

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	International Hall	Site Address:	International Hall, Brunswick Square, London, WC1N 1DJ
National Grid Reference:	530410, 182199		
Site Ref Number:	142902 01	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?	Yes	No
If no explain why: Other sources checked.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	20/07/2022
Name of contact:	The Chief Planning Officer

¹ Macro or Micro

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Summary of outcome/Main issues raised:

Pre application consultation was sent to the Camden Planning Department by tracked email on 20/07/2022. To date, no response has been received.

Following this consultation, a full planning application was submitted, under application reference 2022/4183/P, which was approved on 02/03/2023.

Since this application was determined, there has been an update to the ICNIRP safety guidelines. As a result of this update, the proposed development has been redesigned to conform with the updated ICNIRP guidelines. This redesign involves a minor change to the location and height of the proposed installation. Given the minimal scale of change to the proposal, and as will be further demonstrated in section 3 of this statement, owing to the ICNIRP guidelines there is no opportunity to reduce or set back the equipment any further, pre application consultation was not reissued to the Local Planning Authority.


Annual area wide information to planning authority

Has annual area wide information been provided?	Yes
If no explain why:	
<p>Summary issues raised:</p> <p>Cornerstones commercial relationship with VMO2 has changed, effectively increasing our independence to work with other companies in the deployment of mobile infrastructure. It means we no longer have visibility of VMO2 full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance.</p> <p>We aim to engage and work with the planning department at the earliest opportunity from when we are instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss our wider rollout. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity. Accordingly, an email was sent to the London Borough of Camden in November 2021, inviting them to engage and discuss the benefits of 5G rollout. It is not known if there has been any follow up correspondence on this, but lines of communication remain open, and if your Local Authority would like a meeting to discuss wider Cornerstone rollout plans then please advise.</p>	

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Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
<p>Outline of consultation carried out:</p> <p>The proposal was rated Green in accordance with the traffic light consultation model in the Code of Practice for Wireless Network Development in England (published 2022). The pre-application consultation plan adhered to this best practice guidance. Pre-application consultation was undertaken with the councillors of the Kings Cross Ward and residents of International Hall on 20/07/2022.</p> <p>As outlined above, following this consultation, a full planning application was submitted, under application reference 2022/4183/P, which was approved on 02/03/2023, and since this application was determined, there has been an update to the ICNIRP safety guidelines. As a result of this update, the proposed development has been redesigned to conform with the updated ICNIRP guidelines. This redesign involves a minor change to the location and height of the proposed installation.</p> <p>Given the minimal scale of change to the proposal, a notification of these changes and that a planning application is due to be submitted for this amended scheme, including providing drawings, was sent to with the councillors of the Kings Cross Ward on 08/08/2024.</p>			
<p>Summary of outcome/main issues raised (include copies of relevant correspondence):</p> <p>To date, no response has been received. Lines of communication remain open and any responses received post submission will be passed onto the local planning authority.</p>			


School/College

<p>Location of site in relation to school/college (include name of school/college):</p> <p>A search for schools and non-domestic childcare institutions was conducted via Ofsted and Department for Education databases. The nearest school found was The Mary Ward Centre (AE Centre), approximately 307m away. The nearest childcares found were Corams Fields Community Nursery and Corams Field Out of School Club, located approximately 97m away, Great Ormond Street Hospital Staff Nursery, located approximately 225m away and Collingham Gardens Nursery, located approximately 192m away.</p>
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<p>Outline of consultation carried out with school/college (include evidence of consultation):</p> <p>Owing to the distance, no consultation was undertaken with Mary Ward Centre (AE Centre). Consultation letters were sent to the managers of Corams Fields Community Nursery and Corams Field Out of School Club, Great Ormond Street Hospital Staff Nursery and Collingham Gardens Nursery on 20/07/2022.</p> <p>As outlined above, following this consultation, a full planning application was submitted, under application reference 2022/4183/P, which was approved on 02/03/2023, and since this application was determined, there has been an update to the ICNIRP safety guidelines. As a result of this update, the proposed development has been redesigned to conform with the updated ICNIRP guidelines. This redesign involves a minor change to the location and height of the proposed installation.</p>
<p>Summary of outcome/main issues raised (include copies of main correspondence):</p> <p>To date, no response has been received.</p>

Civil Aviation Authority/Secretary of State for Defence or the operator of the civil safeguarding area or defence safeguarding area notification (only required for an application for prior approval)

Will the proposed development be on a civil safeguarding area or a defence safeguarding area?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area or defence safeguarding area been notified?	Yes	No
<p>Details of response:</p> <p>N/A</p>		


Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	N/A – Full planning application	

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3. Proposed Development

The proposed site:

3.1 The application site is located within the London Borough of Camden, in the Bloomsbury area. The host building itself is a seven storey building, currently in use as university halls of residence. The site is located to the south of Brunswick Square Gardens, off of Brunswick Square. The host building itself hosts existing telecommunications equipment for several operators. Prior approval was originally granted in 1998 under application reference PS9705288R1 for the installation of telecommunication apparatus, and there have been several upgrades and subsequent new installations on this building since.

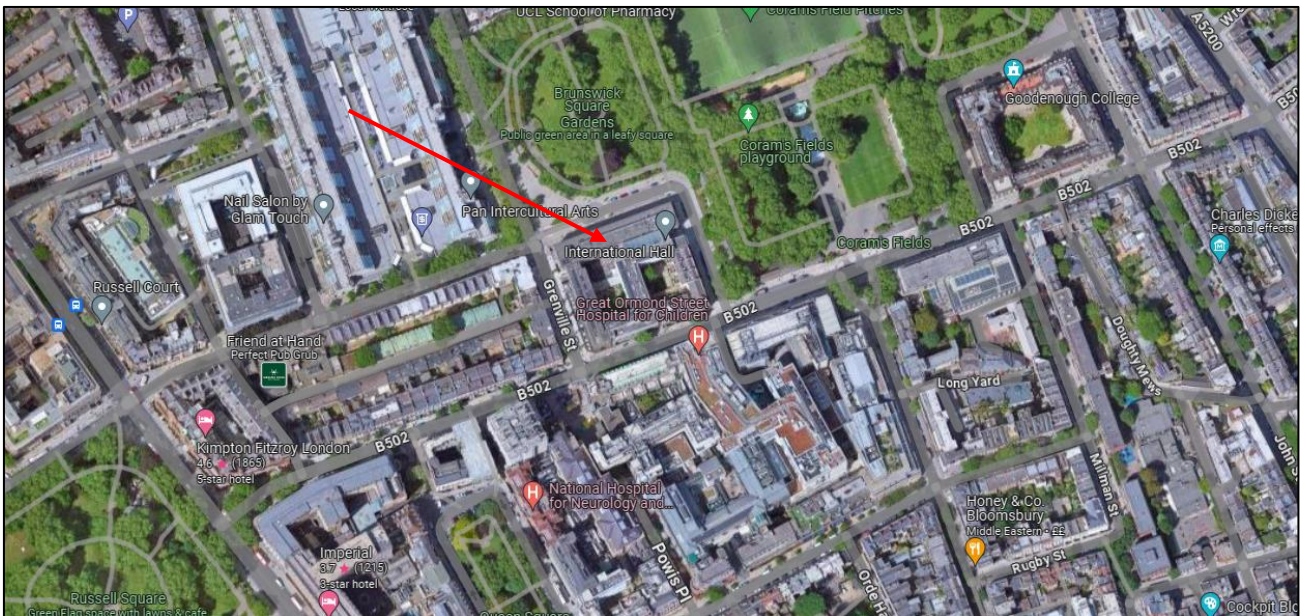


Figure 1: Aerial view of the application site and surrounding area, application site shown by red arrow (Source: Google Maps)


3.2 The surrounding area is typical of an inner city, urban environment, characterised by large multi storey blocks of flats and offices, terraced housing, interspersed with pockets of green space, and trees lining the streets. The site is also located within Bloomsbury Conservation Area.

3.3 VMO2 have identified a requirement for improved 3G and 4G coverage in the area, as well as the provision of new 5G coverage, providing the local area with high quality communications infrastructure, which brings with it a multitude of public benefits.

