's 'Levelling Up' Agenda.

In order for the UK to benefit from the huge potential of 5G Local Planning Authorities will have to weigh the Public Benefits of such connectivity with the requirements to instruct and manage the built environment. Central Government understands that this may present concerns with the various design solutions proposed but it is important that all Local Planning Authorities understand the technical needs of 5G and better understands the wider advantages of such new technology. This is further emphasized within the National Infrastructure Commission's report in 2016, where National Digital Strategy will be directed through the Economy and Industrial Strategy Cabinet Committee in order to:

"Support and challenge local government in their plans to enable the delivery of digital infrastructure; both in terms of ensuring that these plans help the UK to meet its national objectives, and that local authorities develop consistent approaches to support the deployment of mobile infrastructure across the country". 'Connected Future', National Infrastructure Commission 2016.

Code of Practice for Wireless Network Development in England (March 2022)


The Code of Practice provides guidance to Code Operators (referred to as 'operators' throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The aim of the Code of Practice is to support the government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an

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important role in making sure that appropriate engagement takes place with local communities and other interested parties.

The Code of Practice covers all forms of wireless infrastructure development, including mobile masts and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Best Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

The Code of Practice sets out the legal and policy framework for the delivery of wireless infrastructure development.

Paragraphs 8 – 12 of the Code of Practice set out the importance of connectivity:

'8. Digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK.

9. As the demand for mobile data in the United Kingdom is increasing rapidly, it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.

10. The [Future Telecoms Infrastructure Review \(FTIR\)](#) and the [National Infrastructure Strategy](#) set out the government's long-term strategy for meeting its digital connectivity targets and delivering high quality, reliable digital infrastructure that works across the UK².

11. The government has committed to extending mobile coverage across the UK. The government has committed to extending mobile coverage across the UK. The government's Levelling Up White Paper has set a mission that the UK will have nationwide 4G coverage, with 5G coverage for the majority of the population by 2030. In support of this, the government and the UK's mobile network operators agreed a [£1 billion Shared Rural Network deal](#) to extend 4G mobile geographical coverage to 95% of the UK by the end of the programme.


12. [Next Generation Mobile Technologies: A 5G Strategy for the UK](#), and the [update](#) to this, set out the government's ambition for the UK to be a global leader in 5G to take early advantage of its potential and help to create a world-leading digital economy that works for everyone. The government also wants businesses and communities to benefit from investments in 5G as soon as possible. Through the government's 5G Testbeds and Trials programme we have seen its value to manufacturing, farming, transport networks and healthcare.

² [The Statement of Strategic Priorities for Telecommunications, The Management of the Radio Spectrum, and Postal Services](#) followed the publication of the FTIR and reflects its conclusions

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The Government recognises the key role that the Planning System plays 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 Code of Practice sets out 'How wireless networks function.

Para. 16 states *"Cellular wireless networks use base stations to provide an area of radio coverage. Wireless technology uses the radio spectrum to broadcast radio waves between base stations and devices. Different radio frequencies have different characteristics which, along with the density of cell site locations, affect the extent of coverage and how much data can be carried over the network. Depending on the radio frequencies used, base stations can deliver coverage over a wide area or provide extra network capacity in areas where there is a high demand for network bandwidth"*.

Para. 17 sets out that *"Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications"*.

The Code of Practice establishes 'Principles and commitments' by which operators should develop their networks and that Local Planning Authorities should demonstrate their support by.

Paragraph 18 of the Code of Practice sets out the principles and commitments that operators should follow when developing their networks inter alia:

- Site sharing and use of existing structures: make use of existing structures, sites and masts wherever possible to reduce the need for new development.
- Consultation with local planning authorities, local communities and other stakeholders.
- Standardised and high-quality approach to planning applications, and the notification procedure: provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements.
- Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation (ICNIRP) public exposure levels guidance.

The Code of Practice also sets out the requirements of the LPA in relation to the deployment of digital infrastructure:


- Incentivising connectivity: support the expansion of telecommunications networks, and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.
- Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.
- Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.

The added emphasis on support from Local Planning Authorities in the deployment in digital infrastructure is even more evident in the revised Code of Practice. The Code of Practice recognises

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the importance of collaboration and partnership to help drive network coverage across the country. It goes on to state that *'In all instances, it is important for all parties involved in the process to take a positive approach to consultation and engagement'*.

Siting and Design Principles

The government's objective is to deliver high quality, reliable wireless infrastructure whilst ensuring the impact of new network development is kept to a minimum. The siting and design of wireless network infrastructure is central to achieving this. The Code of Practice acknowledges that *'good siting and design principles should apply to all wireless network development and take into account any site specific considerations and context. Both can create better places in which to live and work and help make development acceptable to communities'*.

The Code provides guidance on siting and appearance principles. It sets out several design principles in respect of telecommunications development and acknowledges that the options for design used by an operator will be affected by site conditions including requirements to link the site to the network, landscape features and coverage and capacity requirements. The guidance includes at Para. 22 *'the choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible'*.

Para. 23 confirms that there should be a **'presumption in favour of facilitating sustainable network development'** and, as such, operators and local planning authorities, as well as all other bodies involved in the deployment process, should work together to ensure connectivity needs are met and find viable solutions to deployment issues (emphasis added).

Paragraphs 24 - 27 sets out general siting and site selection principles which Operators should consider. The Code of Practice acknowledges at Para. 24 that *'Operators use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 3G, 4G and now 5G. Once an operator has identified a requirement for a new cell site, a suitable site needs to be found. Elements that make a site favourable include: having existing or ready access to a power supply, access to fibre optic cables, vehicular access, and, other buildings and development which may provide a level of existing screening. Operators will typically look to upgrade existing infrastructure prior to considering a new deployment, in particular for initial 5G deployment'*.


Para 25 notes that *'When selecting sites for mobile infrastructure, operators should examine local plans and designations for the area, as well as carrying out an in-person site search to identify potential options which meet their requirements. Operators should follow these general siting and site selection principles:*

- *Installation on existing buildings and structures;*
- *Erecting new ground based masts;*
- *Camouflaging or disguising equipment where appropriate;*
- *Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage); and*
- *Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator)'*.

