

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Dutch House	Site Address:	The Dutch House
National Grid Reference:	530948, 181597		307 High Holborn Holborn London WC1V 7LL
Site Ref Number:	144584 25	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: N/A – Site upgrade		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: N/A – Site upgrade		

¹ Macro or Micro

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Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: Pre-application correspondence was forwarded to the London Borough of Camden by email on 18 October 2024. To date no response has been received.	

Annual area wide information to planning authority

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


Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: As with all Cornerstone proposals, the proposed works were assessed against the "Traffic Light Rating System" as referred to in the Code of Practice for Wireless Network Development in England. A green rating has been assigned. Consultation was sent by email on 16 January 2023 to the following Stakeholders: <ul style="list-style-type: none"> Holborn & Covent Garden Ward Councillors – Cllrs. Fulbrook, Olad and Vincent. Member of Parliament for Holborn and St Pancras – Sir Kier Starmer. 			
Summary of outcome/main issues raised (include copies of relevant correspondence): No responses have been received.			

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School/College

Location of site in relation to school/college (include name of school/college): There are no schools close to the site. The closest is St Alban's CofE Primary School on Baldwin's Gardens, which is approximately 330 metres from the application site.
Outline of consultation carried out with school/college (include evidence of consultation): Due to the distance involved no consultation has been undertaken.
Summary of outcome/main issues raised (include copies of main correspondence): N/A

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
Details of response: Safeguarding Area Notices have been sent to Heathrow Airport and London City Airport. To date Heathrow have responded raising no objections (any relevant response from London City Airport will be forwarded when received). A copy of correspondence is included with the application documents.		


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:

The host building is a nine-storey commercial building which fronts onto High Holborn, west of its junction with Chancery Lane. The surrounding area is predominantly commercial in character, although there are some buildings in residential use above ground level. The building is not listed, however is located within the Bloomsbury Conservation Area.

The existing Cornerstone installation on the building consists of 3 no. pole mounted antennas around the plant room (2 no. on the northern side of the plant room and 1 no. on the southern side) with equipment cabinets on steel grillage to the east of the plant room. This Cornerstone equipment provides coverage to the area for the Vodafone network. There is a further installation on the building, consisting of 6 no. antennas and an equipment cabin, which provides coverage to the area for UK Broadband.

A planning application was approved in 2023 (reference 2023/0687/P) to upgrade the cornerstone installation on the building. This upgrade consisted of the installation of 2 no. additional antennas, 2 no. transmission dishes and 3 no. equipment cabinets on the building. This was proposed to provide new 3G and 4G coverage and capacity to the surrounding area for the VMO2 network (trading as O2). This 2023 consent has not been implemented.

This new revised proposal is being submitted for two reasons. Firstly, it will also allow for VMO2 to also gain 5G coverage from the site. Secondly, it allows Vodafone to also upgrade its equipment on the site so that it can also provide 5G coverage to the area.


As with the previous application, the proposal involves the installation of 2 no. additional pole-mounted antennas and 2 no. transmission dishes on the plant room, along with 3 no. additional equipment cabinets on the existing grillage, for the VMO2 network. The Vodafone element of the upgrade consists of the replacement of the existing 3 no. antennas, and the refreshing of the radio equipment within the existing cabinets. The main difference between this proposal and the recently approved scheme is that one of the Vodafone antennas is being relocated towards the front (northern) elevation of the building. This is to ensure that it complies with ICNIRP regulations. To assess its impact photomontages have been produced. These are included with the application documents and will be discussed later in this document.

A photograph of the host building is included below:

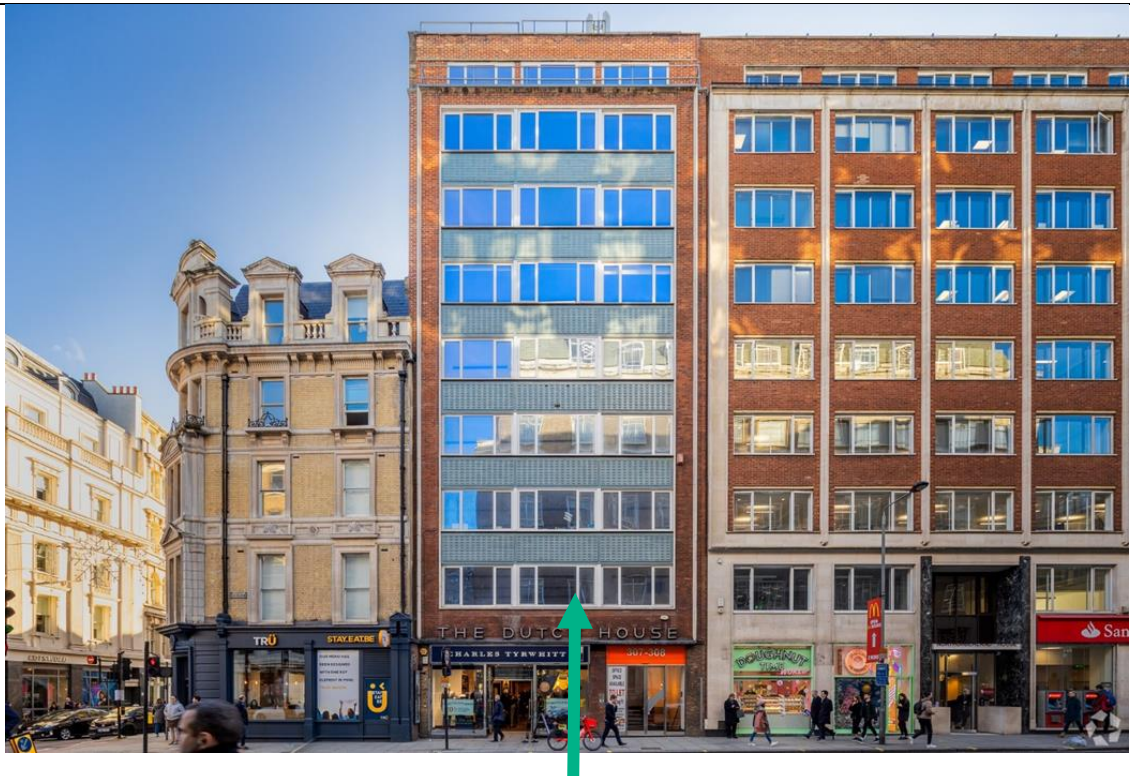
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The Dutch House