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- 3.4 The application seeks planning permission for the upgrade of mobile telecommunications apparatus to an already established telecommunications site. The proposed works consist of the removal of 2no antennas to be replaced with 4no new antennas, the addition of 2no 300mm dishes, 1no cabinet and ancillary works thereto. The proposed new antennas will be supported by 2No new support poles (2no. antennas on each support pole) fixed to support grillage.
- 3.5 A previous full planning application was submitted, under application reference 2022/4183/P, which was approved on 02/03/2023, for the removal of 2no antennas to be replaced with 4no new antennas, the addition of 2no 300mm dishes, 3no cabinets and ancillary works thereto. Since this application was determined, there has been an update to the ICNIRP safety guidelines. As a result of this update, the proposed development has been redesigned to conform with the updated ICNIRP guidelines.
- 3.6 This redesign involves a slight amendment to the location and height of the proposed antennas on the eastern side of the building. The antennas will sit 1.14m higher than the approved drawings. The amended antenna location is 2.75m away from the edge of the building, 1.65m closer to the edge than the approved drawings. The amended proposal also looks to install 1no cabinet instead of 3no cabinets.
- 3.7 The amendments to the proposal are a requirement in order for the installation to be ICNIRP compliant. 5G is a more complex technology than previous generations, this means that ICNIRP issues are more restrictive. Safety guidelines are not something the applicant can compromise on, and as such there is no opportunity to reduce the height/scale of the proposed equipment, or to move the equipment further away from the edge of the building.
- 3.8 The Applicant submits that the economic, environmental and social benefits which will be brought forward by the proposal will greatly outweigh any visual impact that may be caused by the installation of the scheme. The scheme is in accordance with national planning policy, and the direction of the travel of Central Government in providing local communities with high-quality telecommunications networks. This, more than ever, is of paramount importance.

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

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3.9 The 5G network is a unique technology and it requires a bespoke approach. It is not being rolled-out in the same manner as the previous 3G and 4G networks. We do appreciate that some Local Authorities have become accustomed to seeing a geographical coverage footprint of a new or upgraded site, where coverage plots were commonplace within applications. Unfortunately, the same is not available for the 5G network roll-out. There are no 5G network coverage plots being produced for individual cell sites as this is a very fast-moving project with the 5G network constantly evolving as more and more sites are added to the Operators' networks.


3.10 These 5G networks will build upon the existing 4G networks which will effectively form the infrastructure "spine" for this next generation of mobile networks. We respectfully remind all Local Authorities of the direction provided by the Government within the NPPF, i.e. that they should not seek to prevent competition between Operators or question the need for an electronic communications system (para 116), and also that the expansion of next generation mobile technology should be supported (para 114).

Type of Structure (e.g. tower, mast, etc):	
Description:	
The removal of 2no antennas to be replaced with 4no new antennas, the addition of 2no 300mm dishes, 1no cabinet and ancillary works thereto.	
Equipment Housing:	
1no. Percy PSU Outdoor Cabinet (725x850x2100mm)	
Overall Height:	22.94m (to top of antennas)
Height of existing building (where applicable):	16.9m (main roof level) 19.44m (plant room roof level) 19.9m (atrium roof level) 20.54m (upper roof level)
Equipment Housing: See above	
Length:	
Width:	
Height:	
Materials (as applicable):	

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Tower/mast etc – type of material and external colour:	Antennas – White plastic/steel Supporting structures – Galvanized steel
Equipment housing – type of material and external colour:	Steel painted light grey

<p>Reasons for choice of design, making reference to pre-application responses:</p> <p>3.11 The equipment's design is based on the principle of meeting operational requirements of the mobile operator VMO2, whilst minimising the impact on the context and visual amenity of the surrounding area, as far as technical constraints allow. The applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree.</p> <p>3.12 The base station has been designed to accommodate apparatus, allowing for improved provision of 3G and 4G mobile connections to the surrounding area. It has also been designed to accommodate new 5G technology, introducing ultra-fast mobile connectivity capable of operating the 'internet of Things'. This proposed infrastructure will provide higher mobile down-load speeds and more reliable, quicker phone connections. There would be increased capacity to provide services to a higher number of people at the same time.</p> <p>3.13 There are three main elements to a radio base station; the cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the links into the network either by fibre cabling or by dish antennas, power source (meter cabinet), feeder cables that link the equipment housing to the antennas and the various fixings, often referred to in general terms as "development ancillary to" the base station.</p> <p>3.14 The type of technology being deployed determines the type of equipment and antennas required, which in turn impacts upon the type of support structure and/or design methods than can be employed on an aesthetic level. In order for the base station to effectively provide coverage to the desired areas and fit in with the established network pattern, specific antenna orientations and heights, determined by the radio planners, must be achieved.</p>
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- 3.15 The antennas must be allowed to unrestrictedly emit a radio signal, meaning they cannot be shrouded or concealed and need to be sited at an elevated position, to enable the radio signal to clear surrounding structures, such as buildings and trees, with the aim of avoiding interference. The radio frequencies that 5G operates at is particularly sensitive to interference from solid objects, which necessitates securing the antennas at the height proposed.
- 3.16 The purpose of this upgrade is to provide improved 3G and 4G coverage, as well as brand-new 5G network coverage, for VMO2 to the surrounding area. In order to achieve this, the removal of 2no antennas to be replaced with 4no new antennas, the addition of 2no 300mm dishes, 1no cabinet and ancillary works thereto is required.
- 3.17 As previously mentioned, a previous full planning application was submitted, under application reference 2022/4183/P, which was approved on 02/03/2023, for the removal of 2no antennas to be replaced with 4no new antennas, the addition of 2no 300mm dishes, 3no cabinets and ancillary works thereto. Since this application was determined, there has been an update to the ICNIRP safety guidelines. As a result of this update, the proposed development has been redesigned to conform with the updated ICNIRP guidelines.
- 3.18 This redesign involves a slight amendment to the location and height of the proposed antennas on the eastern side of the building. The antennas will sit 1.14m higher than the approved drawings. The amended antenna location is 2.75m away from the edge of the building, 1.65m closer to the edge than the approved drawings. The amended proposal also looks to install 1no cabinet instead of 3no cabinets. These minimal changes result in a minimal change to the visual impact of the proposal in the context of the surrounding area.
- 3.19 The antenna height is determined by a specialist network radio engineer using specialist software which factors in the area that coverage is required, the relationship between the selected site location and existing cell sites in the linked network and variances in land levels and elements such as nearby trees or buildings, which can block or weaken signals.
- 3.20 The aforementioned factors have informed the type and height of the antennas and as such the necessary supporting structure. The proposed 4No. antennas are proposed to be supported by 2No. 5.5m support poles (holding 2No. antennas each), located on a steel grillage on the main roof

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level, with height to the top of the antennas measuring 22.94m above ground level. Although it is acknowledged that this is marginally higher than the previously approved scheme, as outlined throughout this document, this is a requirement in order for ICNIRP guidelines to be met, and there is no opportunity to reduce the height of the proposed equipment.

- 3.21 The antennas and supporting structures are proposed to be sited at the main roof level, on the eastern end of the building, towards the edge of the rooftop. Siting the replacement equipment towards the edge of the rooftop removes the requirement for larger scale supporting structures such as a stub tower, which would be more visually intrusive. The proposed antennas have been moved as far from the edge of the rooftop as possible, and antennas proposed at the lowest height possible, in order for the installation to be ICNIRP compliant. Again, although it is acknowledged that the proposed equipment will be sited marginally closer to the edge of the building, this is a requirement in order for ICNIRP guidelines to be met and there is no opportunity to set back the proposed equipment further, and further to this, the proposed equipment is still 2.75m from the edge of the building, reducing visibility of the proposal from the surrounding area as far as possible, with the lowest possible height installation.
- 3.22 The existing antennas are supported by pole mounts, mounted on the edge of the plant room further towards the centre of the rooftop. Whilst it is acknowledged that the new proposed antennas and supports will be larger and sit slightly higher than the existing, as outlined above the siting is wholly appropriate, avoiding the requirement for larger scale supporting structures, and all equipment has been reduced in size and scale as far as technically possible.
- 3.23 In the same regard as the antennas, the position of dishes is informed by physical constraints of the site and the surrounding area, and the outcome of software modelling. The dishes must connect to other base-stations in the wider network by microwave link. As such, they require 'line of sight' which an unobstructed path to neighbouring base-stations. In this instance, 2No. 300mm dishes are proposed to be sited beneath the proposed antennas, on the same support poles, at the eastern edge of the rooftop. The size and number of dishes has been kept to the minimum required for operational efficiency and the associated impact of this addition on the surroundings would be minimal.
- 3.24 Radio signals are generated within radio equipment housing cabinets and in this case, 1No. equipment cabinets would be required to improve the network. The proposed antennas must connect to the proposed equipment

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housing cabinets by electrical cable feeders. The equipment cabinets form an essential component of the base-station and must be located as close to the antennas as possible in order to minimise electrical power losses during operation. It is proposed to install the cabinets at rooftop level on a cabinet support frame, situated on the eastern end of the rooftop, adjacent to the siting of the antennas and dishes.