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Para. 26 highlights that the installation of all wireless infrastructure requires a balanced approach between the technical needs and constraints of the proposed site and the potential impact of the development. The three key technical and operational considerations for installation sites are:

- **Coverage:** wireless infrastructure needs to provide an appropriate level of coverage over the intended geographical area. This involves ensuring that antennas are elevated sufficiently (often via masts) to provide clear lines of sight for signals.
- **Capacity:** where existing network infrastructure can no longer meet the demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand. This is more likely to be required in densely populated areas or areas of high footfall.
- **Backhaul:** the radio access network requires a connection to the core network. Backhaul is sometimes provided by a microwave link, which requires a clear line of sight between the two ends of the link.

Para 27 requires that Local Planning Authorities consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. Para. 27 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

In respect of 'Design', the Code of Practice at Para 28 acknowledges that the siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact including

- **Protecting visual amenity**
- **Mitigating visual impacts**

Para. 29 acknowledges that these factors along with location and the coverage and capacity requirements can influence the type of infrastructure structure that is deployed and requires that '*planning authorities should be aware of these constraints when considering proposals. In particular:*

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.*


The Code of Practice establishes radio equipment housing (cabinets) principles. It states at Para. 30 states that "*cabinets protect radio transmitters and receivers, provide the power source for mobile equipment, and are connected to antennas via cables. Equipment cabinets are likely to be needed at most sites. The cabinets must be of sufficient size to facilitate hosting various operating equipment whilst also allowing air circulation to reduce the potential for overheating*". The Code of Practice establishes the planning and visual considerations for siting radio housing. These include:

- Colouring
- Siting on highways and footways:
- Highway safety:

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- Listed buildings/ scheduled monuments and Conservation Areas:
- Access
- Trees

The Code of Practice notes that new ground-based masts will sometimes be required to accommodate the ever-increasing coverage and capacity needs of the country. 4G and 5G are likely to require further network densification in order to meet growing customer demand for data. Where higher frequencies are used, with lower signal propagation characteristics, apparatus will need to be located in closer proximity to user devices. The type of mast deployed will depend upon the location and setting, as well as the coverage requirements of the site. The Code acknowledges that there are many ways by which the potential for environmental and visual impact of a ground-based mast can be reduced.

Paragraph 39 advises that all new masts should be sited, so far as practicable, so as to minimise their impact on their setting, including the landscape and any buildings. This includes siting next to similar structures – e.g. streetworks masts should ideally be sited in line, and in harmony, with existing vertical structures such as lighting columns, to minimise their visual impact. Placing a mast within or adjacent to an existing group of trees, vegetation and other natural features can reduce visual impact. Antennas will however, need to be sufficiently elevated to clear the tree-line.

Paragraph 40 relates to colouring and camouflage and states that where appropriate masts should be coloured to match their backdrop to minimise contrast in an urban setting. Streetworks monopoles can utilise design features such as shrouding or banding to protect visual amenity, though, for some 5G infrastructure, camouflage design solutions may not be practicable. Simple designs should be encouraged. Masts which have a complex design are more likely to dominate and be in discord with the landscape and have adverse visual impacts.

The Code of Practice states again in paragraph 64 that there are three primary technical and operational considerations for installation of radio base stations which are: ensuring that wireless infrastructure provides an appropriate level of coverage over the intended geographical area; ensuring that sites have sufficient capacity to meet user demand; and, requiring a connection to the wider network 'backhaul'. Paragraph 65 notes that planning authorities should take account of these constraints on network deployment and siting and design, when considering proposals.

Paragraphs 66 and 67 of the Code of Practice set out the 5G network deployment considerations:


'66. With the introduction of 5G, more equipment will be required to provide coverage and capacity. 5G, as well as 4G, are data-driven technologies, and high volumes of data will be transmitted between base stations and wireless devices. 5G will require a denser network of base stations than previous generations, including more fixed line fibre optic cable for reliable and high capacity backhaul. The siting of 5G installations will be more constrained and guided by these special technical and operational considerations.

67. Due to the scale and technological constraints of 5G equipment, in some cases previous camouflage design solutions, such as tree mast designs and concealing antennas in flagpoles, may not be practicable or suitable. In these cases, simple designs with particular attention to colouration and finishes may help reduce visual impacts on a site-specific basis.

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Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

The Local Plan for the area comprises the:

- The London Plan 2021
- Camden Local Plan (Adopted 2017)

The London Plan 2021

The London Plan 2021 is the new Spatial Development Strategy for Greater London and was adopted in March 2021 and is now part of the statutory development plan. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. Chapter 1 of the London Plan deals with 'Planning London's Future - Good Growth'. Para.1.0.1 relates to 'Good Growth' that is "socially and economically inclusive and environmentally sustainable and underpins the whole of the London Plan and each policy. It is the way in which sustainable development in London is to be achieved".

Para 1.1.4 under 'Building Strong & Inclusive Communities' includes: '*... social, physical and environmental infrastructure that meets London's diverse needs is essential if London is to maintain and develop strong and inclusive communities.*' The corresponding policy in GG1 Building strong & inclusive communities states:

'Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:'

*'... C provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation
D seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city'*

'I support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.'


Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities.

Para. 1.3.1 states '*The mental and physical health of Londoners is, to a large extent, determined by the environment in which they live. Transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants*

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of health can be shaped by the planning system, and local authorities are accordingly responsible for planning and public health'. During the Covid-19 pandemic there has been a much greater reliance on mobile digital connectivity to stay connected with family and friends and has become has enabled working from home and home-schooling. Without the infrastructure which enables reliable connectivity, we could not stay connected.

Policy GG5 relates to 'Growing a good economy. The supporting text states:

'.....London is the engine of the UK economy, accounting for more than a fifth of the country's economic output. Its labour market, housing market and transport links are interconnected with the Wider South East city region, which shapes the development of the whole of the UK. Together, London and the Wider South East contribute a full half of the country's output. London has unique strengths in specialist fields like finance, business services, technology, creative industries and law, as well as attracting tourists from around the world, providing a gateway to the rest of the UK. The wealth this generates is essential to keeping the whole country functioning, but the benefits of economic success are not shared evenly within London itself.'

'... Projected growth towards 6.9 million jobs by 2041 provides an opportunity to strengthen London's economy for the future, and doing so will depend on increasing diversification. The Central Activities Zone and Northern Isle of Dogs will remain vital to London's economic success, but growth in town centres across London will be equally important, alongside supporting local regeneration, investment in Opportunity Areas and enabling access to a wide range of jobs. Reasonably-priced, good quality employment space will be needed across London to make this happen'.