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

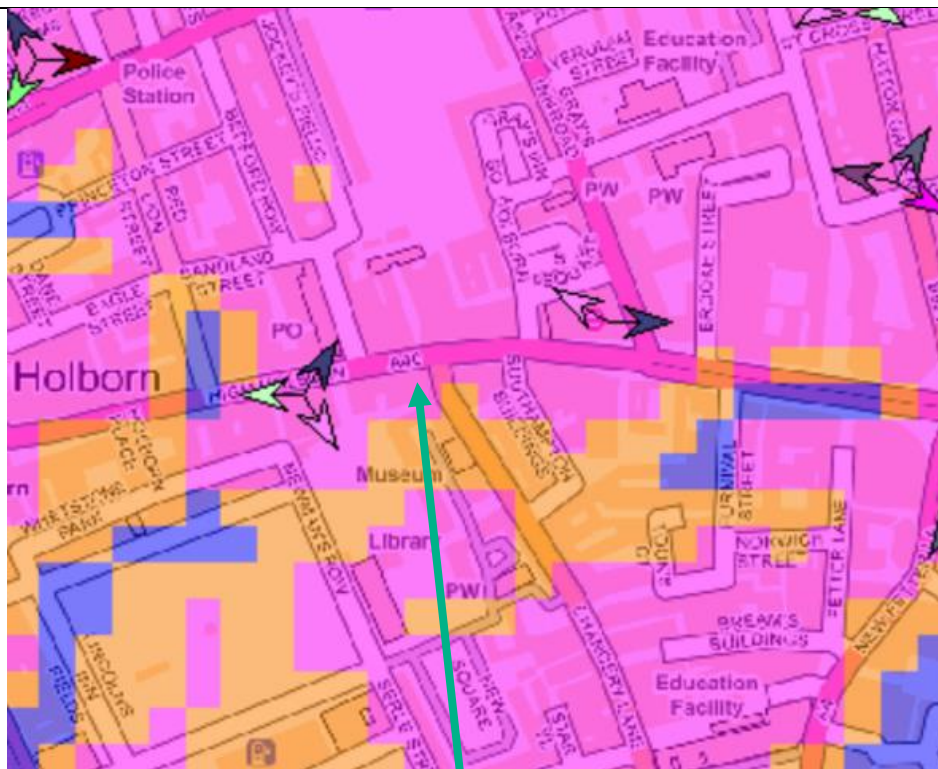
The coverage plots below shows the existing and proposed VMO2 4G coverage in the area, with the site location highlighted:

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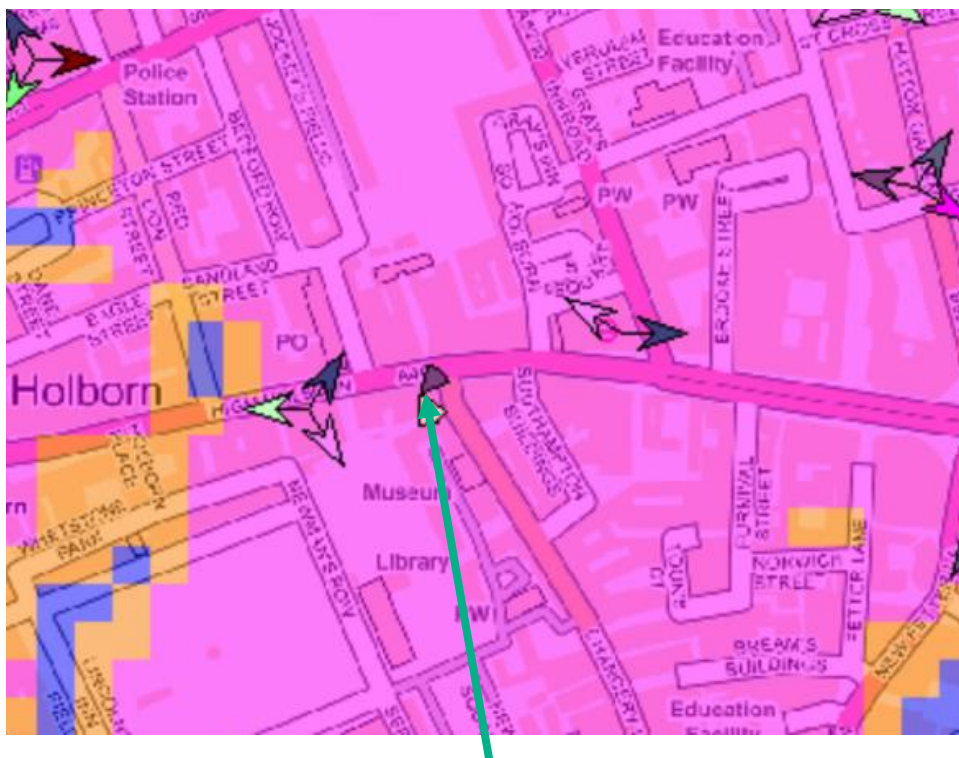
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Existing VMO2 4G coverage




Proposed VMO2 4G coverage

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Ideal coverage levels for this busy area of London, to provide an adequate level of coverage and capacity to meet demand are shown as pink on the plots. The first plot confirms that levels fall below the required level, however the proposed plot confirms that the site would improve coverage to good levels. Additionally, a significant requirement for the site for VMO2 is to provide additional capacity into this busy area.

