

TELECOMMUNICATIONS INSTALLATION

FOR

MBNL
(EE LTD AND H3G (UK) LTD)

AT

THE LONDON SCHOOL OF HYGIENE AND TROPICAL MEDICINE

1 KEPPEL STREET
LONDON
WC1E 7HT

SUPPORTING STATEMENT

31st January 2025

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Agents REF: 27469

MBNL REF: 27469 – The London School of Hygiene and Tropical Medicine

1. Introduction

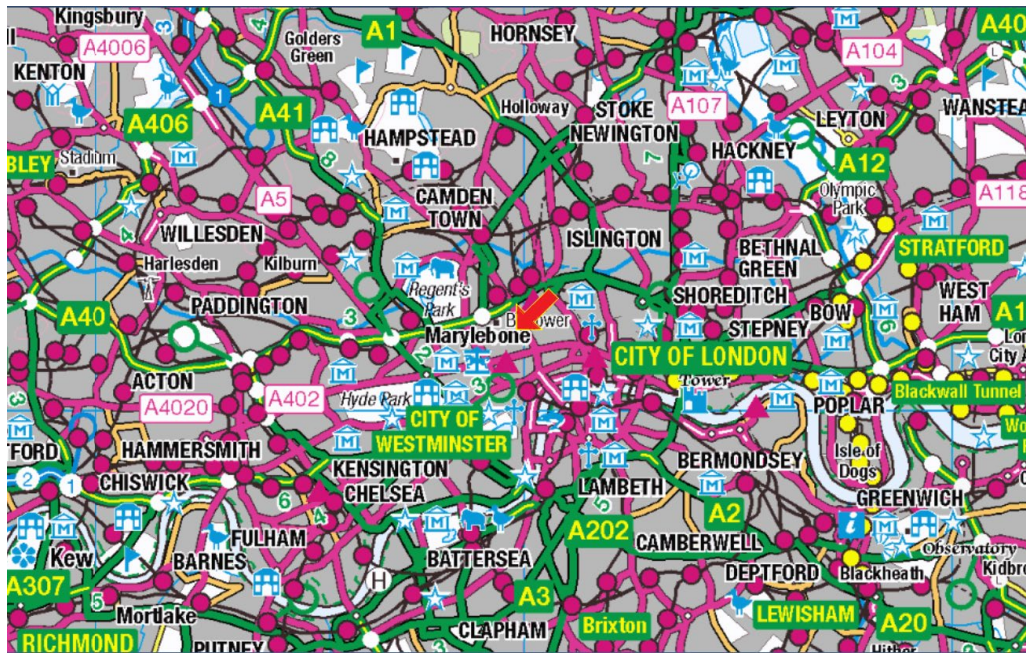
The following application is being lodged by Mobile Broadband Network Limited 'MBNL'. MBNL manages the physical infrastructure that is required by telecommunications operators to provide a telecommunications network. The Company is jointly owned by the mobile operators EE Limited and H3G 'Three'. MBNL are hereby lodging a formal planning application on behalf of EE and H3G 'Three' involving the upgrade of telecommunications equipment at The London School of Hygiene and Tropical Medicine, 1 Keppel Street, London, WC1E 7HT.

The London School of Hygiene and Tropical Medicine is formed of a steel frame and finished in Portland Stone. The building which is made up of four storeys, fronts onto Keppel Street and faces in a south-easterly direction. The property is Grade II listed.

EE and H3G (Three) had permanent and operational telecommunications equipment situated upon the rooftop of the building. The equipment primarily included a series of pole mounted antennas along with a number of cabinets positioned upon the rooftop. However, following some major roofing works, much of the existing equipment has been removed. To ensure there is no loss of network coverage and capacity during the intervening period, temporary equipment has been sited upon some purpose-built scaffolding towards the front of the building. Once the roof works are complete, a permanent solution will again be installed upon the property. The planned upgrade will include the installation of radio antennas, transmission dishes and ancillary apparatus, along with equipment cabinets. Three separate support frames will accommodate the radio antennas and transmission dishes. Two of the support frames will be set upon a metal grillage, along with a small number of cabinets. A separate support frame will be fixed to the opposite side of the roof. The proposed scheme forms the basis of this application which is being lodged under the Town and Country Planning (Development Management Procedure) (England) Order 2015 and in accordance with the Electronic Communications Code (as amended). As the property is Grade II listed, the proposal will also be subject to an application for listed building consent.

A series of maps and images are included within Figures 1 – 4.