The right infrastructure is also required to help businesses succeed across London. The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processes, opening up new markets and allowing more flexible working. Convenient transport connections and street, rail and waterway networks that allow the efficient movement of goods and people are also vital, alongside the schools, healthcare facilities and other amenities that employees need to be healthy and productive.'

GG5 'Growing a good economy' states:

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

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

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


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

The upgraded base station installation is essential infrastructure which will provide world class digital connectivity which will support the digital economy. Reliable mobile digital connectivity supports London's growth, and contributes to the low carbon economy by enabling flexible working amongst other things. In terms of supporting London's role in innovation toward growing a good economy.

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Digital connectivity and the benefits it brings to London's global competitiveness now and in the future receives more prominence and importance in the London Plan 2021. Paras 9.6.1 – 9.6.9 encourage the delivery of high-quality / world-class digital infrastructure.

Policy SI 6 relates to 'Digital Connectivity Infrastructure'.

Para 9.6.1 states that **'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'(emphasis added).

Paragraph 9.6.6 states 'Access for network operators to rooftops of new developments should be supported where an improvement to the mobile connectivity of the area can be identified. Where possible, other opportunities to secure mobile connectivity improvements should also be sought through new developments, including for example the creative use of the public realm'.

Paragraph 9.6.8 states 'The Mayor will work with network operators, developers, councils and Government to develop guidance and share good practice to increase awareness and capability amongst boroughs and developers of the effective provision of digital connectivity and to support the delivery of policy requirements. The Mayor will also help to identify spatial gaps in connectivity and overcome barriers to delivery to address this form of digital exclusion, in particular through his Connected London work. Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their Development Plans'.

The policies relating to Design (Chapter 3) and heritage conservation (policy HC1) seek to promote proposals that are of 'good design' and are sympathetic to the heritage assets and their surroundings. The proposed upgraded base station is well positioned and of a scale, appearance and shape that responds to the local context and historic assets while also acknowledging the area's social and economic needs.

Cornerstone's infrastructure and Telefonica (VMO2) and Vodafone's network are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

Camden Local Plan (2017)

The Local Plan was adopted by the Council in 2017 and sets out policies and guidance for the development of the borough until 2031. The Council's vision for the borough is set out in the Camden Plan which also acts as the vision for the Local Plan. It states:


"We want to make Camden a better borough – a place where everyone has a chance to succeed and where nobody gets left behind. A place that works for everyone".

Policy D1 relates to design and sets out the criteria against which proposals will be assessed.

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The first two criteria of the policy are considered relevant to the applicants' proposal and state:

The Council will seek to secure high quality design in development. The Council will require that development:

- a. respects local context and character;*
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage*

Policy D2 deals with Heritage in Camden and has a specific section on Conservation Areas. An assessment of the appeal proposals against this policy is included in the Heritage Impact Assessment. The criteria that are considered relevant to the applicants' proposals are:

"Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*

Para. 2.1 states "Camden, along with London as a whole, is experiencing significant change, with substantial population growth and increases in demand for housing and employment". Para. 2.2 confirms that the "Council's objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, while ensuring that growth delivers opportunities and benefits for our residents and businesses. This plan aims to deliver sustainable growth while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit".

Policy G1 deals with 'Delivery and location of growth'. Policy G1 sets out the conditions to create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.


The Local Plan does not have a policy that is directly relevant to the installation of telecommunications in the Borough. Paragraph 5.10 'Digital Infrastructure' which is included in the supporting text for Policy E1 – 'Economic Development' states that the "Council recognises the importance of digital infrastructure including telecommunications". Indeed recognising the importance of Digital Connectivity, the Mayor for London through the Greater London Borough Authorities has amended planning application forms in order to monitor 'Mobile Connectivity' and the implementation of London Plan Policy SI 6, in order to help avoid recurring situations like the one the appeal site is to help rectify.

Moreover, it explicitly recognises under Para. 2.5 of the Local Plan the key priorities for harnessing the benefits of growth the need for 'securing the infrastructure and services to meet the needs of our growing number of residents, workers and visitors' with infrastructure needs including digital infrastructure requirements then identified in Appendix 1 which in turn references the Camden Digital Strategy 2014, again demonstrating the participation of the planning process in supporting digital

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connectivity via *'Improved internet access through the acceleration of high speed connectivity, including public wireless systems.'*

Digital Camden (2014)

The strategy was published in 2014 and sets out a series of actions to support the uptake of high quality, next generation connectivity. It prioritised *'creating the conditions for and harnessing the benefits of economic growth'* including *'stimulate an expansion of high-speed internet access across the Borough...'*

Having a digital strategy in 2014 shows that wider Camden Council was a leading proponent of the UK Government's Digital Strategy initiative and understood even then the economic benefit of good quality communications services.

This was detailed in the document UK Digital Strategy A new approach to digital change for our borough (2016), in which Camden set out *'We believe it's about enabling the transformation of government, business and society for the better.'* Under the Unlocking Growth recommendations for the UK Digital Strategy Recommendation 6: *'The UK Digital Strategy needs to continue focusing on accelerating superfast connectivity which is particularly poor within inner London as well as incubating the rollout of next generation mobile and telecommunications connectivity to enable ubiquitous access to the internet and greater competition. Central and local public service estate should be used to boost connectivity, following Camden's 'digital rooftops' initiative.'* With regard to Smart Cities, it says *'Alongside this a whole new wave of service innovation is being driven through the digitisation of our lives with cars, health monitors and mobile phones providing vast amounts of information that offer fundamentally different and disruptive ways of delivering services.'*

Camden Planning Guidance Design

The planning guidance document is intended to support the policies of the Local Plan and is a material consideration in determining planning applications.

The Draft guidance states that it does not specifically apply to telecommunications as they are considered in other guidance. However, there is a section in the guidance which is relevant to Heritage and looks at integrating new development with heritage assets. The guidance states that:

"Development proposed to a heritage asset or in close proximity to a heritage asset is informed through understanding of its sensitive context, the historic environment and the significance of the heritage asset and its setting.


The Council expects that development not only conserves and avoids harm but also takes opportunities to enhance or better reveal the significance of heritage assets and their settings. Development must respect local character and context and seek to enhance the character of an area where possible".