In addition, the site is also needed to provide coverage and capacity for the latest 5G technology.

The plots are also attached as a separate item within the application documents. The Radio Planner has summarised the requirement for the site as follows:


"VMO2 require 80263 to provide coverage and capacity to this high profile area of Chancery Lane, the new site will bring improved inbuilding coverage to customers in the area as well as much needed capacity as surrounding sites struggle to provide the required data rates in the area. The existing site to the West is restricted in design and can only provide limited technologies and the site to the east is restricted to provide coverage in this direction and area."

Type of Structure (e.g. tower, mast, etc):		Rooftop
Description: The installation of 2 no. additional antennas and the replacement of 3 no. antennas, the installation of 2 no. transmission dishes and 3 no. equipment cabinets and ancillary works thereto.		
Overall Height:		32.0 metres (to top of antennas)
Height of existing building (where applicable):		25.2 metres (main roof level)
Equipment Housing:		
Length:		2 x 0.75m/ 0.705m
Width:		2 x 0.6m/ 0.83m
Height:		2 x 1.8m/ 2.07m
Materials (as applicable):		
Tower/mast etc – type of material and external colour:	N/A	
Equipment housing – type of material and external colour:	Steel with a grey finish.	

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Reasons for choice of design, making reference to pre-application responses:

In designing the proposed scheme, 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.

There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air or fixes them to a building or structure 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 power source (meter cabinet or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

In all aspects of the design now put forward the smallest practical components have been utilised to ensure that the visual impact of the development is kept to the absolute minimum. The height of the proposal was determined by the network radio planners as being the minimum at which adequate enhanced coverage to the target area could be achieved. Specifically, the antennas need to be high enough to ensure the signal from the antennas will propagate effectively above the buildings in the local area and also comply with strict ICNIRP requirements.

Two additional antennas are proposed for the VMO2 network, and these would be located around the existing plant room, in the same locations as previously approved. Additionally, the proposed additional equipment cabinets are to be sited on the existing grillage to the east of the plant room. Although these are in a slightly different location to the previous approval, they are of the same dimensions and would not have any additional impact.

The upgrade of the Vodafone equipment has also been designed to keep impact to a minimum, as far as practicable. Two of the replacement antennas are proposed to utilise existing support poles, one on the northern side of the plant room and one on the southern side. Rather than propose additional equipment cabinets for the additional radio equipment for 5G coverage, the drawings confirm that the existing equipment cabinets are to be refreshed, ensuring there would be no additional impact from this element of the scheme.

Strict ICNIRP requirements, which in particular affect proposal for 5G antennas, have resulted in an increase in impact compared to previous proposals on the

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building. 5G antennas have more restrictive ICNIRP requirements, resulting in the need for them either to be higher on buildings, or located closer to the edges of buildings. In this case this has led to the proposed antennas around the plant room slightly increasing in height. The recent 2023 consent have an approved antenna height of 31.7 metres to the top of the antennas. This revised proposal marginally increases the height of the antennas around the plant room to 32.0 metres.

The relocated antenna, towards the northern elevation of the building, has been proposed in this location to provide continued and enhanced coverage to the north-western sector for the Vodafone network. Currently, there is an antenna on the plant room which provides coverage in this direction. With the strict ICNIRP guidelines, from the plant room it is not possible to provide enhanced coverage, in particular to provide 5G coverage from this location. An antenna on the plant room would fire across a neighbouring rooftop which is in a separate ownership, and where the operator has no control over access to this rooftop. It is therefore classed as a public area, and an antenna in this location would not be ICNIRP compliant to provide the upgraded coverage. Therefore, to be able to provide the required level of coverage, with a scheme that is ICNIRP compliant, it is necessary to locate the antenna towards the front of the building. Therefore, impact on the building has been minimised as far as practicable.

With the proposed scheme implemented the building would provide coverage to the area for the Vodafone and VMO2 networks, as well as continuing to provide coverage for UK Broadband. With the limited level of impact that would arise, it is considered preferable to provide coverage from a single building than to search for an alternative additional building, which would also be either within or adjacent to a conservation area, and close to listed buildings.

Overall, it is considered that the design is appropriate to the site and surrounding area and avoids any unacceptable level of impact on visual amenity or on heritage assets. The minimal impact would be outweighed by the significant public benefits of the proposal.


The development would provide enhanced coverage and capacity for the VMO2 and Vodafone networks. It is noted that the equipment would be visible, however visibility does not necessarily equate to harm. Setting the significant benefits of the proposal against the limited harm, the benefits outweigh the minimal harm.

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Health and Safety - including ICNIRP compliance

International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.

When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.

In order to minimise interference within its own network and with other radio networks, Vodafone and VMO2 operates its networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.

As part of Vodafone and VMO2's network, the radio base station that is the subject of this application will be configured to operate in this way.

All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.

The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.


A Certificate confirming ICNIRP compliance is included with the application documents.