- 3.25 The amendments to the proposal are a requirement in order for the installation to be ICNIRP compliant. 5G is a more complex technology than previous generations, this means that ICNIRP issues are more restrictive. Safety guidelines are not something the Appellant can compromise on, and as such there is no opportunity to reduce the height/scale of the proposed equipment, or to move the equipment further away from the edge of the building.
- 3.26 There is very limited scope to alter the design in order to meet the technical requirements, nonetheless it is considered the proposal now put forward is appropriate to the site and its surroundings and avoids any unacceptable level of impact. The proposed changes to the previously approved scheme are minimal, and as above, required for safety guidelines to be met.
- 3.27 Due consideration has been given to the process and this proposal put forward is the best available option – it both achieves the technical requirements and does not bring unacceptable harm to the character of the area. The guidance given by the Government on the balance Local Authorities must take between these two factors – technical achievements of telecommunications developments and visual harm – will be clarified in section 5 of this document under ‘Policy’.

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Health and Safety - including ICNIRP compliance

3.28 The Application Site complies with the International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines. A declaration of compliance is included with this Application.

3.29 5G is a more complex technology than previous generations, this means that ICNIRP issues are more restrictive. Paragraph 44 of the Code of Practice for Wireless Development in England (2022) states:

'Health and safety: many older buildings are not capable of taking extra weight from wireless infrastructure. These structural limitations may affect potential sites and should be considered as part of the selection process. Building-based masts require ancillary equipment, such as handrails and rooftop grillage, to ensure access and safety compliance. All rooftop installations will be subject to ICNIRP guidelines, which may restrict siting locations on the rooftop. Antennas (particularly 5G antennas which operate at higher frequencies) need to be elevated higher off building rooftops to ensure that exclusion zones can be maintained, particularly when the rooftop is accessible to the public (see Annex C). Where these types of considerations arise, it is vital that operators and local planning authorities discuss and agree solutions to any matters that could restrict siting options.'

3.30 A rooftop Deployment Constraints and Solutions Document is submitted with this application, which outlines examples of ICNIRP compliant design options. In this case, the proposed antennas are sited towards the edge of the rooftop. This design solution typically means that there is reduced necessity for antennas to be sited higher, meaning support structures are minimised. This can demonstrate a less visually intrusive design than a more centrally located scheme, which will likely require larger scale supports.

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4. Technical Justification

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


- 4.1 This critical digital infrastructure will provide improved capacity for 3G and 4G, and also new cutting-edge 5G coverage for VMO2 to the surrounding area. The height of the antennas is required to ensure the safe and effective operation of the site.
- 4.2 The provision of poor communication services has well recognised economic and social impacts on communities and businesses. Importantly, the base-station would provide increased network capacity, allowing quality service provision to a higher number of people at the same time. Improving cellular connectivity is led largely by demand. The very high level of mobile phone use in the UK requires the installation of additional base stations to provide the necessary connections.
- 4.3 Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV and downloads. The base stations are connected to each other and by cables or wireless technology to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. There are several variables that determine the size and shape of each cell.
- 4.4 Because base stations are low powered radio transmitters, they each have a limited range, meaning that they generally need to be located close to the area requiring coverage. If one moves too far away from that area, then it is likely that some areas will remain with limited services.
- 4.5 The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.
- 4.6 The insufficient coverage of this major network at a time when reliance on connectivity services is a fundamental part of every day is simply unacceptable.

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- 4.7 As introduced above in Section 3 of this document, the objective of this site is to ensure that 3G, 4G and 5G coverage in the area for VMO2 has sufficient coverage capacity.
- 4.8 The upgrade of this site will enable 3G and 4G. 2G was the second generation of cell phone transmission, it introduced data services for mobile, starting with SMS text messages. 3G was an extension to this and enabled the use of data. The main technological difference that distinguishes it from 2G technology is the use of packet switching rather than circuit switching for data transmission. Increased data rate to a minimum of 2 Mbit/s for stationary or walking users, and 384 Kbit/s in a moving vehicle.
- 4.9 Similarly, 4G was another extension and enabled an increased speed in connection. It Supports a minimum data rate of 1 Gbit/s for stationary and 100 Mbit/s for mobile operation. In simple terms the benefit to users is that 4G that supports mixed data, voice, video and messaging traffic at significantly faster speeds than 3G. This results in ultra-fast internet browsing, video streaming, gaming, e-mail and downloads. In simple terms 3G allows for data transmission as well as text services as mobile phones, computers and other portable electronic devices access the internet wirelessly.
- 4.10 The base-station upgrade would also provide new 5G services, introducing ultra-fast mobile connectivity capable of operating the 'Internet of Things'. This upgraded and replacement infrastructure will provide higher mobile down-load speeds and more reliable, quicker phone connections.
- 4.11 Importantly, the upgraded base-station would provide increased network capacity, allowing quality service provision to a higher number of people at the same time. Improving cellular connectivity is led largely by demand. The very high level of mobile phone use in the UK requires the installation of additional/upgraded base stations to provide the necessary connections.
- 4.12 Due to the busy nature of this part of Bloomsbury and the increase in mobile phone uptake, the existing installations cannot meet the current capacity demand.

Government Aspirations and Public Benefits

- 4.13 High-quality communications infrastructure is essential for sustainable economic growth and that high-speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.

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- 4.14 Ofcom's 2018 Communications Market Research Report ² shows that smartphones are owned by four of every five UK consumers. While take-up of fixed broadband has plateaued at 80%, accessing the internet on a mobile phone continues to grow, from 66% in 2017 to 72% in 2018. Demand for data continues to grow rapidly for UK consumers, with 1.9GB consumed by an average mobile subscription per month in 2017, (up from 1.3 GB the previous year). The report found that more than seven in ten now use their mobile to access the internet.
- 4.15 More than any previous generation of mobile networks, 5G has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time. 5G will have the ability to handle demand, offering faster download and upload speeds and enabling more devices to simultaneously access the mobile internet³. This proposal would provide higher mobile down-load speeds and more reliable, quicker mobile phone connections.
- 4.16 The UK Government recognise the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. Paragraph 118 of the NPPF (2023) states that *"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) ..."*.
- 4.17 The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal, to enable VMO2 to provide improved network services and capacity to the surrounding area, will assist in achieving these objectives within this area.
- 4.18 The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the upgrading of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

² https://www.ofcom.org.uk/_data/assets/pdf_file/0022/117256/CMR-2018-narrative-report.pdf


³ Mobile UK: <https://www.mobileuk.org/5g-benefits>

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4.19 This support for the improvement to the mobile communications network including 5G services was also set out in “Collaborating for Digital Connectivity” of March 2019⁴. The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion. Ministers stated: ‘...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’.

4.20 The latest amendment to Part 16 of Schedule 2 to the General Permitted Development Order (England) came into force in 2016, increasing the permitted development rights for installation of communications apparatus, demonstrating the importance that the Government attributes to delivering critical mobile digital infrastructure. In April 2021, the Government launched a consultation entitled ‘Changes to permitted development rights for electronic communications infrastructure: technical consultation’⁵ which looks at how to implement the proposals that were consulted on in August 2019, demonstrating sustained commitment for Government to enable the smooth rollout of the latest digital technology. The Minister for Digital Infrastructure, Matt Warman MP, outlines in this consultation:

‘Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data in the United Kingdom is increasing rapidly, and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality mobile connectivity.’

It is welcome that all four Mobile Network Operators have started to deploy 5G networks, meaning 5G is now available in over 200 towns and cities across the United Kingdom. We must, however, continue to ensure people have access to fast, reliable digital connectivity and mobile coverage. The planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliant on mobile connectivity.’

⁴ Collaborating for Digital Connectivity 2019: <http://democracy.epsom-ewell.gov.uk/documents/s17211/Telecommunications%20Equipment%20Wells%20Road%20Appendix%200>

⁵ Permitted Development rights - Open Consultation April 2021: <https://www.gov.uk/government/consultations/changes-to-permitted-development-rights-for-electronic-communications-infrastructure-technical-consultation/changes-to-permitted-development-rights-for-electronic-communications-infrastructure-technical-consultation>

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4.21 These proposals to build on the expanded permitted development rights for communications infrastructure, further demonstrate this significance of critical mobile digital infrastructure to the public interest and highlights the importance of delivering 5G services in particular, and furthermore the importance of digital connectivity to the economic and social objectives of government.

4.22 This consultation is relevant to the application, as not only does it highlight the crucial need for the proposal but also, the Government's continued support and commitment to improving digital connectivity in England. Enhancing the mobile networks is of vital national importance in the short term, and it is significant that telecoms has been designated as "critical work" during this time, but it is anticipated that the current shift towards homeworking and online services will persist, to a lesser degree, in the future. It is vital that this critical infrastructure is in place throughout the UK to meet this demand.