Figure 1 – Location of the London School of Hygiene and Tropical Medicine (The Site)



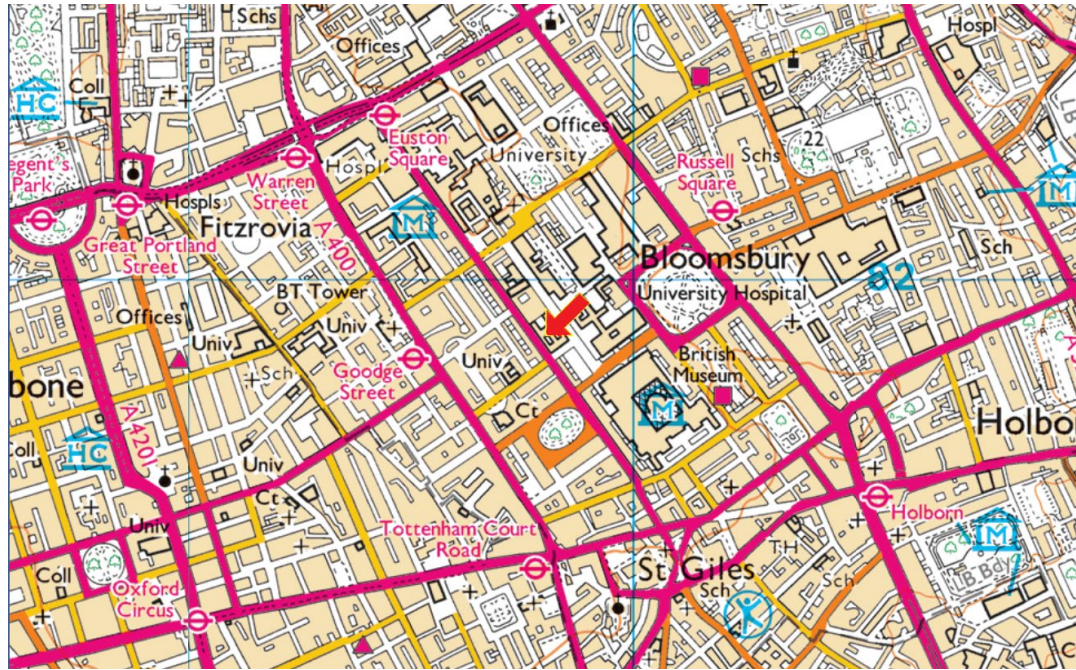


Figure 2 – An aerial view of the site

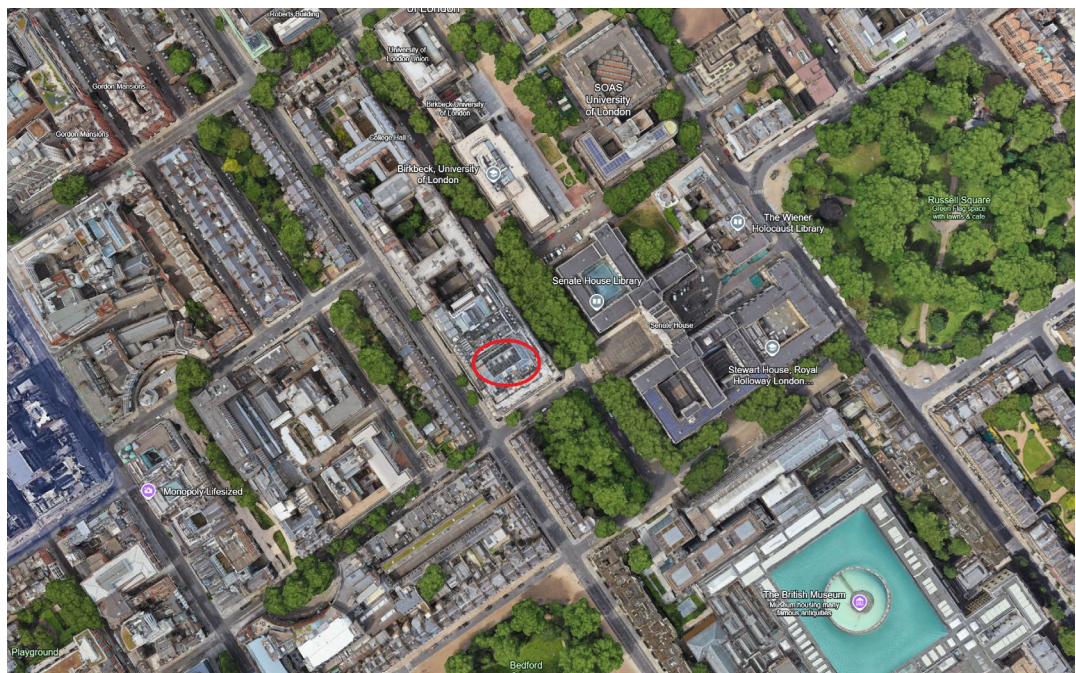


Figure 3 – A birds eye view of the site



Figure 4 – A view of the building from street level



2. The Proposal

The proposed scheme will comprise the installation of 6no. radio antennas, 4no. transmission and ancillary apparatus attached to three separate support frames, along with 3no. equipment cabinets which shall be positioned upon a metal grillage.

3. The Application Site

The London School of Hygiene and Tropical Medicine is situated on the corner of Keppel Street, Gower Street and Malet Street, sitting opposite a row of terraced houses on Gower Street, a leafy square on Keppel Street (Malet Street Gardens) and opposite Senate House Library which fronts onto Malet Street. Senate House, part of the University of London, is formed of approximately 19 storeys and stands at some 64 metres in height. There are a number of trees along the south-east and north-east sides of The London School of Hygiene and Tropical Medicine (The Site). Notwithstanding Senate House, the majority of buildings within the immediate vicinity consist of 5-storey terraced town houses finished in traditional brick. The surrounding area is very well developed and includes mainly residential townhouses/apartments, offices, a hotel and educational establishments. The local area forms part of the Bloomsbury Conservation Area.