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4. Technical Justification

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

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

The proposal would provide enhanced coverage and capacity to the area for the Vodafone and VMO2 networks.

The first generation of services provided voice calls, the second generation (2G) allowed basic data such as texting and the third generation (3G) offered internet access and the development of apps. Since then, the smart phone has developed further, and the fourth generation has brought video and much faster data speeds allowing the integration of the smart phone into wider use.

The next generation of mobile telephony is 5G which brings greatly increasing data speeds. The advantages this presents range from near-instant downloads of HD films to connected cars, smart medical devices and smart cities. To bring this new technology a mix of upgrades to existing sites and the building of new sites is required. New sites will be needed for many reasons, including that the higher radio frequencies used for 5G do not travel as far as those frequencies currently in use leaving gaps in the network.

Although 5G will undoubtedly bring new opportunities and huge benefits to society, we cannot escape from the requirement that new structures, antennas and ancillary equipment will be needed. It has been acknowledged by Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks. This is one of the many additional installations that will be needed to provide enhanced services.

The higher frequencies that 5G will use can provide more bandwidth and thus greater capacity but the signal will not travel as far as those of previous generations. The implications to the built environment will be that more infrastructure needs to be deployed, as in this case.


5G is the next generation of mobile internet connectivity, offering faster speeds and more reliable connections on smartphones and other devices than ever before. Compared to even the most recent and efficient generation of mobile network, 4G, 5G is set to be far faster and more reliable, with even greater capacity and lower response times.

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A letter from Matt Warman MP, the then minister for Digital Infrastructure, to English Local Authority Chief Executives, re-affirmed the importance of digital connectivity. The letter dated 24 May 2021 (included within the application documents) notes: *'Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data 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...The planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliant on mobile connectivity.'*

The following examples below illustrate practical applications of 5G Connectivity:

Education:

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.

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:

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.

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.


As is often the case with the introduction of new mobile technologies, we are aware that there has been a lot of coverage on the internet and in the media with regard to the possible health implications of 5G rollout in the UK. Exposure to non-

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ionising radiation is regulated and limited and all UK base stations are required to comply with health and safety guidelines set by the International Commission on Non-Ionisation Radiation ('ICNIRP'). This is an independent body of scientists that was set up to provide advice and guidance on the health and environmental effects of non-ionizing radiation which is used in mobile telecommunications. The guidelines set by the commission are in place to protect all members of the public, of all ages and in all states of health and wherever they might be in relation to a base station for 24 hours a day. They are backed by the World Health Organisation, the EU and the UK Government.

The ICNIRP reviewed and updated their guidelines in 2020. The new guidelines provide better and more detailed exposure guidance in particular for the higher frequency range, above 6 GHz, which is of importance to 5G and future technologies using these higher frequencies. The ICNIRP chairman, Dr Eric van Rongen, has advised that "the most important thing for people to remember is that 5G technologies will not be able to cause harm when these new guidelines are adhered to". We confirm that they are adhered to by VMO2 and Vodafone as well as the UK's other mobile operators.

The Director of Mobile UK has also commented on the updated ICNIRP guidelines and stated that *"The consistent conclusion of public health agencies and expert groups is that compliance with the international guidelines is protective for all persons (including children) against all established health risks"*.

Public Health England (PHE) commented in 2019 that *"It is possible that there may be a small increase in overall exposure to radio waves when 5G is added to an existing network or in a new area. However, the overall exposure is expected to remain low relative to guidelines and, as such, there should be no consequences for public health"* <https://www.gov.uk/government/publications/5g-technologies-radio-waves-and-health/5gtechnologies-radio-waves-and-health>.

There has been a significant amount of other independent, peer reviewed, scientific research by recognised bodies that has been carried out into the technology used in mobile telecommunications over several decades. The consensus of the international scientific community is that there has been no convincing evidence to date that RF field exposure below the internationally agreed guideline levels applied in the UK (ICNIRP) causes negative health effects in adults or children. This includes recent reviews of 5G technology.


In January 2019 the Finnish Radiation and Nuclear Safety Authority (STUK) concluded that *"In the light of current information, exposure to radio frequency radiation from base stations will not rise to a significant level with the introduction of the 5G network. From the point of view of exposure to radio frequency radiation,*

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the new base stations do not differ significantly from the base stations of existing mobile communication technologies (2G, 3G, 4G)"
<https://www.stuk.fi/aiheet/matkapuhelinet-jatukiasemat/matkapuhelinverkko/5g-verkon-sateilyturvallisuus>

Similarly, and also in January 2019, the Norwegian Radiation and Nuclear Safety Authority (DSA), commented that *"The overall research shows that the radiation from wireless technology is not hazardous to health, as long as the levels are below the recommended limit values. This is the prevailing view among researchers in many countries today, and it is supported by the EU Scientific Committee. We have used cell phones and radio 5G and transmitters for decades and much research has been done on how this affects our health. Risk factors of importance to public health have not been found. With the knowledge we have today, there is no need to worry that 5G is hazardous to health."*
<https://www.dsa.no/temaartikler/94565/5g-teknologi-og-straaling>.

All Vodafone and VMO2 base stations are designed to be fully compliant with ICNIRP guidelines, and a certificate of compliance is included with the application. In addition, a document entitled 'Mobile UK Health Fact Sheet' is included with the application documents. This provides a simple explanation of 5G and the equipment behind it, including the antennae and the masts, in particular in relation to health issues. Further information is attached in the form of 'Allaying health concerns regarding 5G and exposure to radio waves' and the 'Public Benefit of mobile connectivity' brochure.