4.23 Mobile connectivity is becoming ubiquitous, and the expectation is that it should be available throughout the country. Ofcom's Connected Nations 2020 UK report⁶ explains the important role of Mobile Networks Operators (MNO's) such as VMO2:

"We expect MNOs to leverage other benefits of 5G as they continue to rollout their networks and to provide connectivity solutions for both consumers and businesses. This includes private networks for businesses, which will facilitate greater control and privacy in addition to connectivity. (emphasis added)

5G will continue to target a range of other applications (e.g. manufacturing, logistics, agriculture, automotive, energy, media & entertainment and healthcare sectors) to deliver benefits to consumers, businesses and organisations. 5G (3GPP Release 16 & 17) has features such as near instantaneous network response (a latency of only a few milliseconds) and high reliability which are key enablers for these applications..."

4.24 The benefit of having a strong and resilient network has been highlighted over the past year, following the sudden shift in the network requirements due to the COVID-19 pandemic. The Government Minister of Digital

⁶ https://www.ofcom.org.uk/data/assets/pdf_file/0024/209373/connected-nations-2020.pdf

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Infrastructure, Matt Warman, stated during a Keynote speech, at a Connected Britain Event in September 2020⁷:

*"The world is in the middle of a digital revolution. **COVID has accelerated this process, digitising almost every part of our everyday lives and making the infrastructure that connects us more important than ever.** That's why it is at the top of the government's agenda..."*

We are taking forward legislative reforms to make it easier for you to deploy broadband in blocks of flats and to deploy or upgrade mobile phone masts." (emphasis added)

- 4.25 More recently, as part of the Levelling Up White Paper⁸ released by the government in February 2022, one of the 12 'missions' of the paper, highlighting the importance of providing high quality communications infrastructure, states "By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for most of the population.", allowing for strong business performance, growth and jobs in new sectors and raised living standards:

"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..."

*More broadly, **high quality digital infrastructure can deepen local labour markets through remote working**, making it more attractive for both workers and companies to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive growth and jobs in new areas.*

***The sector also provides opportunities for raising living standards** – median earnings for the sector are 50% higher than the UK average."*

⁷ Connected Britain 2020: <https://www.gov.uk/government/speeches/matt-warmans-keynote-speech-at-connected-britain-2020>

⁸

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1052708/Levelling_up_the_UK_white_paper.pdf

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- 4.26 Ofcom's Discussion Paper: Meeting future demand for mobile data (2022)⁹ sets out the growth in recent years, and anticipated growth in demand on mobile services provided by public mobile networks. This will only increase as technology evolves:

"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 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." (emphasis added)

- 4.27 Ofcom's future approach to mobile markets and spectrum Conclusions paper (2022)¹⁰ echoes the above, noting that demand has increased and will continue to do so as new services and technologies evolve:

"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."

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

- 4.28 The recognised public benefits of 5G are not just localised. PricewaterhouseCoopers (PwC) recently published an analytical forecast and review of the global economic impact of 5G¹¹. This report outlines:

⁹ Ofcom's Discussion Paper: Meeting future demand for mobile data (2022):

https://www.ofcom.org.uk/_data/assets/pdf_file/0017/232082/mobile-spectrum-demand-discussion-paper.pdf

¹⁰ Ofcom's future approach to mobile markets and spectrum Conclusions paper (2022):

https://www.ofcom.org.uk/_data/assets/pdf_file/0036/248769/conclusions-mobile-spectrum-demand-and-markets.pdf

¹¹ PwC - The global economic impact of 5G: <https://www.pwc.com/gx/en/tmt/5g/global-economic-impact-5g.pdf>

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'For policy-makers and governments, the key is to regard 5G as fundamental societal infrastructure: a platform that, by providing ubiquitous, superfast broadband, will influence the competitiveness of nations' economies and their ability to develop their own sunrise industries and technologies. Policy-makers should look to encourage and provide incentives for 5G investments as quickly as possible.'

4.29 On a wider scale, the proposal would contribute towards the country's connectivity and digital economy future. Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion, and, on a local scale, it is important to ensure the improvement of telecommunications networks in this area.

4.30 In April 2023 a new policy framework, 'UK Wireless infrastructure Strategy'¹², to drive deployment and adoption of 5G and advanced wireless connectivity was published by the Department for Science, Innovation and Technology (DSIT). Within the foreword for this strategy, Michelle Donelan, the Secretary of State for DSIT states:

"Connectivity has brought benefits for British households and British business, boosting growth, productivity, and opportunity for all. And change shows no sign of stopping. In fact, we find ourselves on the brink of a new revolution which promises to transform the world once more."

"5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone 5G will drive growth in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. 5G can improve our public services, too, in everything from 4 education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis."

"This is an incredible opportunity; widespread adoption of 5G could see £159bn in productivity benefits by 2035. And it is exactly the kind of

¹² UK Wireless Infrastructure Strategy:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1149659/uk_wireless_infrastructure_strategy.pdf

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opportunity which the Department for Science, Innovation and Technology was created to seize. It is my personal mission as the Department's first Secretary of State to put Britain right at the forefront of scientific and technological progress. By bringing together world-class research and a dynamic business ecosystem, **we can harness enterprise and innovation to grow the economy, driving forward the delivery of one of the Prime Minister's five priorities.**" (emphasis added)

4.31 Julia Lopez, the Minister of State for Digital Infrastructure adds:

"This is why delivering world-class digital infrastructure to all Britons is a fundamental mission of this government - and our efforts to build it the modern equivalent in scale and ambition to the Victorians' construction of the railways. **Our plan is for every corner of our country to get lightning fast connectivity, not only to give people real choices about where to live and work today but so they will not be left out of future technological revolutions because of poor infrastructure.**" (emphasis added)

4.32 Again, the UK Government recognise the benefits of 5G, and how successful deployment of this infrastructure will continue to expand and transform the economy, from major cities to rural settings:

"By transforming our economy, **widespread adoption of 5G can bring a cumulative productivity benefit of £159bn by 2035, driving growth and inward investment, and improving lives for communities in every corner of the country.** By ensuring that everyone can access the technology they need, including through specific support for rural economies by enabling applications such as agritech, **we can make it as easy to start and scale up a digital business in rural Yorkshire as it is in central London.**"

"Given the substantial potential that 5G offers for businesses and public service delivery, we are setting out a bold vision for the next generation of our national networks to galvanise investment across our economy. **We want to move beyond the basic 5G that is being deployed now over 4G networks to build higher quality, standalone 5G networks that do not rely on older infrastructure.** We also want **to extend 5G coverage well beyond cities and towns to all populated areas of the UK, including rural villages and communities.** We are therefore setting a new headline ambition for the UK to have nationwide coverage of standalone 5G to all populated areas by 2030. This ambition is rightly stretching and we will work with the industry to achieve it. This strategy sets out the policy framework we will implement to do that - removing barriers to investment and stimulating demand -

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recognising the need for ongoing dialogue with key stakeholders.”
(emphasis added)

- 4.33 Looking into the future, the paper sets out the DSIT's ambition for 2030, having standalone 5G coverage to all areas of the UK:

*“Although it is impossible accurately to predict when large scale demand for 5G and other forms of advanced wireless connectivity will emerge and how widespread that will be, **mobile data provided over public mobile networks has grown 40% per year on average over the last decade and we expect to see continued growth in data traffic over the next decade.***

*Ofcom's Mobile Market Review suggests **data growth could range from a 25% increase per year to 2030 to 55% increase per year to 2030.** Research we commissioned shows that there will be an increase in demand for wireless data but notes that this would be less steep if a greater share of this traffic is carried over fixed networks.”*

***“We want high quality coverage to extend well beyond cities and larger towns to all populated areas of the UK, including villages and rural communities.** We are therefore setting a stretching new ambition of nationwide coverage of standalone 5G to all populated areas of the UK by 2030.”* (emphasis added)

Practical Applications of 5G Connectivity as Example of Material Soci-Economic Benefit: -

Education

- 4.34 The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.
- 4.35 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

Health

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- 4.36 Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.
- 4.37 5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.
- 4.38 Further details regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the local planning authority in understanding any technical constraints associated with the proposed development. Further details of the benefits associated with mobile connectivity and 5G services can be found within the enclosed document titled 'Digital Public Benefit Brochure'.

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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)

5.1 In accordance with planning policy, a sequential approach to site selection was adopted. The applicant's network rollout team investigated the following siting and design options using this sequential approach to site selection:

- Upgrading their own existing base stations;
- Using existing telecommunications structures belonging to another communications operator. i.e. Mast and/ or site sharing, co-location;
- Installations on existing high buildings or structures including National Grid pylons;
- Using small scale equipment; and finally
- Erecting a new ground-based mast site – (1st) Camouflaging or disguising equipment. (2nd) A conventional installation e.g. a lattice mast and compound.

5.2 The opportunity to upgrade an existing site was given preference over installation of an additional base station. The need to enhance the network means that coverage could be improved by upgrading apparatus at an existing communications site, in line with the NPPF and Code of Practice for Wireless Network Development in England (2022).

