

Town Planning Statement

Upgrade to Electronic Communications Base Station

At the Existing Cellnex Site

**Harrison Street TE, 30-40 Harrison Street, Camden, WC1H 8JF (NGR
E: 530470 N: 182620)**

Site Reference: COM-0026651

Cellnex UK and CTIL

April 2024

1. INTRODUCTION

- 1.1 This statement is submitted in support of an application for planning permission for an upgrade to an existing established site for the mobile network operators (MNOs) Vodafone Ltd and Telefónica UK Ltd, in conjunction with Cornerstone Telecommunications Infrastructure Ltd (CTIL). The application site is owned / operated by Cellnex UK, a radio site infrastructure provider.
- 1.2 The application includes:
- A description of the site and surrounding area
 - A description of the proposal
 - A statement of community engagement
 - A review of planning policy considerations
 - A review of design and access considerations
- 1.3 A number of other accompanying documents have been submitted in support of the application and these are referred to and must be read in conjunction with this statement.

2. SITE AND SURROUNDING AREA

- 2.1 The proposal is for the upgrade of an existing rooftop site at the Harrison Street Telephone Exchange located in the Bloomsbury district of Central London. The site is a large, unlisted, three storey building of brick construction which has a utilitarian appearance that reflects its function, and hosts various electronic communications apparatus installed at main and lower roof levels. The Harrison Public House stands adjacent to the east of the building, and there are residential buildings to the west, south and north. The surrounding area of the site is densely developed with the nearby buildings consisting of large apartment complexes, in addition there are mature trees along Harrison Street, Seaford Street and Regent Square which aid the attenuation of the rooftop structures at pedestrian level. The site occupies a rooftop central urban location, with commercial and residential development within close proximity to the building. As a central site, it is in an area with a high demand for mobile network services and located at roof level, the rooftop masts are well located and able to serve this busy central area while remaining largely out of sight for passing pedestrians.
- 2.2 The proposal, is for an upgrade to facilitate essential new 5G coverage at this central location and involves the installation of replacement antenna and ancillary equipment onto new antenna support poles along with upgrades to equipment cabinets, and ancillary development thereto.



Summer view of existing structure at east of building from Seaford Street (SE Elevation)



Summer view of existing structure at west of building from Harrison Street (NW Elevation) Source: Google Maps

3. THE 5G PROPOSAL

- 3.1 The development proposed is shown in detail in the drawings submitted and is for a 5G upgrade to an electronic communications base station at the existing rooftop masts. The deployment of 5G will utilise the MNOs existing 3G and 4G networks such as the base station already existing at the application site. As such, the application site is likely to carry different mobile connectivity services in parallel, with high data uses operating through the new 5G higher capacity network apparatus subject of this application.
- 3.2 Unlike earlier generations of mobile connectivity, 5G has more significant technical and operational requirements and this has implications on the amount, height, position and design of the new base station. To help explain this important detail, we have set this out in the accompanying “**5G Technical Support**” document, which must be read in conjunction with this planning statement.
- 3.3 The principal elements of the proposed development at the application site reflect these various siting and design factors within the technical support document:
- The installation of 2 no. replacement antenna support poles to accommodate 3 no. replacement antenna and ancillary radio equipment at existing rooftop site.
 - The installation of cabling and associated development.
 - Ancillary development thereto.
- 3.4 The host building has a roof level height at 17.6m and the new support poles required to support new 5G equipment along with existing equipment will slightly reduce the overall height of the mast at the east of the building and will increase the overall height of the mast located at the west of the building by 1.1m.
- 3.5 The established existing radio equipment housing will need to be mechanically ventilated to avoid overheating of equipment. The ventilation equipment is only likely to operate during the day during hot weather. This is as established at the site.
- 3.6 Paragraphs 16 and 17 of the Code of Practice for Wireless Network Development in England, published in March 2022, explains how mobile networks operate. In the

annual network rollout information supplied, the operators will have explained their network requirements for 5G and the anticipated use of existing sites, including those owned by radio site infrastructure providers like Cellnex UK.

- 3.7 The application site has been selected by the operator as this will provide the required level of 5G network coverage while properly meeting national town planning policy objectives for the shared use of existing electronic communication sites, in this case owned / operated by Cellnex UK.