An upgraded site is required in the area to meet the ever-increasing demand for mobile services, with the replacement antennas able to provide additional coverage and capacity to the area. As an example of this, a publication from OFCOM in 2022 illustrated the increasing demand for services. A discussion paper entitled "Mobile networks and spectrum - Meeting future demand for mobile data" (full report at https://www.ofcom.org.uk/data/assets/pdf_file/0017/232082/mobile-spectrum-demand-discussion-paper.pdf). Paragraphs 2.5 to 2.7 noted:


"2.5 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.

2.6 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.

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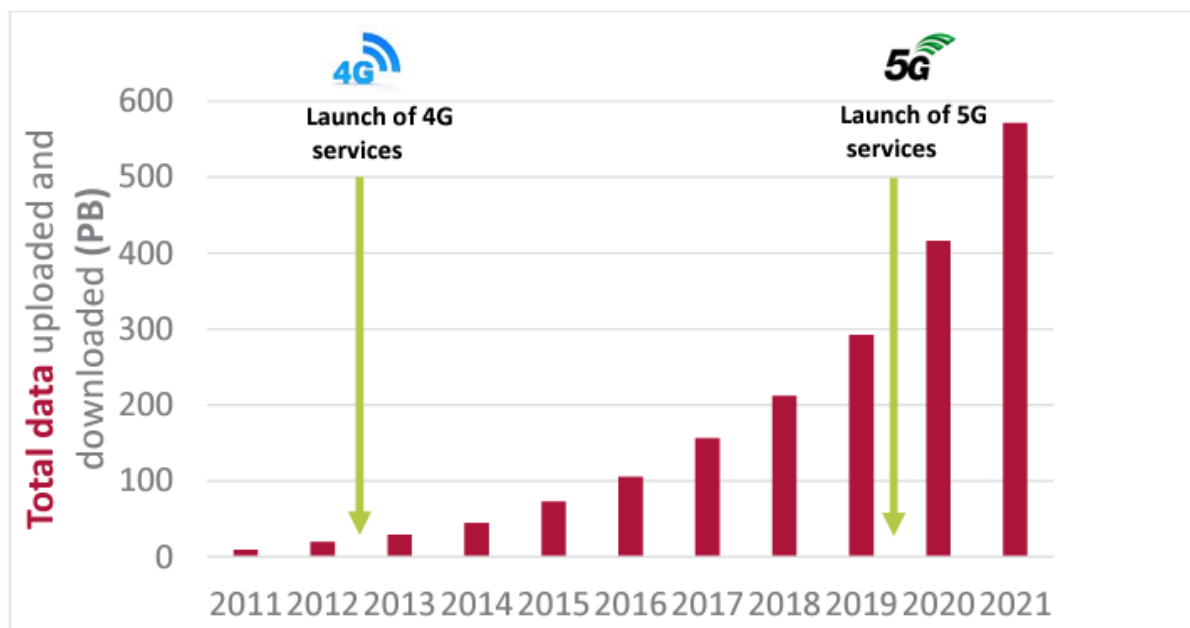
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2.7 We expect demand for mobile data will continue to grow as we rely on it ever more to carry out daily activities like shopping, gaming, banking and watching movies. Demand is likely to be stimulated further as new and more sophisticated applications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

This increasing demand for mobile data was illustrated in the report by the graph below:




Growth of monthly mobile data demand 2011-2021 (Source: Mobile networks and spectrum - Meeting future demand for mobile data)

Further detail 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 on the location of the proposed development.

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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)

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

If no alternative site options have been investigated, please explain why:
Paragraph 120 of the National Planning Policy Framework, in which the Government's supportive stance towards developing high quality communications infrastructure is laid out, states that *"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."*


The proposal is for an upgrade of an established telecommunications site and not for the development of a new site, thus the consideration of alternative sites is not appropriate. The applicant has examined its portfolio of sites in this region and determined that there are no alternatives in the area which can be upgraded to meet the specific technical requirement. The application site represents the only feasible option in this instance which allows the requirement to be met without the deployment of an additional base station in the locality.

As there is a suitable site to be upgraded, and this can be undertaken without an unacceptable level of harm to the surrounding area, in this instance no search for alternatives has been undertaken.

