

<b>Delegated Report</b>		<b>Analysis sheet</b>		<b>Expiry Date:</b>	12/07/2021
		N/A		<b>Consultation Expiry Date:</b>	12/07/2021
<b>Officer</b>			<b>Application Number(s)</b>		
Josh Lawlor			2021/2444/P		
<b>Application Address</b>			<b>Drawing Numbers</b>		
The Dutch House 307 - 308 High Holborn London WC1V 7LL			See Decision Notice		
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>		
<b>Proposal(s)</b>					
Installation of 1 antenna on wall mounted pole to replace existing 1 x antenna, installation of 2 x antennas on tripod fixed to existing steel platform to replace existing 2 x antennas and addition of ancillary development including 1 x GPS module and ERS units.					
<b>Recommendation(s):</b>		Refuse Planning Permission			
<b>Application Type:</b>		Full Planning Permission			

<b>Conditions or Reasons for Refusal:</b>	<b>Refer to Draft Decision Notice</b>					
<b>Informatives:</b>						
<b>Consultations</b>						
<b>Adjoining Occupiers:</b>	No. notified		No. of responses	<b>00</b>	No. of objections	<b>00</b>
<b>Summary of consultation responses:</b>	<p>A site notice was displayed near the site on 18.06.21 (expiring 12.02.21)</p> <p>A press notice ran from 24.06.21 (expiring 18.07.21)</p> <p>No response was received</p>					
Bloomsbury Conservation Area Advisory Committee	A letter was sent on 06.07.2021 and no response was received.					

## Site Description

The site is a nine-storey commercial building on High Holborn's south side. The Dutch House is an existing telecoms base station. The site is in the Bloomsbury Conservation Area but is not identified in the Appraisal. The site is in sub area 8 which is characterised by areas of large-scale, late 19th and early 20th century blocks fronting busy thoroughfares

## Relevant History

**2019/1466/P** External alterations including replacement of 3 x existing antennas, 1 x dish and 1 x cabinet with 6 x new antennas, 1 x dish and 2 x equipment cabinets (sited in internal room) and installation of 9 x Remote Radio Units. **Granted 30/09/2019**

**2020/1962/P** Installation of telecoms equipment at roof level including 3 x antenna fixed to existing support pole, 1 x GPS Module, 3 x. combiners and 1 x existing VF Antenna to be raised 500mm on existing pole, ancillary equipment, including Remote Radio Units **Granted 20/07/2020**

**2023/0687/P** Installation of 2 additional antennas, 2 transmission dishes and 3 equipment cabinets to roof with ancillary work. **Granted 26/04/2023**

## Relevant policies

**The National Planning Policy Framework (NPPF) 2023** - Chapter 10 Supporting high-quality communications

### London Plan 2023

### Camden Local Plan 2017

Policy D1 Design

Policy D2 Heritage

Policy A1 Managing the impact of development

### Camden Planning Guidance

- [Digital Infrastructure - March 2018](#)
- [Amenity - January 2021](#)
- Design - January 2021

Bloomsbury Conservation Area appraisal and management strategy 2011

## Assessment

### 1. The proposed development

1.1. The application permission for one antenna to be removed and replaced with one no. new antenna on a new wall-mounted pole at a height of 31.10 metres. The proposed installation of two no. antennas to be removed and two no. new antennas are to be relocated and mounted on the proposed tripod fixed to the existing steel platform at 31.10 metres. The proposed addition of ancillary development, including one GPS module and one Emergency Response System unit. The proposed apparatus shall be installed to the north and south of The Dutch House's rooftop, an existing telecoms base station.

### 2. Assessment

2.1 The principal considerations in the determination of this application are:

- Meeting the NPPF requirements for telecommunications development
- Design and Heritage – Impact on the character and appearance of the host building, street scene, and conservation area;
- Amenity – Impact on neighbouring amenity

### 3. Principle of Development

3.1 The NPPF requires Local Planning Authorities to keep the number of radio and electronic communications masts and the sites for such installations to a minimum, consistent with the needs of consumers, the efficient operation of the network, and to provide reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks or connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.