The guidance has not been written with specialist telecoms infrastructure in mind and the design of the proposed equipment cannot be altered due to the technical requirements. The antennas have been positioned on the building to enable their effective operation, and have been set back from the roof edge at the lowest possible height to minimise their appearance. An expectation that all development affecting heritage assets 'avoids harm' is a high threshold and not reflective of the requirement to provide connectivity to all areas, including heritage areas, via suitably designed and

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functional infrastructure which is simply not addressed by these policies. When considering the appropriateness of telecommunications development proposals, it is imperative that Decision Makers give precedence to telecommunications specific policy where it exists. If it does not exist at a local level, or if the policy is out of date, then the NPPF must prevail. One must also appreciate that it is extremely unreasonable to expect niche infrastructural development to strictly adhere to more general policy criteria.

Camden Planning Guidance Amenity

The planning guidance document is intended to support the policies of the Local Plan and is a material consideration in determining planning applications but makes no reference to telecommunications.

The section on outlook is the only section that can relate to the proposed development and states:

“Outlook is the visual amenity enjoyed by occupants when looking out of their windows or from their garden. How pleasant an outlook is depends on what is being viewed. For example, an outlook onto amenity space is more pleasant than an outlook across a servicing yard. Particular care should therefore be taken if the proposed development adjoins properties with a single aspect. Any unpleasant features should be screened if possible, for example with permanent landscaping.

Developments should ensure that the proximity, size or cumulative effect of any structures avoids having an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties by adjoining residential occupiers. The location of bin or cycle stores, for example, should be carefully considered if they are in close proximity to windows or spaces used by occupiers.

It should be noted that the specific view from a property is not protected as this is not a material planning consideration”.

Planning Issues

The main issues arising from this full planning application are whether the upgraded antennas and ancillary development would be a visually obtrusive feature which would be detrimental to the character and appearance of the area and Bloomsbury Conservation Area. Whether any perceived harm would outweigh the significant social and economic benefits associated with the increased service provision attributed to the proposal and other valid material considerations as outlined within NPPF, the London Plan 2021 and the Camden Local Plan.

The following paragraphs set out how the application complies with the NPPF, The Code of Best Practice, the London Plan and the Camden Local Plan. The requirement for upgraded capacity and coverage is urgently required to provide additional capacity into this economically vital area.

The following assessment of this proposal is based on a comparison of the existing scheme, compared to the proposed scheme rather than considering the latest proposal afresh.


Siting

The siting of the proposed radio base station has been carefully considered. To this end, an established rooftop telecommunications radio base station is to be utilised and upgraded to enable the latest 4G services to be provided as well as new 5G for both VMO2 and Vodafone. This is in full accordance

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with national guidance contained within the NPPF, the Code of Best Practice and SI 6 of the London Plan and Policies G1, E1 and D2 of the Camden Local Plan.

The host property supports an existing radio base station comprising both Vodafone and Telefonica (VMO2) equipment. The new antenna will be located in the same position and on existing support poles albeit one support pole is raised by 1.6m. This minimises the visual impact of the apparatus on the host building in line with SI 6 of the London Plan and DM2.7 of the Local Plan.

The top height of the new antenna will be increased to satisfy ICNIRP regulations and avoid clipping. It is not considered that they will appear more prominent in the skyline than the existing especially as they are in a location where there is already established antenna equipment. This is in line with Policy SI 6 London Plan and Policies G1, E1 and D2 of the Camden Local Plan.

The proposed amendments to the existing radio base station will fully support the NPPF guidance, the London Plan and Camden Local Plan. 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 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 should be encouraged. The proposed amendments relate to making minor modifications to an existing radio base station, on an existing building, which is currently utilised by Telefonica and Vodafone. It is therefore in full compliance with the NPPF.

The proposed upgrade of an existing base station comprising the removal of 6 no antennas and addition of 12 no antennas on existing pole mounts on the rooftop of Bonnington Hotel thereto fully complies with Policy SI 6 of the London Plan.

These amendments will have no unacceptable impact on the character and appearance of the area, on amenities of occupiers of nearby properties, will utilise an existing established radio base station on top of an existing building, the existing apparatus will continue to be utilised by two operators and will not be detrimental to the character and appearance of the Bloomsbury Conservation Area.

Appearance

The replacement antennas will appear as similar as possible to the existing antennas already in situ on this established rooftop telecommunications site. The antenna will be made from the same materials, be the same colour and have a similar design and appearance as the existing antennas. Given their height above ground level and set back position from the highway behind the parapet this will ensure that they will not appear prominent in the wider streetscene.


The design and appearance of the new antenna will resemble as closely as possible the existing antennas already in situ on the rooftop of the host building albeit at a taller height atop of the roof due to ICNIRP. The colouring and materials used will match the existing antennas. However, due to the amount of data that these new antennas have to support, as well as the operational requirements of 5G technology it is an operational requirement that they are slightly bigger and at an increased height than the existing antennas already in situ. The proposed upgrade to the existing radio base station therefore fully complies with the NPPF, the Code of Best Practice and Policy SI 6 of the London Plan.

For the avoidance of doubt, new antenna is required and need to be bigger (width and depth) than the existing antennas already in situ to enable the latest technologies to be provided in this area of Camden. The superfast data that has to be carried by the antenna requires larger antennas to be

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installed. The upgraded site will reduce the varying levels of coverage for the operator in the area and boost the signal for its customers, with minimal visual impact on the surrounding environment.

The proposed upgrade to the existing radio base station has been designed to be fully ICNIRP compliant. A Declaration of Conformity with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) Public Exposure Guidelines is enclosed with the application documents. It is therefore not necessary for the Council to set health safeguards different from the International Commission guidelines for public exposure.

Need for 5G

Mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work.

The proposed installation will help improve the area's economic prosperity, strengthen the urban economy's by supporting local businesses to start, grow, adapt and diversify. It will support a better environment for today and tomorrow by reducing the need to travel and in turn minimise carbon emissions, a key ambition of the NPPF and the London Plan.

The Councillor's Guide to Digital Connectivity notes that a survey conducted by the Confederation of British Industry found that 81% of firms said that they see more reliable mobile connectivity as essential. Studies have also shown that mobile broadband is associated with positive impacts nationally, such as higher GDP and increased employment.

Therefore the Government fully supports high quality communications infrastructure, even more so with the advent of 5G. The NPPF continues to strongly support telecommunications connectivity and states at paragraph 114 that local planning authorities should support the expansion of electronic communications networks. It acknowledges that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.

The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.