The application site is situated upon a section of flat roof towards the centre of the building at 28+ metres above ground level. A metal grillage with two separate tripod support frames and 3no. cabinets will occupy an area of roof on the south-western side of the building. A separate tripod support frame will be positioned on the north-eastern side of the roof. A narrow cable tray will run between the two locations.

An illustration of the application site is included within Figures 5 – 7.

Figure 5 – Image obtained from Google Earth – looking in a north-easterly direction.

The approximate location of the telecommunications equipment (the application site) is outlined in red.

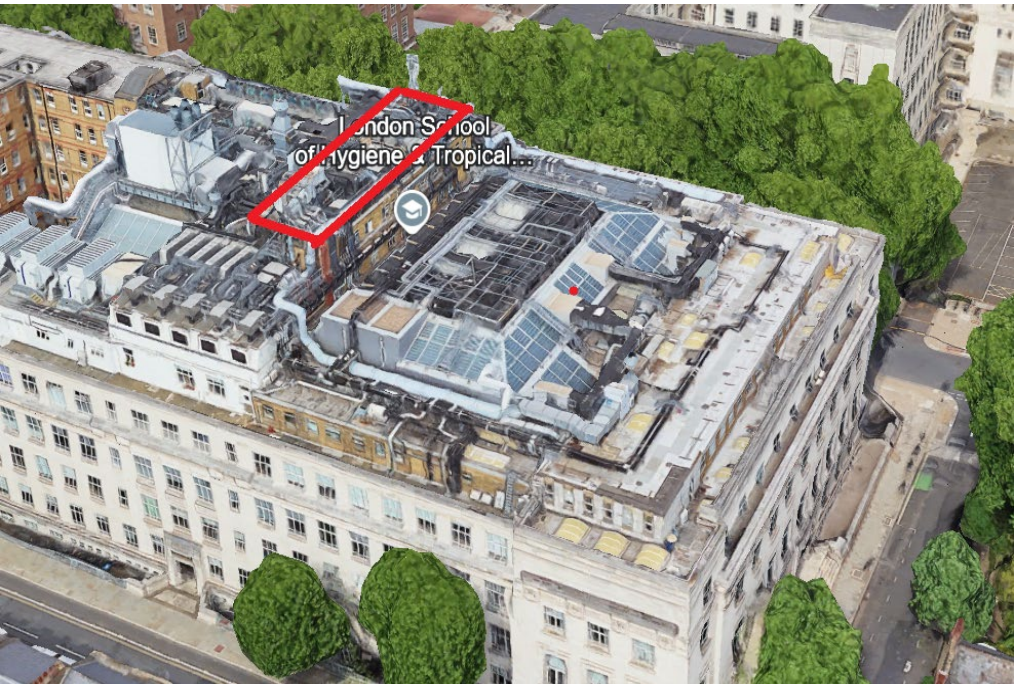


Figure 6 – Extract from the planning drawings.

The application site will occupy two sections of the rooftop. A cable tray (housing cabling) will link each of the locations.