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
N/A	N/A	N/A	N/A


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

5.3 The application site is an operational base-station, providing mobile communication services to customers in the surrounding area that are on the VMO2 network. The National Planning Policy Framework stipulates that:

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*'The number of radio and electronic communications masts, and the sites for such installations, **should be kept to a minimum consistent with the needs of consumers**, the efficient operation of the network and providing reasonable capacity for future expansion. **Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged.**' (para. 119) (emphasis added)*

- 5.4 The Operators would provide new communications capability through an existing, building-based telecommunications site. New capability would be provided without establishing neither an additional site, nor a new ground-based mast. The proposal therefore adheres to para. 119 of the NPPF. Furthermore, the principle of the application site being used to host communications apparatus has already been established by virtue of the extant permissions for the operational base-stations, for a number of operators.
- 5.5 The alternative to the proposed siting arrangement would be to establish a new and additional base-station in the local area. This may comprise VMO2 maintaining provision of their existing services from the existing site at International House. Such a proposal would result in multiple telecommunication installations across multiple sites and would be contrary to the NPPF, para. 119.

Land use planning designations:

- 5.6 The application site does not fall within any environmental designations and is not ecologically sensitive. There is no evidence of any protected species or their habitats in this location. Furthermore, a check of the Environment Agency website has confirmed the site is not within a Flood Zone area.

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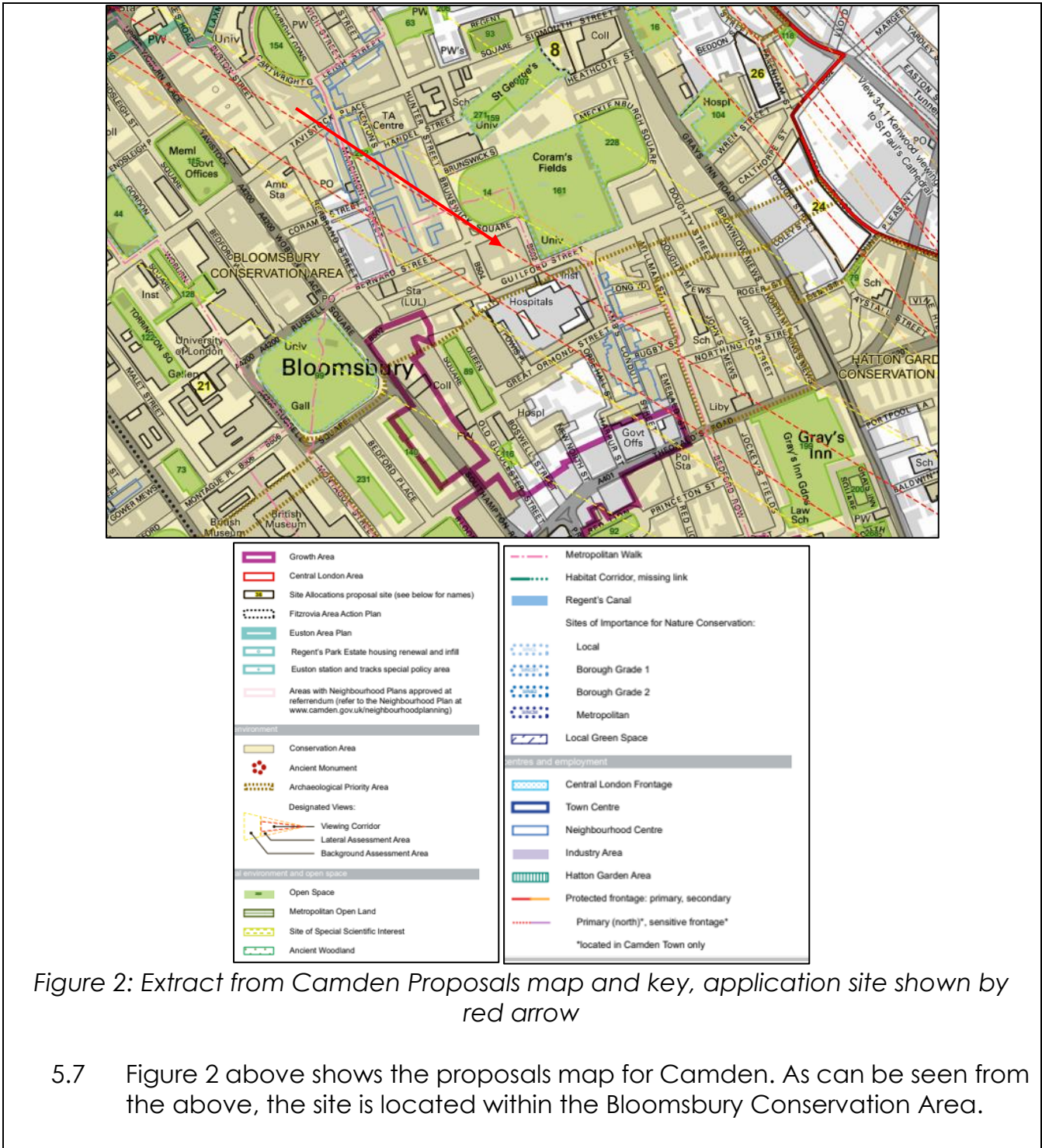
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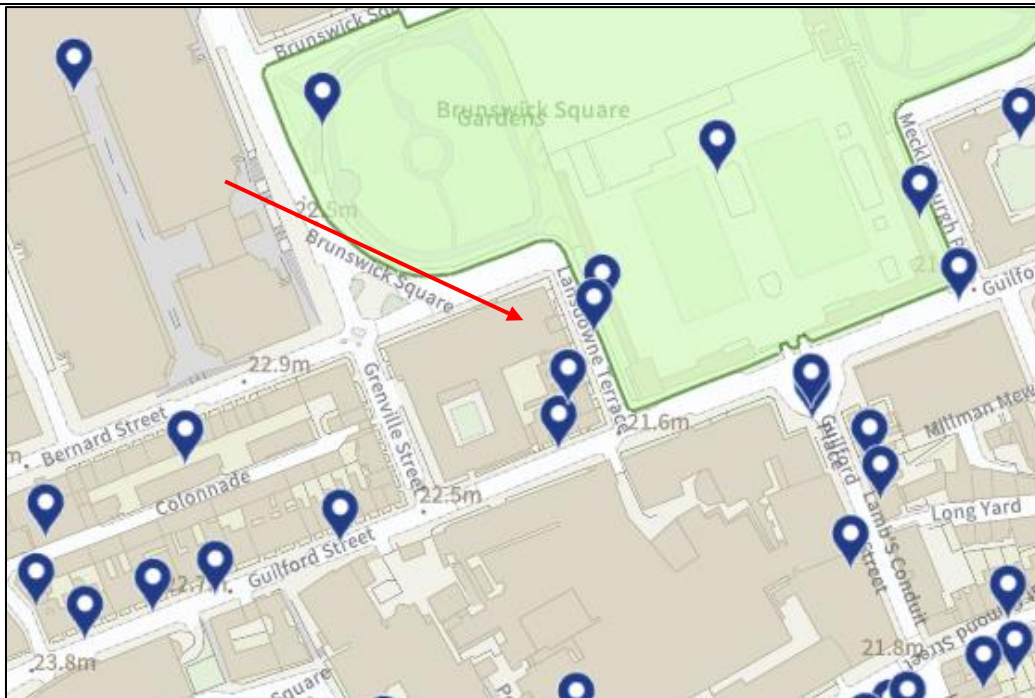


Figure 3: Map showing application site and listed buildings, application site shown by red arrow, listed parks and gardens shown by green area and listed buildings shown by blue markers (Source: Historic England)

Heritage Impact Assessment


5.8 As shown in Figure 2 above, the site is located within Bloomsbury Conservation Area. The site itself is located in the centre of the conservation area, with the area to the south of the site, including hospitals, not part of the designation. The host building itself is not listed, and as can be seen in Figure 3 above, the nearest listed building is Grade II Listed 'Numbers 1-4 and Attached Railings, 1-4, Lansdowne Terrace', located approximately 40m to the south. Grade II Listed 'Number 89 To 92 And Attached Railings, 89-92, Guilford Street' is located approximately 55m to the south of the site. Directly opposite the site to the north and east is Grade II Listed Registered Park and Garden 'Coram's Fields, With Mecklenburgh And Brunswick Squares', within which are several Grade II Listed railings and gates.

5.9 Paragraph 200 of the National Planning Policy Framework (NPPF) places an onus on those whose proposals may affect historic assets to include a clear description of the significance of the assets affected. It is noted that the requirement in the NPPF is that '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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5.10 The Bloomsbury Conservation Area Appraisal and Management Strategy was adopted in 2011, and outlines the key features of the conservation area. The host building is located within sub area 12, Coram's Fields/Brunswick Centre, a map of which is shown in Figure 4 below. As can be seen, the building is noted as being a positive building within the conservation area, but is not listed.