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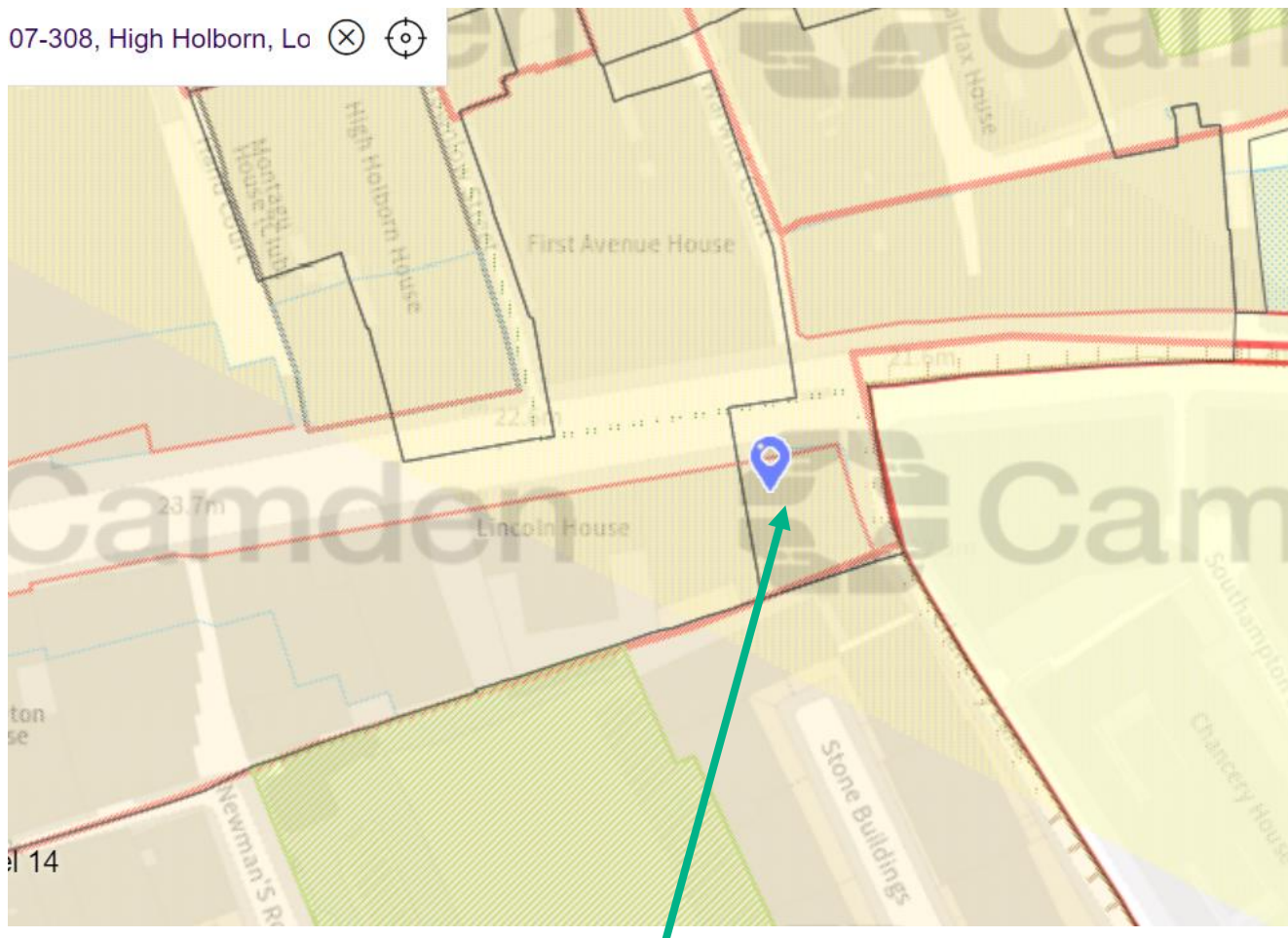
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Land use planning designations:

07-308, High Holborn, Lo  



Site location

The map above is an extract of the Council's interactive policies map. The map confirms the host building is located within a conservation area (yellow shading).

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


Heritage Statement:

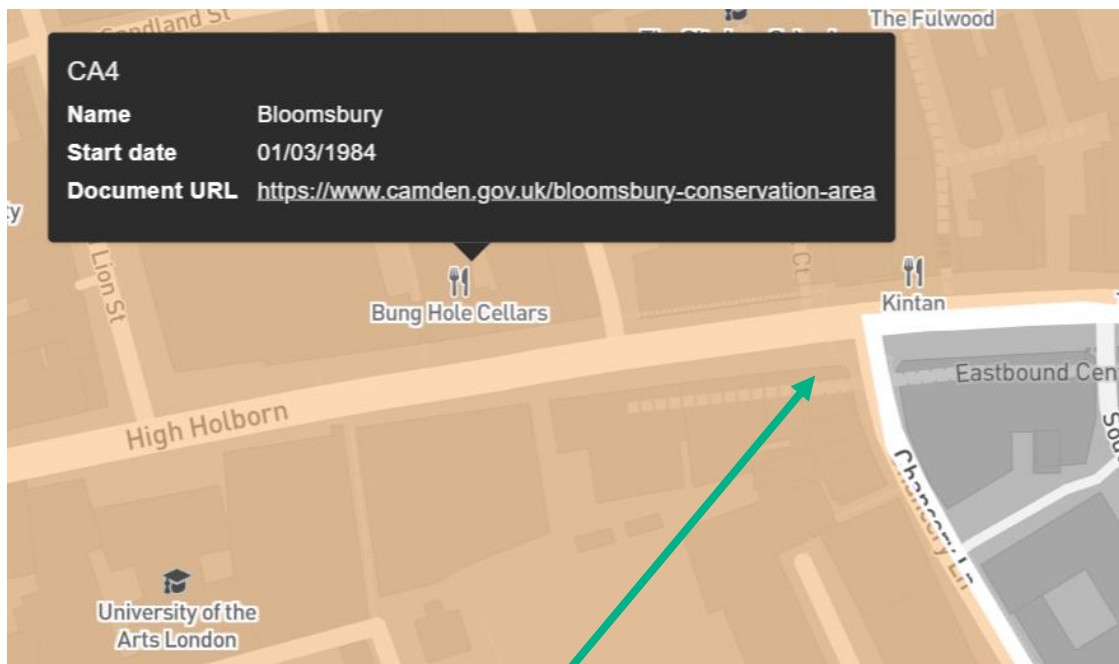
The main issue with the proposed development is considered to be its impact on heritage assets. The site is located within a conservation area, the Bloomsbury Conservation Area, as confirmed by the extract below from the Council's interactive conservation areas map (with the site location annotated):