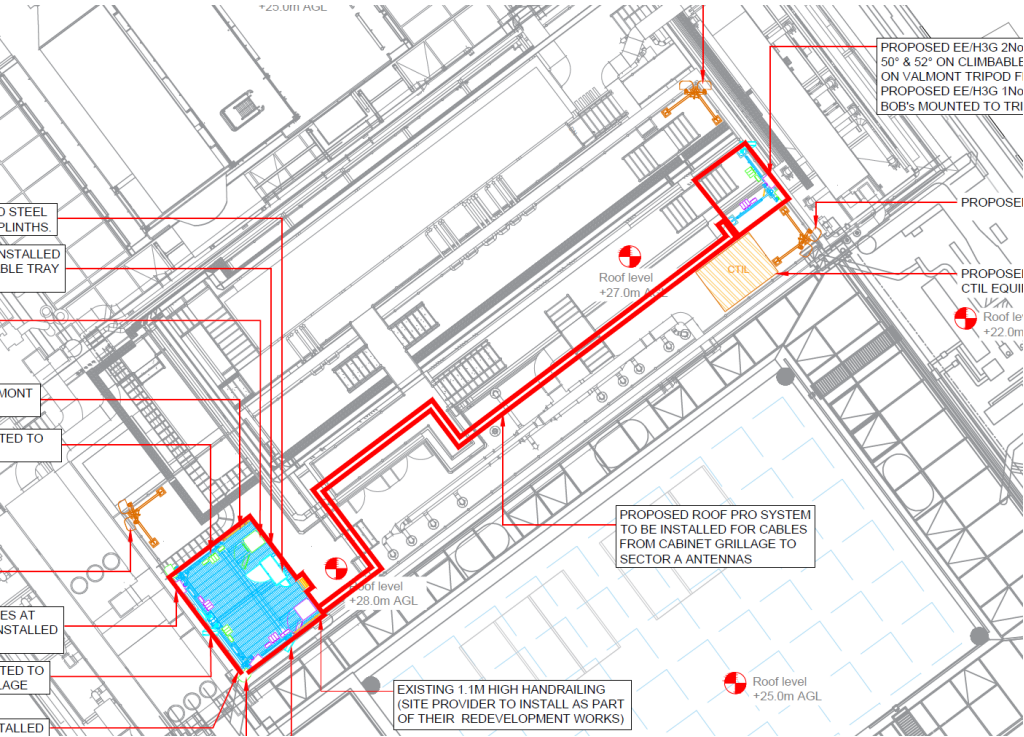
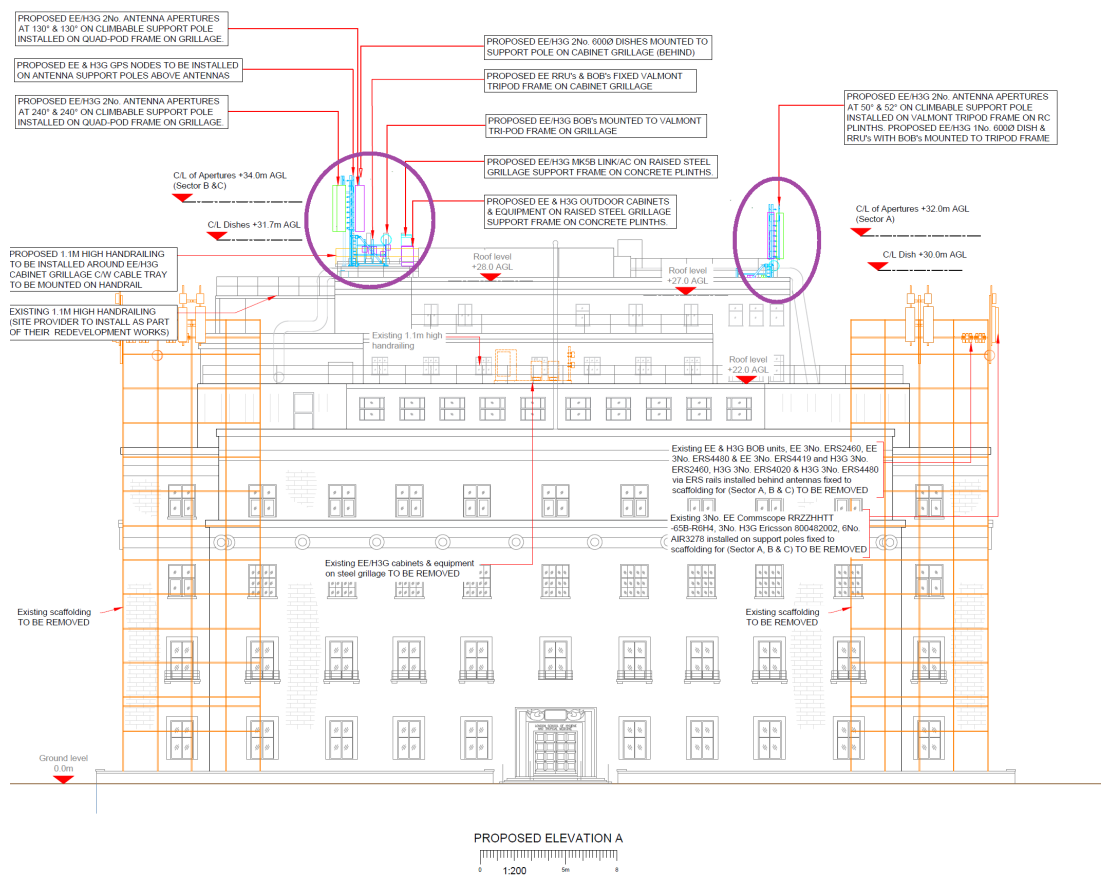


Figure 7 – Extract from the planning drawings (proposed elevation).