3.2 The NPPF requires applications for telecommunications development to be supported by the necessary evidence to show that the proposed development would not cause interference to other electrical equipment, air service or instrumentation operated in the national interest, including details of pre-consultation with local schools and colleges, a statement that certifies that the development would not exceed the International Commission on non-ionising radiation protection (ICNIRP) guidelines, and evidence that the applicant has explored the possibility of erecting antennas on an existing mast. The NPPF also requires Local Planning Authorities to keep the numbers of radio and telecommunications masts to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.

3.3 The proposed radio base station is required in this location to improve the existing network's coverage and capacity and to future-proof future demands by mobile users with the rollout of 5G. The proposed height and structure type will also cater for 4G and future 5G coverage demands, enabling network restructuring towards a single grid network that can serve both operators.

#### Interference with existing telecommunications equipment

3.4 The applicant has submitted evidence demonstrating that the proposed equipment would not interfere with nationally significant telecommunications or electronic infrastructure.

#### Consultation with Local Schools

3.5 UK Government Research in the Stewart Report (2000) advocated a precautionary approach to telecommunications development and identified that children are more susceptible to telecommunications radiation. The NPPF does not refer to the precautionary approach directly but does carry forward the principle of considering the siting of masts close to schools through the requirement for developers to pre-consult with local schools.

3.6 No evidence of consultation with local schools has been submitted as part of this application, as the application documents state that no school has a close relationship with the site.

#### Impact on Health

3.7 The NPPF states that Local Planning Authorities (LPA) should not determine health safeguards if the proposal meets International Commission guidelines for public exposure, provided an ICNIRP certificate has been submitted.

3.8 An ICNIRP certificate (dated 6<sup>th</sup> February 2017) has been submitted.

#### Use of existing masts/sites sharing

3.9 The NPPF requires considering siting the proposed equipment on existing masts in the area and requires the overall number of masts to be kept to a minimum for efficient network operation.

3.10 In accordance with the operator's licence obligations, NPPF and the Code of Best Practice on Mobile Phone Network Development, Cornerstone have reviewed existing telecommunications provision operated by Vodafone and Telefónica in the intended target area. An existing base station has been identified, and a sequential approach to site selection has been taken to upgrade this installation.

### **4. Design and Heritage**

4.1. Policy D1 of the Camden Local Plan seeks to secure high-quality design in development, explicitly requiring development to respect local context and character, preserve or enhance the historic environment and heritage assets in accordance with Policy D2, and preserve strategic and local views. Policy D2 states that the Council will seek to protect heritage assets and non-designated heritage assets; the effect of the proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

4.2. Policies D1 and D2 are supported by the Council's Design CPG and Digital Infrastructure CPG. The increase in mobile phone users is leading to an increased demand for telecommunications equipment by operators. Masts are frequently mounted on tall buildings and could be prominent within the Conservation Area.

4.3. The wall mounted antenna/pole is acceptable in terms of location as it is set back from the roof edge. The installation of two antennas on tripod fixed to an existing steel platform on the edge of the roof facing High Holborn (north west), would be visible from street level. It is an incongruous feature, creating visual clutter that would harm the character and appearance of the host building. Although the building is not architecturally distinguished or noted as making a positive contribution to the character of the conservation area in the appraisal, the appearance of the roofline along High Holborn is an important aspect of this part conservation area. This proposal has not been sensitively designed to preserve this relatively consistent roofline as far as possible.



5.2. Given the location of proposed poles and antennas at roof level and distances from residential windows, there would not be a loss of light or outlook to nearby occupiers. The applicants have declared that all the proposed equipment would comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) standards on emission levels. Thus, the equipment is not anticipated to impact public health directly.

## **6. Recommendation**

### **6.1 Refuse planning permission for the following reason:**

- 1. The proposed pole mounted antennas located on the roof edge fronting High Holborn, by reason of its siting and design, would be detrimental to the appearance of the host building and character and appearance of the Bloomsbury Conservation Area, contrary to policy D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017 and the National Planning Policy Framework 2021.*