

UK BROADBAND

**PLANNING SUPPORTING STATEMENT
IN RESPECT OF
PRIOR APPROVAL APPLICATION
INCORPORATING A FURTHER STATEMENT
ON DESIGN AND ACCESS**

November 2013

arqiva

c/o Needham Haddrell, 8 Hide Market, West St, Bristol, BS2 0BH

Ref: Euston TE, 166657

1.0 INTRODUCTION

1.1 This statement is submitted on behalf of UK Broadband (UKB) in support of the application for a determination as to whether or not prior approval is required in respect of the siting or appearance of additional electronic communications equipment.

1.2 The application is in respect of the rooftop transmission station, Euston Telephone Exchange, 165 Euston Road, London, NW1 2BH. This site is controlled and managed by Arqiva, a radio site management company.

1.3 The development proposed is shown in detail in the drawings submitted. Its principal elements are as follows:

- The installation of a rooftop array of small scale antennas.
- The installation of small scale dish antennas.
- The installation of small scale radio equipment housing at rooftop level.
- The installation of cabling, antenna support poles and associated development.

1.4 The radio equipment housing will need to be mechanically ventilated to avoid overheating of equipment. The ventilation equipment is only likely to operate during the day and the level of emissions is unlikely to exceed background noise levels. If however, you consider specific and further noise attenuation measures to be necessary, we would be pleased to discuss these with you.

1.5 In this statement, which incorporates an additional statement on design and access, we go on to highlight the benefits of the development proposed, to explain the particular need in this case and to demonstrate compliance with planning policy.

2.0 THE PUBLIC BENEFITS

- 2.1 Electronic communications provide vital services that are of great economic and social benefit. A further major benefit is the contribution that such systems make to the attainment of often elusive objectives relating to sustainable development. The considerable public benefits and reliance placed upon fast, secure and reliable networks are such that the last Government carried out a wide ranging review culminating in the Digital Britain Report, published by the Departments of Culture, Media and Sport, and Business, Innovation and Skills in June 2009. This set out a range of recommendations to enhance the UK digital capabilities and the present Government has broadly maintained these.
- 2.2 UKB is a wholly owned subsidiary of PCCW, the largest telecommunications operator in Hong Kong. Since 2003 UKB has been pioneering advanced wireless services and solutions in support of various PCCW interests both in Hong Kong and across the world.
- 2.3 In the UK, UKB is a designated Electronic Communications Code Network Operator and is the largest commercial owner of the national radio spectrum for 4th generation Wireless Technology (4G) mobile services. As a designated Electronic Communications Code Network Operator, UKB operates in accordance with the provisions of the Electronic Communications Code and the Communications Act 2003, which provide the statutory and regulatory basis for the operation of UKB's network.

UK Broadband's Services

- 2.4 UKB provides equipment and wireless services and solutions to the telecommunications industry, service providers, channel partners and the public sector within the U.K. UKB currently provides wireless services across a number of sites using a combination of macro installations on tall buildings and small-scale wireless access points attached to street furniture such as lamp-posts. Most recently UKB has commenced 4G deployments that will provide higher speed secure wireless broadband services in a number of major cities.

4G Digital Cities

- 2.5 UKB is focused on putting 4G capacity into large cities to help with the rapidly growing wireless data demand. A wireless city network must be capable of providing secure services and only 4G over licensed spectrum can offer the high capacity, secure, service guarantee levels needed to solve problems such as digital and social inclusion, mobile working, re-deployable CCTV security, emergency services data communications, community healthcare and education plus 4G to Wi-Fi services on public transport.
- 2.6 UKB's 4G service will provide wholesale wireless data capacity to meet the growing demand of the public sector, businesses and individuals including tourists, making areas where the service is deployed more attractive to these target groups. Our high quality wireless infrastructure will complement existing fixed line infrastructures to offer truly pervasive and flexible data access that will deliver economic benefits for all.
- 2.7 UKB has commenced the early stages of building the UK's first 4G (IMT Advanced) service in London. Phase one was operational for the London 2012 Olympics. UKB will extend its 4G service by adding the UK's other major cities to its building plans at an appropriate time.