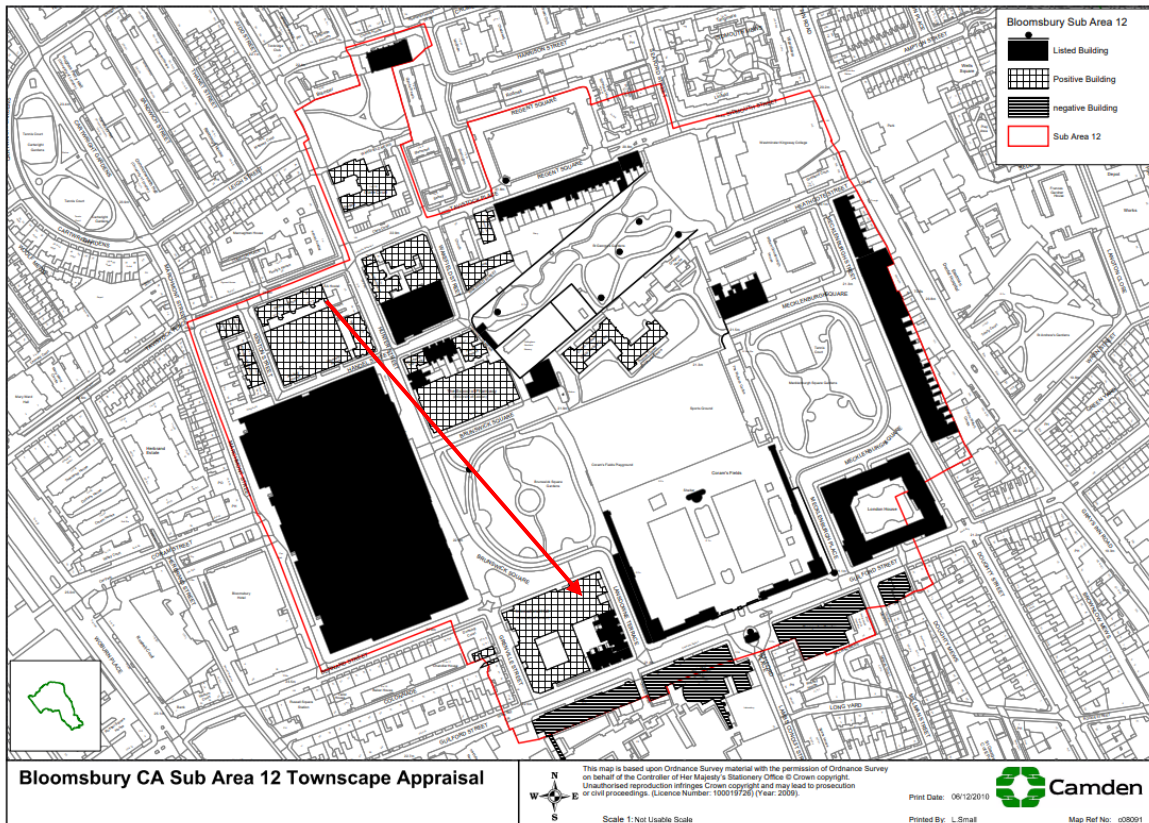


Figure 4: Map of Sub area 12, Coram's Fields/Brunswick Centre, application site shown by red arrow


5.11 Regarding this sub area, the conservation area appraisal and management strategy states, 'This sub area is dominated by large-scale, green open spaces of historic significance in and around Coram's Fields. The spaces act as a green lung, providing a sense of openness which contrasts with surrounding areas. There is a predominance of institutional (hospital, university, education), recreational and community uses with secondary residential and office uses. The area is relatively busy during the daytime as a result of these uses.'

5.12 The appraisal also states, 'Regardless of architectural style or period, there are similarities in the strong parapet lines, use of banding to articulate storey

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heights, long, continuous frontages of development, a relatively consistent and close relationship to the street and generally rectilinear form of blocks. The prevailing height of development is four storeys, with taller elements up to seven storeys.'

5.13 It is noted there is a predominance of institutional uses within the area, of which the application site could be classified. The host building is a 7 storey building, as noted, one of the taller elements within this sub area. The host building is not specifically mentioned in terms of features within the appraisal, but is noted as a positive building within this sub area. The surrounding green space is described as a green lung with a sense of openness. Given the rooftop nature of the proposal, and the fact that the principle of telecommunications development is well established at this site, it is not considered that the application proposal will have an impact on this described openness.

5.14 The proposed upgraded equipment will be visible from a number of surrounding roads. Due to the nature of this being a taller building in the area, some closer views may be obscured by the building itself. Figure 4 below shows the view towards the host building from Brunswick Square facing south. As can be seen, given the scale of the building, none of the existing telecommunications equipment is visible from this angle, and the proposed upgraded equipment is not likely to be visible from this viewpoint.




Figure 5: View of the application site from Brunswick Square facing south, approximate location of proposed installation shown by red arrow (Source: Google Maps)

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5.15 Figure 6 below shows a slightly wider angled view towards the application site, from Brunswick square facing south east. Some of the existing rooftop equipment is visible from this viewpoint, but given its minimal protrusion from the rooftop in relation to other rooftop features such as the plant room, this equipment does not appear out of place or incongruous. The proposed upgrade equipment will be sited on the eastern end of the rooftop. From this viewpoint, this area is entirely screened by the dense tree cover which surrounds the adjacent Brunswick Square Gardens. Again, as such, there will be no visual change from this viewpoint, and no impact on the conservation area and its setting, nor on any of the nearby listed buildings or their settings.



Figure 6: View of the application site from Brunswick Square facing south east, approximate location of proposed installation shown by red arrow (Source: Google Maps)

5.16 Figure 7 below shows the view towards the application site from the corner of Lansdowne Terrace and Brunswick Square, facing south west. Grade II Listed Numbers 1-4 and Attached Railings, 1-4, Lansdowne Terrace can be seen to the rear of the application building from this viewpoint. Whilst it is acknowledged that the proposed upgrade equipment will be partially visible from this viewpoint, owing to its siting being slightly set back from the edge of the rooftop, whilst ensuring that the proposed equipment is of the lowest height and smallest scale possible, it is not considered the equipment will appear dominant or detract from the setting of the conservation area, nor will it have a negative impact on the listed buildings or their setting. This is an existing site which hosts a number of operators equipment, and the proposed upgrade will only very marginally exceed the height of the existing equipment, by approximately 1.3m. In the context of the height of the building itself, this will appear minimal, and again will not lead to any

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significant detrimental impact on the setting of the conservation area within which the site is located, or on the nearby listed buildings or their setting. The slight set back of the equipment cabinet means they will not be readily viewable from ground level.



Figure 7: View of the application site from corner of Lansdowne Terrace and Brunswick Square facing south west, approximate location of proposed installation shown by red arrow, listed buildings shown by purple arrow (Source: Google Maps)


5.17 It is acknowledged that the siting of the equipment towards the edge of the building is likely to make it more visible from certain viewpoints in the surrounding conservation area than the existing equipment. However, it should be noted at this stage that a further set back design would likely require much a larger supporting structure in order for the base station to operate efficiently and safely, which in itself is likely to be more visually intrusive than what is proposed here. It is considered that the proposal put forward represents the most appropriate design, which balances the technical restraints and visual impact, whilst bringing forward vast public benefit.

5.18 The building itself is well established and tall, and as such asserts dominance over the surrounding area, and already hosts several operators telecommunications equipment. The upgrade of rooftop telecommunications equipment in this instance is therefore not considered to have any significant visual impact, particularly when viewed in the context of the building itself. There is existing rooftop telecommunications equipment on the host building, which do set a precedent that telecommunications base equipment sited here is not out of place and is acceptable.