4. PRIOR ENGAGEMENT

- 4.1 The recently revised National Planning Policy Framework (NPPF) and the Code of Practice on Wireless Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received 'green' when assessed against the traffic light rating model as referenced the Code of Practice. We have written to the local ward councillors representing the ward and no comments or concerns have been received.

- 4.2 In our engagement letter with you we sought to agree with you the appropriate traffic light rating and associated engagement requirements and obtain your comments on the siting and design of the development. We have not received any response from your authority and accordingly we would be pleased to address any necessary matters within the determination period of the application.

5. PLANNING POLICY

5.1 The relevant planning policy and best practice framework is found principally within:

- National Policy, especially the National Planning Policy Framework (NPPF)
- The local policy framework set out in the adopted Development Plan
- The Code of Practice on Wireless Network Development in England

5.2 From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development. As planning authority, you will be familiar with this framework and so in the interests of brevity, we do not rehearse it back to you in detail but address instead the principal themes to demonstrate that the application accords with them.

National Support for Modern Communications

5.3 There is significant UK Government support for the delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. Our accompanying document of national policy '**National Policy - Delivering Ultra Fast Broadband Mobile Connectivity**', sets out how 5G mobile connectivity will underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. It is essential that the planning system looks to support and facilitate new 5G base station installations such as that proposed to meet the Government's Digital Strategy. In addition, modern connectivity, such as 5G, will be essential to help the Government meet its wider sustainability and climate change targets and we explain this in more detail in our accompanying document '**5G – Helping tackle climate change**'.

Balancing operational and environmental considerations

5.4 The special operational and technical factors that require specific siting of a 5G base station should be balanced by the need to minimise environmental and visual impact.

- 5.5 However, there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs for 5G, the NPPF now applies a reduced policy test compared to previous guidance. This helps to clarify that an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the ‘optimum’ solution as required under the former PPG8.
- 5.6 In balancing these requirements, the starting point for the 5G networks or the expansion of existing networks is to use existing electronic communications sites owned by other operators or radio site management companies such as Cellnex UK. This policy objective is backed with the statutory obligation placed upon operators to share apparatus, where practicable out under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.
- 5.7 In this instance, the installation of apparatus at this existing site owned or managed by Cellnex UK, where there are existing operations which are suitable for electronic communications use by virtue of the existing structures aligns with this longstanding policy.
- 5.8 As a matter of principle, the development proposed is in accordance with the relevant policy framework and should therefore be acceptable. In the next section, the Design Considerations are reviewed to demonstrate that the detail of the development is also acceptable and that in accordance with the presumption in favour, planning permission should be granted.

Local Policy Considerations

- 5.9 At the local level, the proposal has been considered against local policy. The Camden Local Plan adopted in 2017 does not include any explicit policies regarding telecommunications. However, paragraph 5.10 titled ‘Digital Infrastructure’ states “*The Council recognises the importance of digital infrastructure in enterprise development and expects electronic communication networks, including telecommunications and high speed broadband, to be provided in business premises*”. The proposal has been

considered against the NPPF which sets out government's planning policies for England and how these are expected to be applied.

- 5.10 The NPPF supports the provision of high quality and reliable communications infrastructure to deliver economic growth and social wellbeing. Planning policies should support the expansion of electronic communications networks, including next generation mobile technology, such as 5G.
- 5.11 The NPPF states that the numbers of radio and telecommunications masts and the sites for such installations should be kept to a minimum, consistent with the needs of the consumer, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures should be encouraged. The current proposal which seeks to upgrade an existing shared rooftop site and prevents the need for a new base station.
- 5.12 It is acknowledged that the proposal results in a height increase for one of the structures, however this has been kept at the operational minimum to accommodate the upgrade with the least additional visual impact. This additional height is unlikely to result in unacceptable additional visual impact over the existing.
- 5.13 The proposed development is considered to strike the best balance between meeting the specific network requirements for the operators and minimising environmental impact.

6. DESIGN CONSIDERATIONS

6.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended. However, to assist your consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations. Due regard has been given to the factors addressed from Paragraph 20 of the Code of Practice.