An upgraded installation in this location will fill the current gap in the latest high-quality service provision and enable Cornerstone to provide the infrastructure that will be utilised by Vodafone and Telefonica (VMO2) and MVNOs who buy network space off these two operators to maintain access to their handheld devices wherever they are for the purposes in which they were purchased. This is fully in line with the Government's aspirations that everyone has access to the superfast communications network, the NPPF and the London Plan.

Access to the internet in whatever medium now impacts every facet of our lives but only benefits those who can access and use it. The benefits of internet connectivity are key for both residents and businesses alike and an upgraded radio base station in this location providing the latest 2G, 3G, 4G and 5G technologies will support policy aspirations.


In line with guidance contained within the NPPF, London Plan and Camden Local Plan an upgraded radio base station in this location will enable fast, reliable, secure internet accessibility wherever the user is located. The minor amendments to the existing installation in this location would fully meet the latest operators' coverage and capacity requirements for 3G, 4G and new 5G provision. This would

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be wholly in line with the Government's latest aspirations to strongly support advanced, high quality and reliable communications infrastructure, essential for economic growth and social well-being. Where the NPPF notes that decisions should support the expansion of electronic communications networks. An installation outside this search area, regardless of whether there are existing sites, would not allow the operators to provide their desired level of coverage and therefore would not adequately maintain and provide new coverage and capacity.

The Code of Best Practice acknowledges that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which we rely. With increasing consumer demand and the Government's aspirations for high quality communications infrastructure it is ever more important to improve connectivity and capacity.

The Code of Best Practice acknowledges that there will be times when there is a need for a new radio base station, where sites have been lost, where areas have limited or no coverage and where coverage and capacity need to be enhanced. This application is one such example where there is a need to enhance 3G and 4G provision and provide new 5G services within this area.

In the Code of Best Practice, it acknowledges *'the pressure on networks to upgrade and improve networks through changes to existing sites and the development of new sites is constant. With the increasing consumer demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity. This is due to the ever-increasing demand for data hungry applications to be available to a range of connected devices, such as smartphones and tablet computers. However, The Code notes that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which they rely'*. Therefore, there is a significant need to locate the equipment in this area.


Connected Nations 2022 – England Report

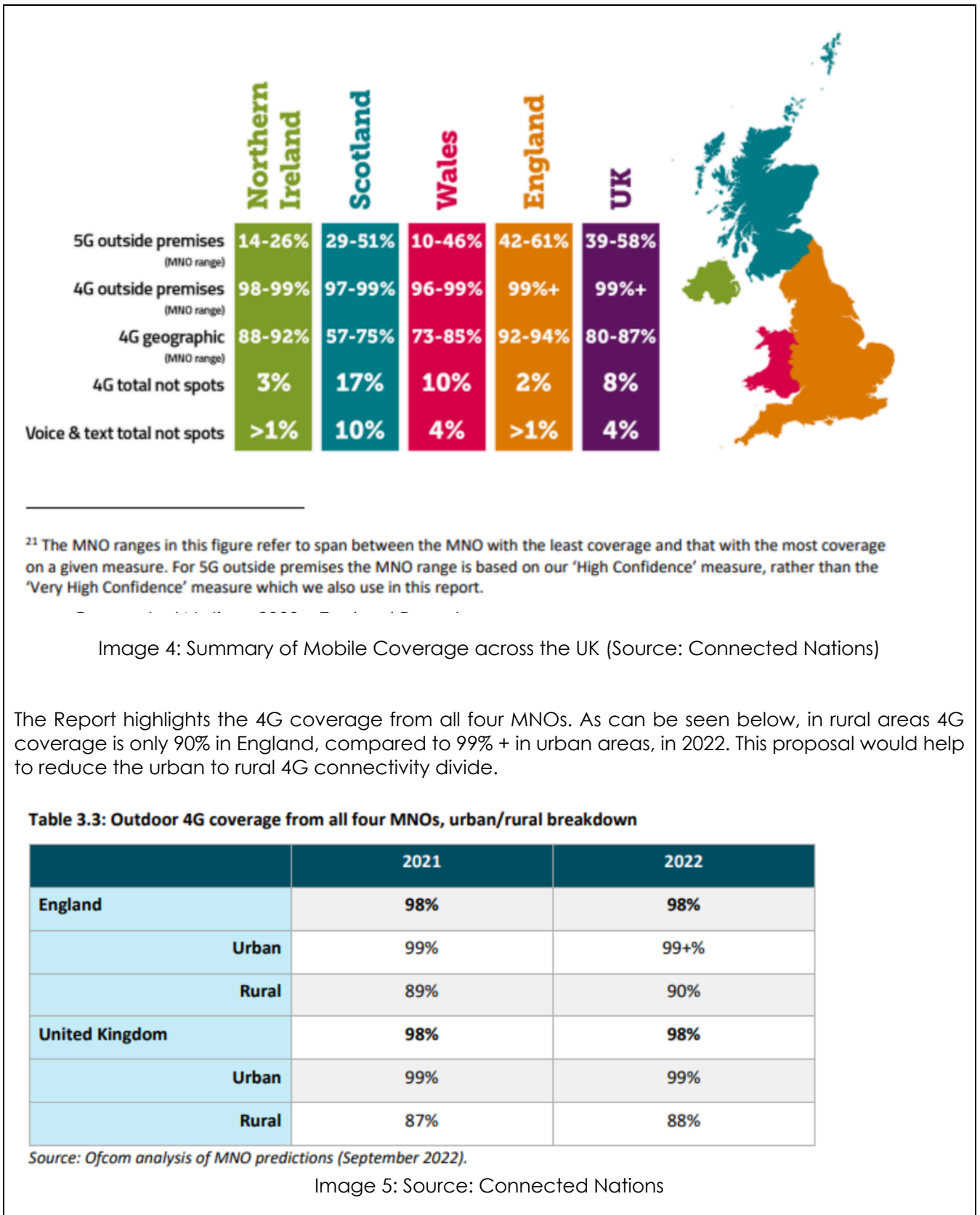
The OFCOM Connected Nations 2022 – England Report acknowledges that in England 4G geographic coverage is currently at 92-94% and the UK geographic coverage is just 80-87%. An installation designed to fill the hole in 4G coverage to this popular area would help to increase the 4G and 5G coverage in line with this Government target.

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Table 3.4 (Image 5 above) in the Report goes on to describe the geographic coverage of 4G, comparing the coverage from at least one MNO and from all MNOs both in England and across the UK. As can be seen, there is 92% coverage across the UK from at least one MNO, but only 70% from all MNOs.