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- 5.19 Although it is acknowledged that there will be some visibility of the upgraded equipment, given the equipment will only be marginally taller than the existing equipment, it is not considered that the proposal will appear out of place or incongruous in the local area.
- 5.20 As previously mentioned, the proposal consists of a minor amendment to a previously approved scheme. The amendments to the proposal are a requirement in order for the installation to be ICNIRP compliant. 5G is a more complex technology than previous generations, this means that ICNIRP issues are more restrictive. Safety guidelines are not something the Appellant can compromise on, and as such there is no opportunity to reduce the height/scale of the proposed equipment, or to move the equipment further away from the edge of the building. The proposed changes to the previously approved scheme are minimal, and as above, required for safety guidelines to be met. There is very limited scope to alter the design in order to meet the technical requirements, nonetheless it is considered the proposal now put forward is appropriate to the site and its surroundings and avoids any unacceptable level of impact.
- 5.21 Paragraph 206 of the NPPF states that, *'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'*.
- 5.22 The proposed development consists of the removal of 2no antennas to be replaced with 4no new antennas, the addition of 2no 300mm dishes, 1no cabinet and ancillary works thereto. The equipment has been reduced in size and scale as far technically possible, and the orientation of the equipment towards the edge of the rooftop means the supporting structure is minimised, lessening any potential visual impact. It should also be noted that given the neighbouring sites, the principle of telecommunications development is well established within the locality.
- 5.23 The proposal will not result in the loss of any heritage asset. It is not considered that the proposal will have a substantial impact upon the conservation area in which it is situated. The building itself, while noted as positive in the conservation area appraisal, is larger and assets more dominance that much of the development in this part of the conservation area. Further to this, as identified above, views of the application site itself are relatively limited to some viewpoints within the conservation area, many of which are obscured due to trees or the height of the building itself.

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- 5.24 Given the fact that wider views are not easily achievable, that this is an upgrade to an existing site and that all equipment has been reduced in size and scale as far as possible, it is not considered that the proposed works will have any detrimental impact on the surrounding conservation area.
- 5.25 Any harm to the surrounding Conservation Area or other local heritage asset that might arise as a result of the development subject to this application is clearly less than substantial. Regarding 'harm', paragraph 208 notes that, *'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset that harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'*.
- 5.26 The reasoning behind the placement and design of the proposed development is set out within previous sections of this document, detailing why the proposed equipment should take the proposed form and be located in the selected position. This provides the reasoned justification for the 'harm' caused. Previous sections of this document also set out the need to upgrade the existing equipment and the 'public benefits' that will flow from this necessary process.
- 5.27 The limited harm identified is outweighed by the significant public benefits of the proposal and it follows that significant weight should be given to the need to allow the Applicant to upgrade this communications site in view of the wider socio-economic and sustainable development benefits of ensuring high quality, reliable, mobile communications and connectivity services are in place.
- 5.28 The NPPF is clear that that harm should be weighed against the public benefits of the proposal. The Planning Inspectorate has in recent years continually recognised the importance of connectivity. When applying the balancing exercise encouraged at paragraph 208 of the NPPF the Inspectorate has found in multiple cases that the provision, or prevention of loss to existing services can outweigh less than substantial harm to heritage assets.
- 5.29 In October 2020, the decision of the Council of the London Borough of Islington to refuse planning permission for the installation of 6no antennas and 2no. 0.3 metre dishes on to the rooftop of 74-76 St John Street, was overturned by the Planning Inspectorate (Cornerstone, Telefonica and Vodafone against decision of the Council of the London Borough of Islington, appeal reference APP/V5570/W/20/3246770). The appeal site was within the Clerkenwell Green Conservation Area (CGSA) and immediately

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adjacent to, and visible from, the Charterhouse Square Conservation Area (CSCA). In allowing this appeal, the Inspector offered the following comments in their Appeal Decision:

"I am mindful of the statutory duties that require special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas and of preserving or enhancing listed buildings, their settings or any special architectural or historic interest which they possess. I am also conscious that the Framework indicates that, when considering the impact of a proposal upon the significance of designated heritage assets, great weight should be given to the assets' conservation. This is irrespective of whether any identified harm to its significance is at a substantial or less than substantial level.

Nevertheless, I am content that the minor level of less than substantial harm that I have identified to multiple designated heritage assets, even when considered in a cumulative sense, would be outweighed by the significant public benefits that would be achieved by the proposal.

*I have found that **the proposal would fail to preserve the character or appearance of the CGCA and would cause a minor level of less than substantial harm to the heritage significance of the CGCA and various other designated assets through development within their settings.** I have also identified associated policy conflicts. Indeed, the proposal conflicts with the development plan when read as a whole (emphasis added). **However, I have also found that the proposal would deliver significant public benefits through improved digital communications networks. These benefits would outweigh the heritage harms that I have identified.** Thus, material considerations indicate that, in this instance, the proposal should be determined other than in accordance with the development plan (emphasis added).*


***The limited harm identified to the surrounding Conservation Area, is outweighed by the significant public benefits of the proposal** and it follows that significant weight should be given to the need to allow the Applicant develop this communications site in view of the wider socio-economic and sustainable development benefits of ensuring high quality, reliable, mobile communications and connectivity services are in place."*

5.30 The application site too is located on the rooftop of a tall building within a conservation area, and will bring forward the same benefits the appeal development case would, and as such these arguments apply in this case, with less than substantial harm being outweighed by vast public benefit.

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5.31 Another recent example appeal decision by the Planning Inspectorate APP/L5810/W/21/3271236 / APP/L5810/W/21/3271236 Mobile Broadband Network Ltd against decision of the Council of the London Borough of Richmond-upon-Thames relates to an upgrade of existing equipment on a rooftop on a Grade II Listed building within a conservation area. The upgrade included the installation of 6No. antenna apertures, internal equipment upgrade and ancillary development thereto.

5.32 Again, the Inspectorate found that in this case the public benefits of the proposal outweighed the harm to the heritage asset, and as supported by paragraphs 118 & 119 (formerly 114 & 115) of the NPPF highlights the encouragement of utilising existing installations, as is the case with the application proposal:

*“As demonstrated above, the number of locations from where the apparatus would be immediately visible is limited, and furthermore **the appeal building is tall and views of the proposed apparatus would be relatively distant, requiring a distinct upward looking motion.***

*Nonetheless, the proposed apparatus would be slightly taller and bulkier than that which currently exists and extra fencing is proposed. This would detract somewhat from the architectural integrity and clean Art Deco design of the appeal building thereby causing limited harm to its significance, and paragraph 199 of the National Planning Policy Framework (the Framework) makes clear that great weight should be given to the conservation of a heritage asset. **The harm that I have identified would however be less than substantial as described in paragraph 202 of the Framework.**”*

*“The Framework at paragraph 114 makes clear that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Paragraph 115 of the same document indicates that, whilst the number of communication masts and the sites for such installations should be kept to a minimum, **the use of existing masts and buildings should be encouraged.** This would, to an extent, be the case here. **Accordingly, I afford substantial weight to the public benefits of the proposal.**”*

5.33 Similarly, the application building is a tall building in a conservation area within London, which hosts established electronic communications equipment, and would provide similar public benefits. In this case however, the building itself is not listed. As such, in a similar manner to the above

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appeal, the less than substantial harm identified will be outweighed by the public benefits provided.

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

Siting and Appearance:

- 5.34 This section should be read in conjunction with the preceding sections of this statement where a description of the application site, technical details and justification for the design and details of the public benefits of the proposal are provided.
- 5.35 The applicant gives due regard in designing all new sites to limit the visual impact through good design. In this instance the proposed installation is subject to technical and build constraints. That notwithstanding, it is submitted that the appropriate siting and design put forth will mitigate any potential impact on the site and its surroundings to acceptable level. It is considered that the proposal offers the least visually intrusive site and design available to the applicant which also ensures suitable new and enhanced mobile coverage can be provided to the wider area.
- 5.36 It should be recognised that the presence of communications equipment is an established feature at this site and in this area and that the upgrade proposes to replace existing apparatus with upgraded equipment, that has been designed and sited to reduce visually impact as far as technically possible. The upgraded equipment will allow for the technologies to operate safely and efficiently, and the antennas must be sited as proposed in order to meet the operational requirements of the proposed upgrade.
- 5.37 It is considered that the proposal utilises the most suitable design available to meet coverage demands. It is important to keep the impact of telecommunications development in the area to a minimum. The Code of Best Practice on Mobile Network Development in England emphasises that “existing masts, buildings or other structures should be used unless the need for a new site has been justified”, encouraging the use of existing masts to improve connectivity where possible, such as in this case. In this case, the technical requirement can be met through utilising an existing site which supports telecommunications equipment. It is therefore considered that the siting of the proposal is wholly appropriate as it prevents the need to deploy a new telecommunications site elsewhere in the area. The alternative of proposing an additional installation in the area to provide the enhanced coverage would have a greater overall impact.

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5.38 The proposal has been designed specifically to achieve a balance between meeting the technical requirement of the operators and avoiding harm to the site or the surrounding area. Whilst the replacement antennas will be slightly larger than the existing ones, and will be sited at a vantage point at the edge of the rooftop, this is the smallest scale equipment possible to achieve the technical requirements, and is considered the most appropriate siting option possible for the installation to operate safely.

5.39 As outlined in previous sections, the equipment will be visible from some vantage points along Brunswick Square and Lansdowne Terrace, but given this is an existing, established installation and the proposed upgraded equipment is minimised in size and scale as far as technically possible, visual impact is minimised as far as possible, and the siting is considered wholly appropriate.