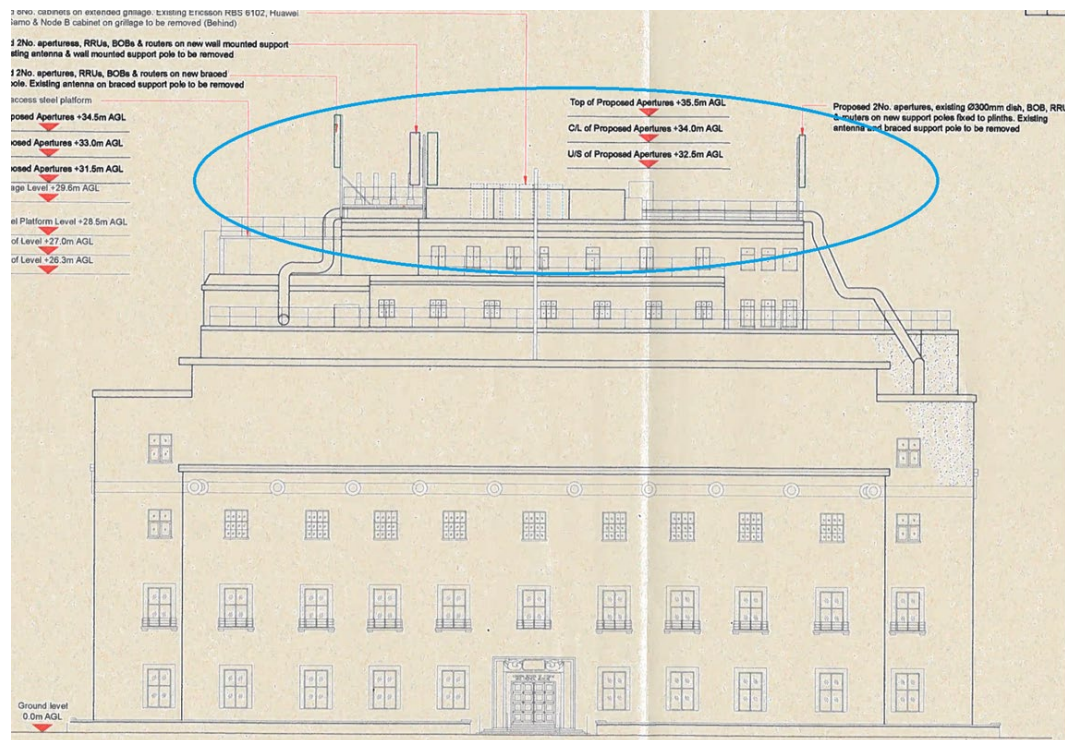


4. Background

As mentioned within the covering letter and introduction (above), EE and Three initially had telecommunications equipment installed upon the building. However, to allow for the significant roof repairs to be completed, the equipment has largely been removed. Please see Figure 8

Figure 8 – Extract from historic drawings of the initial EE and Three telecommunications equipment.

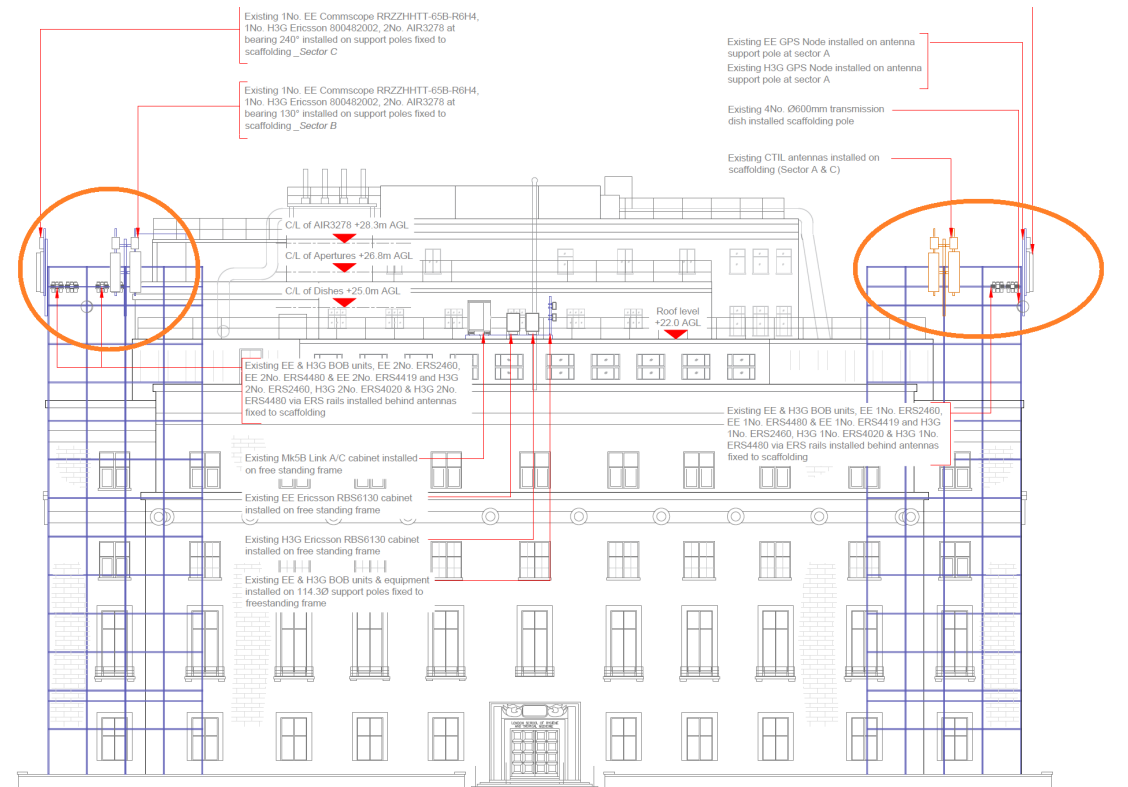
The telecommunications equipment has largely been removed, allowing for the roof works to be undertaken.



In the intervening period and to ensure any loss of network coverage and capacity is minimised, EE and Three are occupying purpose-built scaffolding towards the front of the building. The scaffolding is allowing EE and Three to continue operating from the property while the roof works are undertaken. Once the works are complete and assuming planning permission and listed building consent is granted, EE and Three will relocate back onto the building. The temporary scaffolding will be removed thereafter. Please note, the mobile operators O2 and Vodafone (under Cornerstone) are also temporarily occupying the scaffolding after removing their equipment from the rooftop. Further details are included within Figure 9.