4G Universal Broadband

- 2.8 UKB is committed to supporting Government objectives to ensure that everyone in the country can get fast broadband access. UKB's substantial licensed spectrum holdings and its 4G technology solutions are specifically designed to solve rural broadband and other "not spot" needs, thereby providing services to meet the Governments Universal Service Commitment and its wider super-fast ambitions.
- 2.9 UKB's fast wireless access and back haul solutions operate in licensed spectrum and are particularly beneficial where fixed fibre connections are too costly or would take too long to deploy. These solutions are highly scalable, cost-effective and are built to a common specification across the country. The demand for

secure, reliable and high capacity network services, especially mobile (in other words wireless) broadband, continues to grow at an exponential rate. With the increasing popularity of smart phones, tablets, games consoles and other devices that use the internet as a backbone, the demand for high speed wireless networks is growing at a considerable rate. The Digital Britain Report clearly seeks to encourage the deployment of next generation 4G mobile broadband networks and it is this type of network that UKB is looking to develop to provide high speed wireless connectivity, initially in the London area.

2.10 This new network will provide a range of public benefits, including:

- **Mobile and flexible working** providing a faster, more reliable extension to existing corporate and municipal networks
- **Wireless home access** can extend existing safe school, office and campus networks seamlessly across the community and into student and workers homes
- **Diverse connectivity** provides a cost-effective wireless backup for essential connectivity supporting day-to-day operations and civil contingency planning objectives
- **Non-spot solutions** enabling the geographically excluded to access the Internet
- **Vehicular connectivity** wirelessly connects vehicles to existing networks enabling applications such as mobile CCTV and operational worker mobility
- **Low cost CCTV** connectivity which shares parts of the network to reduce overall costs
- **Passenger Wi-Fi** which shares parts of the network to reduce overall costs

- **Wi-Fi zone connectivity** a cost effective, reliable, high capacity replacement for existing copper or unlicensed mesh connectivity supporting existing municipal wireless investments.

3.0 THE OPERATOR'S REQUIREMENT

- 3.1 The UKB 4G network uses cellular technology. Annex B of the Code of Best Practice explains how cellular networks operate. In the network rollout information supplied (February 2011), the operator will have explained its anticipated network requirements and the anticipated use of existing sites, including those owned by radio site management companies like Arqiva.
- 3.2 Consistent with the obligation on all electronic communications code systems operators and planning policy at all levels, UKB is basing its network on existing electronic communications installations or other suitable structures. Arqiva is an electronic communications operator and a radio site management company. Sharing on our sites accords with this cornerstone policy which exists to minimise the number of radio and electronic communications masts, and other sites for such installations.
- 3.3 The enclosed coverage plot illustrates the geographical area that will be served by the new 4G network from the application site, to the potential benefit of local businesses and residents.
- 3.4 In addition to the three small antennas required for cell coverage, there is a requirement for two small scale (0.3m Ø) transmission dishes and one small scale (0.15m Ø) receive dish. These dishes require direct line of sight with dishes on corresponding installations in the wider area. They are necessary to provide relay links for other installations and ultimately to link this and other sites with the nearest Switching Centre. The controlling equipment cabinets are one of the smallest external cabinets available at a size of 0.6m (w) x 0.48m (d) x 1.4m (h) and are intended to sit on a freestanding plinth on the roof deck.

4.0 COMPLIANCE WITH PLANNING POLICY
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4.1 The relevant planning policy framework that has been taken into account and in part already alluded to is found principally within:

- Documents within the Local Development Framework
- National Planning Policy Framework (NPPF)
- The Code of Best Practice on Mobile Phone Network Development

4.2 Although not a planning policy document, the Digital Britain Report referred to above and the clear encouragement given to the deployment of next generation 4G networks is also an important material planning consideration.

The General Policy Background

4.3 The general policy background can be summarised as follows:

- Government policy is to facilitate the growth of new and existing electronic communications systems, with clear and recent emphasis on next generation 4G networks
- Government policy is to keep the inevitable environmental impact associated with telecommunications development to the minimum
- The key way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites
- The starting point for planning new networks or the expansion of existing networks is therefore to use existing telecommunications sites owned by other operators or radio site management companies, such as Arqiva

- The emphasis on minimising environmental impact is greater according to the sensitivity of the site. The emphasis on exploring and utilising site sharing opportunities is consequently higher in these circumstances

4.4 A fuller review of the relevant policy framework is however set out below.

The Digital Britain Report

4.5 The Digital Britain Report provides especial context in respect of important socio-economic factors. It sets out clearly that a key objective of Central Government is to facilitate the growth of new communications, such as wireless Broadband technology, due to its importance in providing fast, reliable and cost effective services that can support the economy and help to meet sustainable development objectives.

4.6 The Government is also keen to ensure that people and organisations have a choice as to who provides their telecommunications service, a wider range of services from which to choose and equitable access to the latest technologies as they become available.