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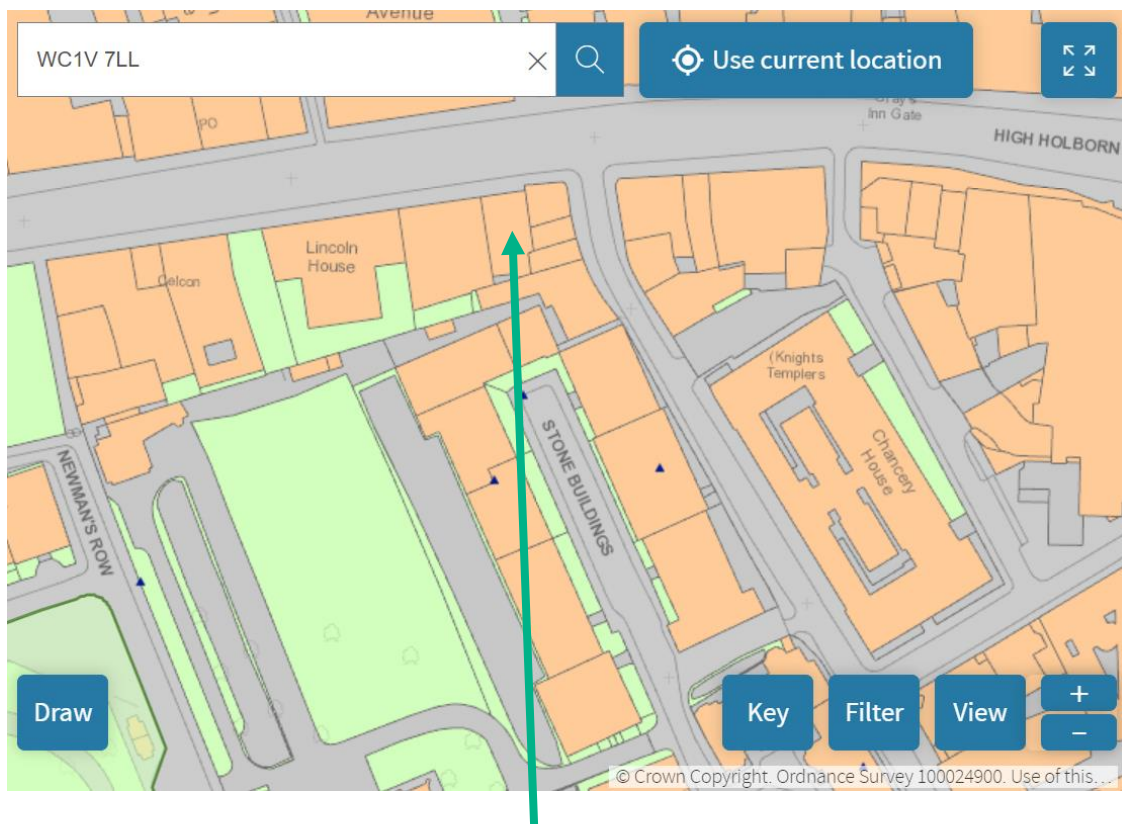
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In terms of listed buildings in the area, these are shown on the map below:



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The above map is taken from the Historic England online search facility. It confirms there are no listed buildings immediately adjacent to the site. The closest are to the south on Stone Buildings.

The location of the site within a conservation area, and close to listed buildings, accounts for the sensitive design of the existing installation on the host building, with equipment set back from the main frontage of the building. This proposal also takes into account the sensitive siting, however the requirement to provide coverage for VMO2 and enhanced services for Vodafone dictates additional and replacement antennas are required. As far as practicable, existing support poles and equipment locations are the same as with the previously approved application.

As previously set out, one antenna is proposed to be located closer to the front elevation of the building. Whilst this would be visible from ground level the level of harm is not considered excessive. Rooftop equipment is already visible along High Holborn, on the host building, on another telecommunications installation to the west along High Holborn, and on other building, including handrailing, for example on the adjacent Lincoln House to the west.

It is accepted that equipment on the roof of the building would be visible from certain viewpoints and have an impact on the host building and surrounding area. However, the impact on heritage assets would be less than substantial, and that this less than substantial harm would be outweighed by the significant benefits of the development, in terms of improved connectivity to this area of Camden for two operators. In addition, a previous approval granted consent for a similar development.

Within the constraints of the host building and surrounding area, it is considered that the development would result in a less than significant harm to heritage assets. Whilst the equipment would be visible from certain viewpoints, these viewpoints would be limited and have been minimised as far as practicable. The minimal level of equipment on the roof of the building, and the careful siting of equipment cabinets, assists in keeping the overall impact of the development to an absolute minimum, and ensures that any harm is outweighed by the significant benefits of the proposal.


The importance of improved connectivity and the significant public benefits of telecommunications proposals has been cited in recent appeal decisions. An example is appeal reference APP/V5570/W/20/3246770 for a rooftop development within the London Borough of Islington. In allowing the appeal the Inspector noted at paragraphs 20, 21, 26 and 27:

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"20. As set out in the National Planning Policy Framework (February 2019) (the Framework), any less than substantial harm to designated heritage assets should be weighed against the public benefits of the proposal.

21. As set out in the Framework, advanced, high quality and reliable communications infrastructure is essential for economic growth and social wellbeing and planning decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. The scheme would support high quality communications and digital connectivity by providing 2G, 3G and 4G connectivity for two different nationwide networks that have a high market share in cumulative terms, as well as the future ability/opportunity to upgrade to 5G services.

26. 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.

27. 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."

When undertaking the balancing exercise for this proposed development it is considered there would be also be 'minor level' of less than substantial harm, and the significant public benefit would outweigh the less than substantial harm.