Figure 9 – Extract from the drawings which shows the telecommunications equipment attached to some temporary scaffolding.

The scaffolding is allowing EE and Three, along with O2 and Vodafone to continue operating from the property while the roof repairs are conducted. Once the repairs are finalised and providing permission for the permanent solution is granted (full planning and listed building consent), the scaffolding will be removed.



5. Pre-Application Consultation

Consultation has been carried out with the planning department at Camden Council. An email was sent to the Council's planning department on Monday 20th January 2025. The correspondence included a covering letter, set of planning drawings and site detail sheet. The detail sheet included a written explanation for the proposed scheme, along with maps and visual aids.

A response was received from the planning department on the 23rd January (received by email). Without prejudice, the Council advised a pre-consultation fee of £1,520.50 would be required before the pre-consultation application could be validated. Due to time constraints and the cost of obtaining pre-application advice, we consider all matters associated with this application can be addressed as part of the submission.

As outlined within the supplementary information pack (appendix 2), the site was assessed against the Traffic Light Rating Form in accordance with Code of Best Practice on Mobile Network Development. The application site is positioned upon a Grade II listed building and within the Bloomsbury Conservation Area. As a result, a rating of AMBER was applied.

In line with the Code of Best Practice, consultation has also been undertaken with the ward councillors (Bloomsbury Ward), namely Councillor Adam Harrison, Councillor Sabrina Francis, Councillor Rishi Madlani and English Heritage. The consultation was again carried out by email which included a covering letter to explain the need for a new site, a set of planning drawings and site detail sheet. The emails were sent on Monday 20th January. At the time of writing, no formal response has been received.

6. Application Background

EE and Three initially had telecommunications equipment installed upon the rooftop of the London School of Hygiene and Tropical Medicine. Due to significant repairs to the rooftop, the equipment was removed. EE and Three plan to relocate back onto the rooftop once the works are complete. The proposal forms the basis of this application.

7. The Need for the Proposal

As outlined above, the proposed scheme is required to maintain network coverage and capacity within the area around Bloomsbury, central London following the removal of telecommunications equipment from the rooftop of the London School of Hygiene and Tropical Medicine, to make way for significant roof repairs.

Once the roof repairs are completed, EE and Three plan to relocate back onto the building. The proposed scheme will maintain vital network coverage and capacity within the local area. The site will provide users with continued access to 4G and 5G high-speed internet connectivity to the benefit of those living, working, visiting and studying within the area.

A base station operates by receiving and transmitting to mobile devices, such as smartphones or tablets using radio waves. A base station is similar to television and radio reception, except the communication is two way and is achieved by the radio antennas, dishes and other electronic communications apparatus.

The surrounding area is built up featuring many tall buildings and trees. The property in question is over 28 metres in height which will ensure the transmission equipment (radio antennas and transmission dishes) remain clear of obstructions which could otherwise block or hinder the radio signals.

8. Site Search/Alternatives Discounted

The following factors apply to the siting and design of the proposed site/scheme:

- Siting – The site has been strategically positioned to fit within the wider pattern of sites supporting the networks of EE and H3G.

The location must be elevated in topography to maximise service provision around the inner city area of Bloomsbury, but not so high as to interfere with other sites on the wider network. As outlined in Figure 10 (above) the target area is very confined. The position of the site upon the

rooftop will allow the radio signals to be focused on the many buildings and streets within the locality.

- **Design** – The telecommunications equipment will comprise of radio antennas and transmission dishes which will be pole mounted around a section of flat roof, along with a small number of cabinets and ancillary equipment, primarily small boxes, upon a metal grillage. The equipment is small scale functional apparatus which is not an uncommon sight within such inner city locations.
- **Height** – The radio antennas (the most elevated element of the apparatus) will be situated at a mean height of 32 and 34 metres above ground level. It is important the antennas are elevated above intervening features to ensure the radio signals can be sent and received without interruption and to avoid clipping of the rooftop edge, e.g. where part of the signal omitted by the antenna is blocked by the rooftop itself.
- **Access** – The site will be accessed from within the building which in turn is accessed from Keppel Street. A crane will be required to install the apparatus from Mallet Street. However, the necessary permits will be obtained from the highways authority in advance.

The proposed scheme is largely similar to the former installation of telecommunications equipment which was removed to make way for the roof works. The proposed scheme will offer sufficient height to achieve the operational requirements of EE and H3G, while the flat roof which forms part of the building will again allow the discreet siting of telecommunications equipment as described above.

9. Design Statement

Telecommunications development is covered by the Camden Local Plan (adopted in July 2017).

There is no specific telecommunications policy within the Local Plan. Nevertheless, telecommunications is mentioned within the local plan and for ease of reference, the specific wording is highlighted. Furthermore, the following policies are considered relevant:

- Policy E1 Economic Development
- Policy D1 Design
- Policy D2 Heritage

Policy E1 Economic Development

“The Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses.