Online Nation Report 2022

It is also important to evaluate the proposed development within a context of how people in the UK are using mobile communications networks and industry trends, especially those experienced during the peaks of the Covid-19 pandemic. We would therefore refer the reader to 'Online Nation 2022 Report' which has been produced by Ofcom.

The report confirms the following:

- UK adults spend almost 4 hours a day online, 3 hours of which are spent on smartphones. (UK young adults (i.e., 18-24 year olds spend approximately 5 hours online and UK adults aged 55+ spend approximately 3 hours online)
- 73% of time spent online/day by UK adults was via a smartphone
- 1 in 5 people use only a smart phone for online access compared with 1 in 10 in 2020

With regards to increased usage of smartphones only for online access the report suggests:

"More people are using only a smartphone to go online. People were more likely in 2021 than in 2020 to only use a smartphone to go online (21% vs 11% in 2020). There could be many reasons, but this may be because people were spending more time at home in late 2020 and early 2021 than in late 2021, and therefore used a wider range of devices. It may also reflect the larger screen size and better-optimised app functions of many smartphones, making them easier and potentially more cost-effective to use as a sole device for accessing the internet.

The Report goes on to states that:

"In September 2021 73% of the time spent online by UK online adults per day was on a smartphone. UK online adults are also spending slightly more time using tablets than computers, demonstrating that there is a clear preference for using mobile devices to go online. Those aged 25 to 34 spend the highest proportion (85%) of their online time using a smartphone, followed by 35-44s (80%); 15-24s (78%); 45-54s (74%) and those aged 55+ (55%)."

Without the improved network coverage and capacity that the proposed essential infrastructure will bring, the operator's network users living, working and travelling in the local area, and those of the associated MVNOs, will not benefit from reliable mobile digital connectivity when using their smartphones for business, education and personal purposes.


Demand and Expectation

The dynamic nature of technological advances in the telecommunications industry coupled with ever increasing demand from subscribers dictates a continual reinvestment programme on the part of licenced operators and as a result, and in line with their licence requirements, companies such as the applicant are constantly developing, refining and modernising mobile network infrastructure.

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To set the scene on the growing demand for effective communications networks over recent years the applicant would refer the reader to the following Ofcom publications. One would first draw attention to an Ofcom discussion paper publication entitled 'Mobile Networks and Spectrum'^[2], dated 09 February 2022, which considers the future demand for mobile services encouraging longer-term thinking about spectrum for mobile networks and how consumer and business needs can be met. Section 2 of the paper includes the following information under the subheading 'The growth of mobile':

"In the UK there are four Mobile Network Operators (MNOs) – EE, Three, Virgin Media O2 and Vodafone. The MNOs also provide wholesale mobile access to many mobile virtual network operators (MVNOs), such as Tesco, iD (Carphone Warehouse), Sky Mobile and others.

In recent years we have seen an average 40% year-on-year growth in demand for mobile services provided over public mobile networks. This growth has been driven by the development of new applications and enabled by evolving technologies and consequent changes in consumer behaviour.

We expect demand for mobile data will continue to grow as we rely on it ever more to carry out daily activities like shopping, gaming, banking and watching movies. Demand is likely to be stimulated further as new and more sophisticated applications are developed, and by the development of machine-to-machine and machine-to-device applications."

Paragraphs 2.5-2.7

In publishing the discussion paper, Ofcom welcomed stakeholder inputs on the initial thinking, including on the potential opportunities and challenges associated with network densification in the UK and whether there are opportunities for more spectrum to be made available for mobile use on a local basis, so that they may then develop a future strategy for mobile spectrum.

Following on from the above, a conclusions paper has since been published by Ofcom on 06 December 2022, entitled 'Ofcom's future approach to mobile markets and spectrum' within which Section 1 'Overview' confirms:

"We expect demand for mobile data to continue to grow as greater use is made of data-hungry services and as new technologies enable new uses."

Paragraph 1.1

And continues under the subheading 'Our future approach':

"Network quality is likely to be of growing importance to customers."

So, there should be no doubt that there is a customer expectation and Ofcom requirement for continued investment by operators to ensure network quality and improvement where necessary.

Who will be affected by a lack of coverage and capacity?

In considering the merits of the subject full planning application for essential infrastructure, it is important to give due cognisance to those that would be impacted upon if the current network requirement for the operator(s) in question were not to be addressed.

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The following paragraphs will provide some context on this issue using recent statistics and data.

According to a www.which.co.uk article updated 27 April 2023 and titled 'Who are the biggest UK mobile networks', the approximate percentage of mobile device users in the UK market using VMO2 and Vodafone Limited networks are as follows:

- Vodafone Limited, (a Mobile Network Operator - MNO), and their Mobile Virtual Network Operators which use their network (MVNOs) (i.e., Asda Mobile, Lebara, Talk Mobile and Voxi), make up approximately 21% of mobile device user market in the UK.
- VMO2 (a Mobile Network Operator - MNO), and their Mobile Virtual Network Operators (MVNOs) which use their network (i.e., GiffGaff, Sky Mobile, Tesco Mobile, Lycamobile and Virgin Mobile), make up approximately 29% of mobile device user market in the UK.

It is therefore fair to assume that at a similar pro rata percentage of the mobile device users in the local area will be relying on the operators in question to provide an effective and long-term solution for UpToDate mobile network coverage and capacity at the earliest opportunity.

Economic and Social Benefits

The Planning and Compulsory Purchase Act (2004) requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The policy guidance set out within the NPPF is considered to be a material consideration which attracts significant weight in the decision-making process.

The statutory requirement set out within the Planning (Listed Buildings and Conservation Areas) Act 1990, at Section 66(1) directs that considerable weight should be given to the preservation of the historic and architectural interest of Listed Buildings and their settings.

In addition, the NPPF states that the impact of development proposals upon the particular significance of heritage assets such as Listed Buildings and WHSs should be considered. It is also important to consider whether the proposals cause harm to the significance of these assets. If they do, then one must consider whether any such harm represents 'substantial harm' or 'less than substantial harm' to the identified designated heritage assets, in the context of paragraphs 201 and 202 of the NPPF. With regard to non-designated heritage assets, potential harm should be considered within the context of paragraph 203 of the NPPF.

The PPG clarifies that within each category of harm ('less than substantial' or 'substantial'), the extent of the harm may vary and should be clearly articulated.