Planning Policy

Development Plan

5.40 Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.41 For the purposes of Section 70, the current adopted development plan for the London borough of Camden Council, relevant to the proposal, comprises of Camden Local Plan (adopted July 2017) and The London Plan: Spatial Development Strategy for Greater London (adopted 2021).

The London Plan 2021

5.42 A new London Plan was adopted in March 2021. In a similar fashion to the previous London Plan (2016), the new London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In 'Policy SI 6: Digital Connectivity Infrastructure' the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to ensure its global competitiveness, now and in the future.

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- 5.43 It is considered that the Operators' networks are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. The written justification for Policy SI 6 states the following:

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

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 (emphasis added).

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

- 5.44 Policy SI 6, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing VMO2 to provide continued and enhanced coverage to the surrounding area. The proposed development meets the aims of the London Plan (2021) and the long-term strategies which the Mayor aims to achieve through this guidance.
- 5.45 This proposal seeks, individually, to provide high speed internet connectivity throughout London.

Camden Local Plan (Adopted July 2017)

- 5.46 There are no policies relating directly to telecommunications development within the Camden Local Plan (2017). General policies of relevance include D1 (Design), Policy A1 (Managing Impact of Development) and D2 (Heritage).
- 5.47 Policy D1 – Design sets out the requirements for proposed development to be of good quality design. Much of this policy is not relevant to this proposal, but it is outlined below for ease of reference:

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'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;*
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- d. is of sustainable and durable construction and adaptable to different activities and land uses;*
- e. comprises details and materials that are of high quality and complement the local character;*
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
- g. is inclusive and accessible for all;*
- h. promotes health;*
- i. is secure and designed to minimise crime and antisocial behaviour;*
- j. responds to natural features and preserves gardens and other open space;*
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
- l. incorporates outdoor amenity space;*
- m. preserves strategic and local views;*
- n. for housing, provides a high standard of accommodation; and*
- o. carefully integrates building services equipment.*

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'

5.48 As previously noted, the siting of the equipment is contained on just the eastern side of the rooftop. Further to this, as previously outlined, siting the antennas towards the edge of the rooftop removes the requirement for much larger, more visually intrusive rooftop support structures such as a stub tower, in order for technical requirements to be met safely.

5.49 It is considered that the proposed scheme, by negating the requirement for larger and potentially more visually impactful ground based or rooftop based equipment, and by providing the least visually intrusive option to meet the technical requirements for VMO2, on a building which hosts well

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established telecommunications equipment, respects the local character and context in terms of its design, and as such is compliant with Policy D1. Whilst it is acknowledged that there will be some level of visual change, it is considered that the option and design put forward amounts to a measured change to the appearance of the surrounding area which should be weighed against the far reaching public benefits of upgraded coverage.

5.50 Policy A1 - Managing Impact of Development outlines requirements of development to ensure that standards of amenity are protected. Given the height of the building compared to surrounding blocks, it is not considered that the proposal will have any impact on loss of outlook or daylight, or any overshadowing. As outlined in previous sections, this installation has been reduced in size and scale as far as technically possible, reducing any visual impact on the surrounding area, whilst providing public benefit in the form of continued and improved electronic communications services for two major mobile operators. Whilst it is acknowledged that there will be some visual change, this visibility does not equate to harm, and will not have an impact on the use or enjoyment of surrounding spaces.

5.51 Policy D2 – Heritage aims to preserve and enhance Camden's heritage assets, including conservation areas and listed buildings. Development within conservation areas is required to preserve or enhance the character or appearance of the area.

5.52 As outlined within the heritage impact assessment, the proposal will not cause any significant harm to the conservation area or the nearby listed buildings, and any limited harm is greatly outweighed by the vast public benefits brought forward by the proposal. Given this is an upgrade to an existing, well established telecommunications site, it is clear that efforts have been made to mitigate the impact of the installation, and design and siting have been determined specifically to reduce any visual impact. As has been outlined in previous sections, it is considered that the impact on the character and appearance of the conservation area in the context of the amount and scale of equipment proposed is wholly appropriate, particularly after factoring it's siting on an existing high-level building, which hosts existing telecoms equipment. Further to this, it is considered that the vast public benefits outweigh any potential harm which may be caused by the installation, utilising the balancing exercise as outlined within paragraph 202 of the NPPF.

National Policy

National Planning Policy Framework (NPPF) 2021

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5.53 Paragraph 7 of the NPPF states: *'The purpose of the planning system is to contribute to the achievement of sustainable development'*, and in paragraph 10 that *'at the heart of the Framework is a presumption in favour of sustainable development'*.

5.54 The NPPF identifies objectives to achieve the aim of sustainable development:

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

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

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.' (paragraph 8)

5.55 The proposal would meet the aims of sustainable development with respect to providing critical mobile digital infrastructure to underpin local economic growth; facilitating social inclusiveness through the provision of effective electronic communication services; and in an environmental role through supporting home-working, for example, which is linked to a reduction in transport emissions and therefore climate change mitigation.

5.56 Paragraph 118 emphasises the significance of delivering the latest communications infrastructure:

'Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.'

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5.57 The proposal is such 'essential' infrastructure, delivering high quality mobile technology, and as such it is national policy that planning decisions should support such proposal.

5.58 The NPPF encourages the use of existing masts for new electronic equipment. The proposal therefore adheres to paragraph 119 of the NPPF which states:

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

Other Relevant National Guidance

UK Digital Strategy

5.59 The UK Digital Strategy was published by the Department for Digital, Culture, Media & Sport in March 2017.

'Broadband and mobile must be treated as the fourth utility, with everyone benefiting from improved connectivity. This will play a crucial role in ensuring that everyone, wherever they live and however they connect, can make full use of digital services and benefit from participation in the digital economy. Improved connectivity also increases innovation and productivity across the economy, bringing significant economic rewards'

Ofcom Reports

5.60 Ofcom's annual Communications Market Reports identified trends which demonstrate reliance on reliable mobile connections:

*'We all need high-quality communications. In the modern world, a huge amount of our time is spent using communications services: for work, to stay in touch with family and friends, and in order to go about our daily lives. **Our ability to access and use reliable mobile and broadband connections has become fundamental to the way we work and live, and to the ability of***

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businesses of all sizes to thrive. For many people, internet connectivity is now as essential as gas or electricity, and access to traditional television, radio, fixed phone lines and postal services continue to remain important.' (2016 report)

- 5.61 Planned economic growth cannot be sustained without the provision of essential utility infrastructure, including access to reliable, resilient and high-speed electronic communications. The proposal would increase the capacity of the base-station to enable it to more effectively serve a higher number of people.
- 5.62 The Operator would provide improved and new communications capability by establishing an additional telecommunications site, which is encouraged within the NPPF.
- 5.63 On the basis of the above assessment, the proposal is found to be wholly appropriate and wholly compliant with local and national planning policy.

Summary

- 5.64 The application seeks planning permission and listed building consent for the upgrade of telecommunications equipment at International Hall. The base station would provide improved 3G and 4G services, as well as new 5G services from the site. The infrastructure will provide improved capacity to provide services to a higher number of people at the same time.
- 5.65 A previous application for a very similar scheme has recently been granted full planning permission by the Local Planning Authority, and this minorly amended scheme, involving the proposed antennas being sited slightly higher and slightly closer to the edge of the rooftop, is a required design change in order for the proposal to be ICNIRP compliant. Despite these changes, the proposed upgrade remains appropriate within its setting, without having a detrimental impact on the surrounding area or surrounding heritage assets.
- 5.66 New communications capability would be provided on an existing building, avoiding the installation of a ground-based mast. The equipment's design is based on the principle of meeting operational requirements whilst minimising impact on the appearance of the surrounding area, as far as operational constraints allow.
- 5.67 The application site does not fall within any environmental designations but is located within a conservation area. The proposal would, however, enable

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improved communication services to be provided to the residents, visitors, commuters and businesses in the surrounding area, whilst ensuring that historic and environmentally sensitive areas are protected.

5.68 In terms of the impact on the heritage assets, any harm would be “less than substantial”. In accordance with paragraph 208 of the NPPF, such harm must be weighed against the public benefits of the proposal which, in this case, are far reaching as set out above. It is considered that the significant public benefits outweigh the less than substantial harm to the setting of the nearby conservation area.

5.69 The improvement of communication services to the surrounding area would contribute to the delivery of a diverse range of benefits with respect to improved digital inclusion, health and social care, economic growth, smart cities and transportation. It is considered that these far-reaching benefits would outweigh the minor visual changes at the site.


Confirmation that submitted drawings have been checked for accuracy

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Signed:		Date:	09/08/2024
	_____		_____
Position:	Town Planner	(on behalf of Cornerstone)	

In the first instance, all correspondence should be directed to the agent.

Cornerstone Industry Site Specific Supplementary Information (England) V.9 – 22.03.2024

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