We will:

- a. support businesses of all sizes, in particular start-ups, small and medium-sized enterprises;*
- b. maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;*
- c. support local enterprise development, employment and training schemes for Camden residents;*
- d. encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;*
- e. support the development of Camden’s health and education sectors and promote the development of the Knowledge Quarter around Euston and King’s Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan;*
- f. direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031;*
- g. support Camden’s industries by:*
 - i. safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers;*
 - ii. supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites;*
 - iii. safeguarding the Kentish Town Industry Area;*
 - iv. promoting and protecting the jewellery industry in Hatton Garden;*
- h. expect the provision of high speed digital infrastructure in all employment developments; and*
- i. recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.”*

Additional notes: digital infrastructure

“5.10 The Council recognises the importance of digital infrastructure in enterprise development and expects electronic communication networks, including telecommunications and high speed broadband, to be provided in business premises.”

| <i>Item No.</i> | <i>Infrastructure item / programme name</i> | <i>Project / programme description</i> | <i>Location</i> | <i>Delivery Lead</i> | <i>Delivery Period</i> | <i>Comments</i> |
|-----------------|---|--|---|--|------------------------|--|
| 66 | Digital Connectivity | Improved internet access through the acceleration of high speed connectivity, including public wireless systems. | Borough wide with a focus on where this maximises benefits for the community and business | LB Camden, GLA, BT Openreach and other industry partners | Plan period | Camden's Digital Strategy sets out a series of actions to support the uptake of high quality, next generation connectivity. This includes better connections for businesses and residents already on-line, tackling the 'digital divide' where people lack the confidence to use IT and the greater use of digital technology in delivering services |

In response to Policy E1 - Economic Development:

The proposed scheme meets elements of Policy E1 as outlined below:

In this case, the proposed development involves placing a small amount of telecommunications equipment upon the rooftop of a Grade II listed building known as The London School of Hygiene and Tropical Medicine, which will replace a previous telecommunications site which occupied the very same building and rooftop. As detailed within this document, the mobile operators EE and Three had to vacate the building due to some significant rooftop repairs. While EE and Three are utilising a temporary site at the property, a new permanent solution will ensure that network coverage and capacity is maintained within this very busy area of central London. As outlined within the Local Plan, the importance of digital connectivity is recognised and in this particular case, the local area around Bloomsbury will suffer from a loss of coverage and capacity if a permanent rooftop solution cannot be implemented.

The proposed scheme is considered to fully meet the objectives of Policy E1 – Economic Development and the Camden Digital Strategy of maintaining high-speed connectivity within the area. As referenced, the proposed site will provide a combination of Fourth Generation (4G) and Fifth Generation (5G) coverage and capacity which will benefit residents, workers, visitors and those studying within the area (note, there are many educational establishments within Bloomsbury).

Policy D1 Design

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.

In response to Policy D1- Design:

The proposed scheme meets elements of Policy D1 as outlined below:

- a. **Respects local context and character** – The proposed scheme involves deploying small-scale telecommunications apparatus upon the rooftop of a relatively large 4-storey building. The equipment will primarily include radio antennas and transmission dishes fixed to three small tripod support frames, along with ancillary apparatus (typically small boxes) and equipment cabinets attached to a metal grillage. Such equipment is not an uncommon sight within such inner city locations. Nevertheless, the apparatus will be positioned towards the centre of the large rooftop which is home to other plant and equipment. As a result, due to the position of the equipment upon the rooftop and scale of the apparatus proposed, it is envisaged that views of the apparatus will be very limited, particularly from ground level. The scheme should have no greater visual impact than the initial rooftop site which has since been removed (please see Figure 8 (above)).
- 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** – One of the many benefits of modern high-speed telecommunications connectivity is the flexibility of allowing users to work, meet and shop on line, rather than having to physically travel.
- e. **Comprises details and materials that are of high quality and complement the local character** – The proposed equipment is functional infrastructure which has been specifically designed to support a telecommunications network. Nevertheless, the infrastructure is visually similar to the plant and equipment that will be found on many urban and inner-city buildings. As detailed in point a, the proposed scheme will largely resemble the former rooftop solution which was removed to make way for the building works.
- h. **Promotes health** – Improved connectivity has real, tangible benefits for people and businesses, such as booking GP appointments online, using applications ‘apps’ to communicate with friends and family, boosting tourism and agriculture through platforms such as social media, which is now an important marketing tool for businesses and having access to emergency services etc.
- i. **Is secure and designed to minimise crime and antisocial behaviour** – The telecommunications equipment will be positioned on a secure rooftop and is specifically designed to prevent unauthorised access.
- j. **Responds to natural features and preserves gardens and other open spaces** – Positioned upon an existing building, the small-scale development will have no impact to gardens and other open spaces.

- m. **Preserves strategic and local views** – The proposed scheme involves deploying a small-scale apparatus upon an existing building. Due to the overall position and scale of the apparatus along with the building to which the equipment will be attached, the proposed scheme should have no impact upon strategic and local views.
- o. **Carefully integrates building services equipment** – The telecommunications apparatus will be positioned upon an established rooftop which is home to other plant and equipment. The equipment will be positioned alongside this apparatus. As outlined above, the rooftop was previously utilised by EE and Three before the apparatus had to be removed, making way for works to the building. The latest scheme is largely similar to that of the existing. Again, details of the initial scheme can be found within Figure 8.