Photomontages have been produced to illustrate how the equipment would appear if built. Two views have been included, looking east and west along High Holborn. For ease of reference the proposed viewpoints are copied below:

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Viewpoint looking east towards the site




Viewpoint looking west towards the site

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With both viewpoints there would be an increased level of visibility compared to the existing installation, however there would be a significant upgrade in coverage and capacity, and it is noted that it is only the antenna at the front of the building that has not previously been granted consent. The montages also show the existing equipment on other buildings, including the existing telecommunications equipment on the roof to the west of the application site. The overall increase in overall visible equipment levels along High Holborn is considered minimal.

Taking into account the specific technical requirements, with the need to site an antenna at the front of the building to ensure compliance with ICNIRP requirements, the photomontages confirm there would be a less than substantial harm to heritage assets, and in this extremely busy part of Central London, the benefits of improved connectivity would outweigh this less than substantial harm.

It is noted that there has been a previous application which proposed to relocate Vodafone antennas at the front of the building. Application reference 2021/2444/P proposed an upgrade of the Vodafone equipment on the building. This application was refused, however it differed from this current proposal as it proposed two antennas at the front of the building, compared to one with this proposal.

Enhanced connectivity to the area is required for both the Vodafone and VMO2 networks. Whilst there would be a level of harm to the area, it is considered the improved connectivity would outweigh this less than substantial level of harm.

It is considered that the proposed location is the least visually intrusive site and design available to the applicant which also ensures suitable enhanced coverage and capacity can be provided to the area for both VMO2 and Vodafone. It is considered the overall development would not appear excessive. The selected siting is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting technical requirement and avoiding harm to its the setting, both in terms of the impact on visual amenity and heritage assets.


On balance this proposed location is considered to be the optimum location in terms of siting and design, with the limited harm it may impose on the surrounding area being outweighed by the provision of enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact.

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PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2024) (NPPF)

The National Planning Policy Framework came into force in 2012. The guidance has most recently been revised in December 2024. The NPPF sets out the Government's planning policies for England and how these should be applied.

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"*. In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

*"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."*

For **decision-taking** (paragraph 11) this means:

"c) approving development proposals that accord with an up-to-date development plan without delay; or


d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

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- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination."*

Further to this, paragraph 39 states that "Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area."

The proposed development will enable the provision of enhanced mobile communications services to the surrounding area, bringing about substantial public benefit both socially as well as the allowing for certain businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the 'virtual office', thus reducing the need to travel and contributing to the sustainability agenda.

The NPPF directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

*"b) infrastructure for transport, **telecommunications** (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"*

Leading on from this, paragraph 119 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) and full fibre broadband connections".


While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 120 states that "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

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structures for new electronic communications capability (including wireless) should be encouraged".

The proposed site would provide enhanced coverage and capacity for both the VMO2 and Vodafone networks from an rooftop existing installation, therefore the proposal is considered to be in line with the above policy.

It should be noted that paragraph 123 states that "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 terms of heritage assets, section 16 of the guidance deals with 'Conserving and enhancing the historic environment'. Paragraph 202 sets out that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 215 states: *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."* As set out in the preceding section, it is considered there would be a less than substantial harm, and this harm would be outweighed by the significant benefits of the proposal.

The proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 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.

For the purposes of Section 70, the current adopted development plan for Camden Council relevant to the proposal comprises:

- The London Plan: Spatial Development Strategy for Greater London (adopted 2021).
- The Camden Local Plan (2017).

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The London Plan

This revised guidance emphasises the importance of digital infrastructure. Policy SI 6 deals specifically with Digital connectivity infrastructure. The general aim of the policy is for new development to meet demand for connectivity. This is expanded upon in the supporting text for the policy. Paragraph 9.6.1 states: “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.”

The revised guidance is clearly supportive of the proposal and the role that it will perform allowing the VMO2 and Vodafone networks to provide enhanced coverage and capacity to the surrounding area.

Local Plan

There are no policies relating directly to communications development within the development plan documents. General policies of relevance include D1 (Design) which requires a high standard of development, and policy D2 (Heritage). This policy 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.

In terms of design, the proposed development is based on a previously approved scheme (therefore considered appropriate by the Local Planning Authority), with the relocation of one of the antennas, necessary due to ICNIRP requirements, thus keeping the impact of the development to a minimum, as far as practicable. This revised proposal is considered to be a suitable design solution to keep the overall impact of development on the building to a minimum, utilising a building to provide the latest technology to the area for two operators.

As far as heritage assets are concerned the preceding section of this document considered there would be a less than substantial impact on heritage assets, and this impact would be outweighed by the significant benefits of the proposal.


No conflict has been identified with any other Development Plan policies.

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Overall, it is considered the proposal complies with both national and local policy. In terms of national policy, the proposal is sympathetically designed, it would enhance the provision of local community facilities and services and would protect visual amenity and heritage assets. The impact of the development would be outweighed by the significant benefits of the proposal.

Summary

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for an improved quality of service. This development is proposed to provide additional capacity and new 5G coverage to the surrounding area for the VMO2 and Vodafone networks. A simple design solution is proposed to mitigate visual impact and prevent harm to the local environment and to heritage assets.

Confirmation that submitted drawings have been checked for accuracy

Name:	Chris Andrews	Telephone:	
(Agent)			
Company:	Waldon Telecom Ltd		
Company	West Lodge, Station	Email	
Address:	Approach, West	Address:	
	Byfleet, Surrey, KT14		
	6NG		
Signed:		Date:	19 March 2025
Position:	Planning Department	(on behalf of	
		Cornerstone)	

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