The guidance set out within the PPG states that substantial harm is a high test, and that it may not arise in many cases. The PPG makes it clear that it is the degree of harm to the significance of the asset rather than the scale of development which is to be assessed. In addition, it has been clarified in a High Court Judgement of 2013 that substantial harm would be harm that would "*have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced*".

As defined in the NPPF:

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*"Significance derives not only from a heritage asset's physical presence, but also from its setting."*²¹

Setting is defined as:

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage value.

With regards to changes in setting, GPA 3 states that:

"Conserving or enhancing heritage assets by taking their settings into account need not prevent change".

Additionally, it is also important to note that, as clarified in the Court of Appeal, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused.

Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage values and hence the significance of the assets concerned.

As detailed further in Section 6, the NPPF (at Paragraphs 201 and 202) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Any 'heritage benefits' arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the Decision Maker.

The PPG provides further clarity on what is meant by the term 'public benefit', including how these may be derived from enhancement to the historic environment ('heritage benefits'), as follows:

"Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:


- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*

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- *securing the optimum viable use of a heritage asset in support of its long-term conservation.*"

It can be demonstrated that the proposals would serve to preserve the overall heritage significance of the identified heritage assets. Thus, Planning Permission should be granted as per the requirements of paragraph 38 which state 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. Decisions-makers at every level should seek to approve applications for sustainable development where possible.

It is not considered that the change resulting from the proposals would impact upon the overall architectural and historic interest of the historic asset. In particular, the proposals will not impact upon the way the architectural detailing of the asset is experienced and appreciated from its surrounds, where possible. The level of harm is therefore at the lower end of less than substantial harm.

When telecommunications proposals are considered, it is necessary to carry out the balancing exercise weighing the need for development and the magnitude of public benefits of the proposed base station against the perceived concerns about the development's visual impact and availability of alternative locations and the possibility to design the scheme differently without impacting the operational needs of the operator.

As has already been presented, there is a clear and demonstrable need for an upgraded radio base station in the area which will support the Mayor of London's aspirations for World Class Connectivity.

The NPPF strongly supports sustainable development as does the London Plan and the Camden Local Plan. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with the NPPF and Camden's Local Plan to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

There have been numerous appeal decisions where the Inspector has attached significant weight to the benefits, alternative options, technical constraints and NPPF in a balancing exercise of all the valid material considerations, including visual impacts and the impact on residential amenity.

It is therefore clear that the Government places significant importance on reliable communications and as such the Planning Inspectorate gives significant weight to the public benefit arising from local service provision. The issue of benefits and planning balance is considered in Appeal Ref: APP/L1765/W/18/3197522 Land at junction of Andover Road and Athelsan Road, Winchester. The proposal related to the installation of a 17.5m street works pole and associated equipment cabinet at land at the junction of Andover Road and Athelstan Road, Winchester.


The Inspector found at Paragraph 9 *'The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "Advanced, high quality and reliable communications infrastructure is essential for economic*

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growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections". In this instance, the proposal is not so much seeking to provide significantly higher standards but to maintain recent local provision of 2G, 3G and 4G services as a result of a notice to quit from a nearby site that was providing these services. The Council has commented that service provision would be 'adequate' without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision'.

The issue of benefits and planning balance was also considered in Appeal Ref: APP/X5990/W/16/3162918, 55 – 59 Oxford Street, London, W1D 2EQ. The Inspector found at Paragraph 20:

'Whilst I have paid special attention to the desirability of preserving or enhancing the character and appearance of the conservation area, the above factors lead me to conclude that there is less than substantial harm to the character and appearance of the existing building and the Soho Conservation Area'.

Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

There is a demand for mobile connectivity in areas where geography, logistics or economics – or a combination of all 3, make it difficult. Mobile network capacity needs to grow to meet the demand of mobile users, who are consuming ever increasing amounts of data.

Maintaining high quality 2G, 3G, 4G and 5G coverage and capacity in this area fully meets this part of the NPPF. The social and economic benefits are a significant material consideration which should be weighed against the visual impact associated with a radio base station in this location. HM Treasury outlined such benefits in its report *'Fixing the Foundations: Creating a More Prosperous Nation'* – July 2015. Paragraph 7.1 of the plan stated that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

Paragraph 7.2 goes on to highlight strong support for high quality communications infrastructure. It states


'by reducing red tape and barriers to investment, the Government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The Government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published March, of near universal 4G and ultrafast broadband coverage.'

Indeed, MPs have noted in parliament that the UK's Superfast Broadband connectivity was 'relatively poor'. As such, there is continuing and growing strong national support for high quality communications

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infrastructure. Further to the Government's commitment to improve connectivity, on 24th November 2016 the new permitted development rights for telecommunication operators came into force, designed to lift the restrictions on mobile operators such as the significance and weight the Government place upon the benefits attached to modern connectivity.

In October 2016, there was also the BIG Infrastructure Group (as Chaired by MP Grant Shapps) Report release calling on operators to improve their network. This is signed and has comments from numerous MP's nationally.

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016 ([https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-\(1\).pdf.aspx](https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-(1).pdf.aspx)). It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

'A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global market place. Securing digital connectivity is thus critical to the UK's long term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases'.

The Assessment goes on to note that *'Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy'*. Therefore, this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of providing improved 5G services to this very busy area of the capital, where the social and economic benefits outweighed the environmental considerations.

Ministers from the DCMS and MHCLG wrote to all CEOs of Council's in England (March 2019) setting out its position in respect of supporting investment in high-quality, reliable digital connectivity. The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion. Ministers state:

'It is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. As outlined in the Future Telecoms Infrastructure Review, the Government would like to see nationwide full fibre coverage by 2033. We would also like the UK to be a world leader in 5G, with the majority of the population covered by a 5G signal by 2027. We are writing to ask for your help in supporting the investment necessary to achieve these objectives.

Recent years have seen substantial investment in mobile and fixed digital infrastructure across the UK.


While mobile coverage across the UK has been significantly improving, there are still too many areas where coverage is poor. The UK has now achieved 95% superfast broadband coverage but still only 6% full fibre coverage.

We need to create the market and policy conditions necessary to support the large-scale commercial investment required to extend and future-proof digital connectivity. A key part of this is making it easier for operators to deploy infrastructure. To help to achieve this, the Government recently reformed the Electronic Communications Code - the statutory framework which underpins agreements between communications network providers and those in both the private and public sector who can provide

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sites for the installation of network equipment. The purpose of the reforms was to make it easier and more cost effective for communications network providers to deploy and maintain digital infrastructure.