Policy D2 Heritage

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use. The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.*

Conservation areas

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

The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*

- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.*

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building;*
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and*
- k. resist development that would cause harm to significance of a listed building through an effect on its setting.*

Archaeology

The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.

The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

In response to Policy D2 - Heritage:

The proposed scheme meets elements of Policy D2 as outlined below:

Please see the separate Heritage Impact Assessment (Appendix 2) which has been included as part of this submission.

10. Access Statement

Public Access Statement

Radio base stations are not designed to be accessible by the public. Therefore no specific public access provisions are required to be incorporated into the design of the proposal.

Construction and Maintenance Access

Access to the site for maintenance is indicated on the drawings and will be made internally from within the London School of Hygiene and Tropical Medicine. A crane will be required during the initial site build. However, the necessary permits will be obtained from the highways authority with regards to any lane or road closure that may temporarily be required.

11. Health and Safety

An ICNIRP certificate is included with this application, in accordance with ICNIRP guidelines.

12. Planning Policy Framework/Development Plan Policy

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF December 2024) sets out the Government's planning policies for England and how these are expected to be applied at a Local level. It provides a framework within which local people and their representative Councils can shape distinctive local and neighbourhood plans, which reflect the needs and priorities of their own communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which gives rise to the need for the planning systems to perform a number of roles including;

- Economic Role - contributing to building strong, responsive and competitive economy;
- Social Role - Supporting strong vibrant and healthy communities; and
- Environmental Role - Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. The NPPF recognises the vital importance of high-quality telecommunications and dedicates a whole chapter to this area. Chapter 10 of the NPPF outlines the Governments support for high quality communications. The paragraph extracts highlighted below, clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 119 states:

“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).”

It continues in Paragraph 120

“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.”

Paragraph 121

“Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:”

“a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and”

“b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.”

Paragraph 122

“Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:”

“a) the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and”

“b) for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or”

“c) for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met”

In accordance with the above, the following points apply:

- Operators always follow the sequential approach to site selection. Where an existing site can be shared or upgraded, this will always be adhered to before a new installation is put forward for consideration. In this instance, the proposed scheme involves upgrading a former rooftop telecommunications site which had to be decommissioned to make way for some unrelated building works. Please note, the site will continue to accommodate the mobile operators EE and Three.
- The site will maintain 4G and 5G network coverage and capacity around the locality of the London School of Hygiene and Tropical Medicine which is situated within the area of Bloomsbury.
- The site is not within a safeguarding area e.g. airport.
- A certificate is enclosed with the application to confirm the installation will be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionising Radiation ‘ICNIRP’.

The support for telecommunications and the need not to constrain Operators is laid out in Paragraph 123:

“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.”

In March 2017, the Department of Culture, Media and Sport (DCMS) released an updated UK Digital Strategy (UK Digital Strategy). The strategy details the goals to ensure that the UK has a *“world-leading digital economy that works for everyone”*. The UK Digital Strategy includes details of the public benefits of access to high quality communication services. As the UK is considered to be behind other nations in the provision of fast, consistent and reliable mobile connectivity, the DCMS, in conjunction with the new Electronic Communications Code (2018), intends to make it easier for operators to upgrade and share their equipment with other operators in order to help increase coverage to ensure the future growth of the UK.

The proposed base station is required to provide the latest telecommunications connectivity along with additional coverage and capacity

around a very busy and developed area of central London, ensuring the area has a reliable connection into the future.

As per the above, the proposed development accords with policies set out in the National Planning Framework (NPPF). In particular, paragraphs 119 and 120 of the NPPF set out the importance of the provision of reliable, advanced communications apparatus for economic and sustainable development. In line with these policies, the proposed development will ensure that reliable, high-speed connectivity within the local area is maintained.

13. Conclusions

The proposed scheme is of vital importance to ensure there is no loss of mobile connectivity and capacity in the area following the removal of the former site to make way for large-scale roofing works to the London School of Hygiene and Tropical Medicine.

The supplementary information and the other accompanying material, including this planning statement and the heritage assessment demonstrate the proposal accords with the Camden Local Plan and National Planning Frameworks in accordance with the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail, complies with the policy objective of providing services and, at the same time, minimising potential environmental impact. It should also be noted that the proposed scheme is of a similar design to the former rooftop telecommunications site (pole mounted antennas/dishes and ancillary apparatus) that has been removed. As a result, we consider the current scheme will have no greater visual impact upon the surrounding area and achieves a suitable balance between meeting the operational requirements of EE and Three, while minimising impact upon the local area.

In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one to which the presumption in favour of granting planning permission applies. We consider the proposed development is fully compliant with the local plan and we would urge Camden Council to approve this telecommunication installation.

APPENDICES:

- Appendix 1: Supplementary Information Form
- Appendix 2: Heritage Assessment
- Appendix 3: ICNIRP Compliance Certificate
- Appendix 4: Planning Drawings
- Appendix 5: Copy of the pre-application consultation letters and responses