Physical Context

6.2 The application site currently accommodates an existing base station and is located on the rooftop of the Harrison Street Telephone Exchange where the existing antennas, and associated support structures serve a busy central area with a high demand for mobile network services. The surrounding area of the site is densely developed with the nearby developments primarily consisting of large apartment complexes. The site also benefits from the mature trees located along Harrison Street, Seaford Street, and Regent Square which provide a degree of screening of the site at the pedestrian level. The proposed upgrade of this well positioned site is preferable to seeking a completely new base station in the area.

Amount, Design, Layout and Scale of the Development

6.3 The scale, layout and design of the development has been guided by the special 5G technical and operational factors affecting the need to provide coverage to the local area, having regard to the need to minimise visual impact, already referred to above explained in detail in the '**5G Technical Support**' document. With regard to the main component elements of the development proposed:

Antenna Array

- The numbers of antennas have been kept to the minimum necessary to provide coverage and to link this site back into the operator's 5G network. The design of these features is very much driven by operational and technical factors. The upgrade does require new support poles to accommodate the new and relocated antenna which will result in a height increase of 1.1m for the westward facing structure, and a height decrease of 0.5m for the eastward

facing structure. This height increase is unlikely to result in a substantial additional detrimental impact upon visual appearance. The adjacent residential building does not have windows at that side of the building and the opposite buildings do not have frontage windows to Harrison Street except from the staircase. The minor height increase will have limited additional visual detriment. Further, any additional visual impact should be balanced against the improvements to local service.

Equipment Cabinets

- The number of radio equipment cabinets and their size has been limited to what is required to meet the operator's current and foreseeable network requirements. The equipment cabinets are as existing and are located at rooftop level within the BT site. The location and design of the equipment cabinets, and the electronic communications equipment housed within them, reflects their functionality and the technical and operational requirement to be in reasonable proximity to the antenna systems and dishes that they support. This avoids exceptionally large runs of feeder cables and associated supporting trays, and the subsequent loss of signals.

Access Considerations

- 6.4 Access to the site will be provided from the existing entrance to the Harrison Street Telephone Exchange on Harrison Street as existing.
- 6.5 Once constructed, the development will be unstaffed requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.
- 6.6 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Appearance

- 6.7 The sensitive approach to siting and design should minimise the appearance of the development proposed. The building accommodates existing mast structures, and this is an established feature of the area. The upgrade will increase the height of one structure and will accommodate existing and additional equipment. This will have an additional minor visual impact but is unlikely to be substantial in the context of the existing. As indicated earlier the site benefits from some attenuation from streetside trees and longer-range views are limited and seen against the sky and in the context of a busy urban scene. Further the residential buildings in proximity do not have a direct outlook at the rooftop equipment. The upgraded apparatus should look straight forward in appearance as existing and reflect its function the upgraded structure will in time become accepted features of the local environment.

7. HEALTH AND SAFETY

- 7.1 In support of the application, we include a separate document called '**5G Health and Safety**' which sets out in more detail the associated health and safety considerations. Every installation on a site owned or managed by Cellnex UK will be compliant with international standards adopted by the UK Government. A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.
- 7.2 The ICNIRP guidelines seek to protect against the well-known thermal effects of radio emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.
- 7.3 National planning policy remains clear, provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines through the refusal of planning permission.

8. SUMMARY AND CONCLUSIONS

- 8.1 In summary, the application is in respect of a 5G electronic communications base station necessary to improve a vital network that provides public services.
- 8.2 The service provided by the operator is in the public interest and is in very high demand with 5G being the next and highly significant advancement in mobile connectivity. In the UK there are now more than 92.5 million subscriptions to mobile networks and mobile services now exceed fixed landlines in terms of customer numbers and usage.
- 8.3 The public interest of the system is clear from the considerable benefits that will flow, and it makes a significant and major contribution towards sustainable objectives.
- 8.4 The operator's requirement is in the context of network needs associated with a 5G cellular system. These impose particular locational and siting requirements which are even greater with 5G. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.
- 8.5 The operator has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:
- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Cellnex.
 - Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
 - Engagement in accordance with the Code of Best Practice procedures.
 - An examination of design options to try and minimise potential visual impact.
- 8.6 The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.
- 8.7 This statement and the other accompanying material has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in particular within the NPPF. In particular it is a form of development that is

specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.

- 8.8 In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one which the presumption in favour of granting approval applies.