Local authorities have an essential role to play as site providers. As Chief Executives, you can support investment in digital communications infrastructure by ensuring your organisations have policies and procedures in place that promote effective engagement with the digital communications industry and minimise barriers to deployment'.

The upgraded radio base station installation in this location will allow both VMO2 and Vodafone to improve 4G mobile and provide new 5G communications supporting the Government's aim of 'focusing on ensuring that everyone is connected to the information superhighway' as well as the 'Levelling Up' White Paper mission which acknowledges the role 'Digital Connectivity' plays in the moral, social and economic programme for the whole of government. The proposal therefore fully meets the aspirations of the NPPF and Camden's Local Plan in general terms.

Levelling Up White Paper

The Levelling Up White Paper published by the Government on 02 February 2022 sets out how the Government will spread opportunity more equally across the UK stating, "Levelling up is a moral, social and economic programme for the whole of government'.

'Digital Connectivity' is a focus area of the White Paper with the Government's 'Levelling Up Mission' being "By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population".

The case for action in respect of Digital Connectivity' states (inter-alia):

"The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation. Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working. However, there are significant spatial disparities in the quality of broadband and mobile networks, with rural areas likely to experience worse digital connectivity than urban areas. Infrastructure is only part of the picture: economic benefits will only materialise if businesses and workers have the skills to take advantage of improved infrastructure.

The policy programme In 2020, the UK Government published the National Infrastructure Strategy, committing to providing £5bn in public funding to roll out gigabit broadband to at least 85% of the country by 2025, and subsequently to as close to 100% as possible, working with the private sector.


Public investment will target premises that are hardest to reach and which would otherwise not be provided for by the private sector, ensuring no areas are left behind. Gigabit coverage has increased from 10% to over 60% in less than two years. Since 2019, coverage has improved across the UK, and the UK Government anticipates the following additional improvements to be delivered as a minimum by 2025, as set out in Figure 3.1.

The UK Government has also agreed a £1bn deal with mobile operators to deliver the Shared Rural Network programme. This will see operators collectively increase 4G coverage to 95% by

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Cornerstone Industry Site Specific Supplementary Information (England) V.5 – 21/03/2022

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2025. As a result of this collaboration, the vast majority of the UK will soon benefit from improvements to digital connectivity.

5G has the potential to radically change the way people live and make businesses more productive and competitive. The UK Government's ambition is for the majority of the population to have access to a 5G signal by 2027. Since 2017, the UK Government has provided £200m in funding for 5G Testbeds and Trials, supporting over 200 startups and SMEs across a range of sectors – including healthcare, manufacturing, Agri-Tech and creative industries – to better understand how to use the technology to develop new solutions and services.

In 2022, the UK Government will publish the Wireless Infrastructure Strategy. This will review how far the private sector will go to deliver wireless infrastructure – including 5G – across the country, and determine whether there are any market failures in places that need to be addressed, and how the UK Government could tackle these.

We must ensure that people have sufficient digital skills to reap the benefits and prosperity arising from the digital economy. In 2020, the UK Government introduced a new digital skills entitlement, giving adults with low or no digital skills in England free access to new digital skills qualifications based on employer-supported national standards. The UK Government continues to work with local leaders to develop Local Digital Skills Partnerships. These collaborative partnerships are now operating in seven regions across England, with an eighth formally launching in Hull and East Yorkshire in early March. The UK Government will work with devolved administrations to consider how best to share the insights and evaluation of the programme to help build digital skills capability across the UK".

It therefore clear that 'Digital Connectivity' underpins the delivery of the ' Levelling Up' agenda.

Health and Safety

The proposed installation conforms to current government planning guidelines regarding potential health effects arising from telecommunications development. The operator has attached a declaration that the site conforms to ICNIRP guidance. This is in full accordance with NPPF.

Recent court cases have confirmed that the *public perception* of health risks can be a material consideration within the land-use planning system. The weight to be attached to this issue has to be determined accordingly in each case by the decision maker. It has been generally held, and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been demonstrated that the proposed installation will comply with the ICNIRP guidelines.


The publication of the National Planning Policy Framework continues to highlight the Governments view that the planning system is not the appropriate mechanism for determining health safeguards. It sends a clear message to local planning authorities stating that they must 'determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure'. This is reiterated in the Code of Best Practice.

In this instance, Telefonica (VMO2) and Vodafone believes that it is not necessary to consider health effects further, as recommended by NPPF. The operator is committed to ensuring that all new and existing installations are ICNIRP compliant, and consequently it is considered that there is no basis for

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this application to be refused on health and safety grounds or for reasons relating to public concerns about health and safety. ICNIRP compliance certificates are enclosed for the operator with this application. If required, additional information regarding the operation of mobile telephone base stations and health and safety considerations can be provided.

Summary

The proposed amendments to the existing Cornerstone base station are minor in nature but will enhance the customer experience for both VMO2 and Vodafone which utilise the Cornerstone infrastructure to ensure that the operator’s customers are able to continue to utilise their handheld devices for the purposes in which they were purchased. Customers will also be able to utilise their 5G compatible handheld devices as demand for this latest technology increases.

On balance, the minor amendments to the radio base station on the rooftop of the host building will not have a detrimental impact on the character and appearance of the host building, Bloomsbury Conservation Area and the surrounding area which is commercial in character. However, the amendments will provide enhanced 2G, 3G and 4G coverage and capacity to the surrounding area and new 5G services. Thus, providing a high-quality service to its customers and access to the latest technologies whenever and wherever they are. Thus, any perceived harm will be outweighed by the benefits associated with providing and maintaining the very latest high-quality communications in line with NPPF.

Site selection was progressed in accordance with licence obligations, advice in the NPPF and the Code of Best Practice and represents the least environmentally intrusive, technically suitable, available option.

The social and economic benefits of providing reliable and high quality mobile broadband connections including 5G support growth in productivity, efficiency and labour force participation across the whole economy. This is fully supported by the NPPF, London Plan and Camden Local Plan. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area or less than substantial harm to the Bloomsbury Conservation Area.

Confirmation that submitted drawings have been checked for accuracy


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Signed:

Consultant Town
Planner

Date:


31.05.2023

(on behalf of
Cornerstone)

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