4.7 The Digital Britain Report restates the Government's ambition to secure the UK's position as one of the World's leading digital knowledge economies and sets out a number of objectives to secure this vision. Paragraph 18 of the Executive Summary of the report states that:

"18. We are at a tipping point in relation to the online world. It is moving from conferring advantage on those who are in it to conferring active disadvantage on those who are without, whether in children's homework, access to keep up with their peers, to offers and discounts, lower utility bills, access to information and access to public services. Despite that increasing disadvantage there are several obstacles facing those that are off-line: availability, affordability, capability and relevance."

4.8 In order to overcome these obstacles, the report sets out the following key objectives that are directly relevant to the provision of wireless services:

- A Universal Service Commitment to ensure that all can access and benefit from broadband. This will be delivered by a mix of technologies: DSL, fibre to a street cabinet, wireless and possibly satellite infill broadband.
- Support for the provision and rollout of next generation broadband infrastructure and services through 4G networks.
- To ensure that the delivery of public services in the UK keeps pace with users' expectations and is smart in its delivery of ICT systems. In relation to education and skills, paragraphs 63 and 64 of the Executive Summary state that:

“63. Ensuring the healthy pipeline of talent starts in the education system, from primary school right through to Higher Education. The Department for Children, Schools and Families’ Children’s Plan aims to make this country the best place in the world for children and young people to grow up. The Digital Britain report highlights many ways in which the digital agenda can help to realise better outcomes for children and young people, including through the Home Access Programme, by ensuring parents have the digital skills and confidence to support their child’s safe, effective and balanced use of the Internet, by ensuring good quality, plural and relevant multi platform content for children and young people and by giving our children and young people the skills to make the most of new technology.

64 At primary level, the Government endorses the Rose Review of the curriculum which upgrades digital (ICT) competence to a core competence alongside English, mathematics and personal development. We are also piloting a new creative entitlement of five hours a week delivered by professionals in the creative and cultural sector. At secondary level the Government is rolling out a major programme of

reforms to the 14-19 curriculum including an emphasis on applying digital knowledge real life contexts. New GCSEs in English, Maths and Information and Communications Technology, incorporating functional skills will come on stream from next year. The new Diplomas for 14-19 year olds in IT and Creative and Media will help swell the numbers of those entering the professional digital workforce with the desired mix of practical and transferable skills, industry knowledge and business awareness.”

- 4.9 The achievement of these objectives will, of course, only be realised by the provision of the relevant broadband infrastructure such as that proposed in this planning application. The full copy of the Digital Britain Report is at: http://www.culture.gov.uk/what_we_do/broadcasting/6216.aspx

National Policy

- 4.10 The National Planning Policy Framework (NPPF), which came into effect on 27th March 2012, provides the overarching policy guidance. At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 4.11 There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles: -
- **An economic role** – *Contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*
 - **A social role** – *supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with*

accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- ***An environmental role*** – *contributing to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy*

4.12 The development proposed accords with these key policy objectives, in particular the positive contribution that such systems make to society as outlined in section 2 above.

4.13 The NPPF specifically goes further with regard to electronic communications and promotes - *“Advanced, high quality communications infrastructure as being essential for sustainable growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services”*

4.14 In respect of NPPF guidance on the deployment of electronic communications apparatus in context of the current proposal the following is relevant: -

- Pre-application consultation has been undertaken in accordance with the first bullet point at paragraph 45.
- The operator proposes to site its apparatus at an existing electronic communications facility managed by Arqiva, a radio site management company, in accordance with the guidance at paragraph 43 and the third bullet point of paragraph 45.
- The application will include a signed certificate confirming that the installation would conform to ICNIRP Public Exposure Guidelines as required by the second bullet of paragraphs 45. The certificate of ICNIRP compliance will be issued to the Authority under separate cover.

- The operator proposes to deploy small scale apparatus, designed to help minimise potential visual impact as encouraged through the wider principles of the NPPF.
- 4.15 The proposed development therefore accords with the thrust of the NPPF and should be acceptable in principle, the detail being subject to compliance with the site specific policy framework and other relevant material considerations.
- 4.16 The NPPF now sets out national policy guidance applicable to conservations areas with regard to conserving and enhancing the historic environment.
- 4.17 The NPPF emphasises that one of the main objectives is to conserve England's heritage assets in a manner appropriate to their significance. The Conservation Area is widely drawn but the host building, which is not listed, is not of any particular merit either individually or part of the group fronting Euston Road. As electronic communications must be provided in this city location, the choice of site is therefore a good one. Likewise the use of small scale apparatus should ensure the preservation of the character and appearance of the conservation area.
- 4.18 The development proposed accords with these key policy objectives, which are reflected in the relevant policies at local level and so should be acceptable in principle, the detail being subject to compliance with the site specific policy framework and the other considerations relating to siting and design.
- 4.19 The benefit and role of modern communications networks in achieving sustainable development objectives is emphasised in paragraphs 33 of PPG13 in the following terms:

“The introduction of new information and communications technology (ICT) is enabling rapid changes to be made in the size, specification and location of development, particularly in the service sector and the knowledge based economy. Although the effects of ICT are difficult to predict, it is creating opportunities to reduce the need to travel. ICT is facilitating increased flexibility in working patterns, including more home working, which has the

potential to reduce daily commuting to work and enable some journeys to take place outside of the peak periods.....”

Local Policy

- 4.20 The replacement of the spatial development strategy for London – known as the London Plan was published, and came into effect, on 22nd July 2011.
- 4.21 The 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. More specifically, UK Broadband’s proposed development is entirely consistent with, and will help to implement, the following aims and objectives of Policy 4.11 Encouraging a Connected Economy, which states that:

“ Strategic

The Mayor will and GLA Group will, and all other strategic agencies should:

a. facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure adequate and suitable network connectivity across London (including well designed and located street-based apparatus), data centre capability, suitable electrical power supplies and security and resilience, and affordable, competitive broadband access meeting the needs of enterprise and individuals.

b. support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits.”

Site Specific Policies and the Re-Designed Scheme

- 4.22 The host building is included within the Bloomsbury Conservation area, more or less at the north western extremity of the conservation area. The Development Plan policies require special regard be given to the desirability of preserving or enhancing the character of the area. The review below and in the next section should demonstrate compliance with this policy objective.
- 4.23 With regard to the extant Development Plan policy, pursuant to Section 38(6) of the Planning and Compulsory Purchase Act 2004, the relevant policies are contained within the London Borough of Camden Local Development Framework, November 2010, Core Strategy and Local Development Framework Development Policies.
- 4.24 The existing Euston Telephone Exchange building is one that lines the major east-west thoroughfare that is a wide, heavily-trafficked A-road, consisting of a dual carriageway with broad pavements and mature street trees. The telephone exchange houses both a commercial and an established electronic communications use. The building itself is of four storey red brick construction under a mansard roof, which is punctuated by small attic windows of the fifth floor that align with the openings below, with rooftop safety hand-railing and plant rooms which though attractive, and helping to form the principal frontage to Euston Road, holds little intrinsic architectural or historic merit and it does not specifically contribute to the character or appearance of the area; contrasts to say the nearby Wellcome Institute, the Greek Revival church of St Pancras or the Friends Meeting House. The facility already accommodates the radio station for the mobile phone operator O2, who operate from the site with 6 antennas attached to the tallest element of the building, the north eastern plant room. The rooftop of the telephone exchange provides an essential site sharing facility in the area for electronic communications operators and we therefore believe the installation of additional small scale apparatus for a further operator results in a wholly sustainable solution to meet their coverage requirement.

- 4.25 Core Strategy policies CS5 Managing the impact of growth and development and CS14 Promoting high quality places and conserving our heritage are specific to the subject development and following the adoption of the LDF, we note that former UDP policy B5 no longer applies and that as such there is no specific policy relating to telecommunications development. However, this said, we note that guidance is afforded by the following development policies and guidance:- DP24 securing high quality design, DP25 conserving Camden's heritage, DP26 managing the impact of development on occupiers and neighbours, Camden Planning Guidance CPG1 design and CPG6 amenity, and Bloomsbury Conservation Area Appraisal and Management Strategy.
- 4.26 In the re-design of the proposed development, the applicant has tried its utmost to balance the technical requirements of the site against the specific local policies and earlier concerns expressed by the Authority's conservation officer to the original application made in April 2013 (2103/3207/P) with regard to ensuring the protection of the "long views" along Euston Road.
- 4.27 As such, in abiding with the principles of urban design, particular and careful attention has been paid to the definition and scale of development in that the smallest panel antennas and dishes have been utilized whilst one of the smallest equipment cabinets available of 0.6m x 0.48m x 1.4m has specifically been chosen to ensure that the proposal does not dominate the existing building and preserves the character and appearance of the area (DP24, DP25, DP26 and CS14).
- 4.28 Particular care has been taken in the specific siting of the equipment in that the antennas, dishes and cabinets are to be located on the roof of the property keeping them as low as practically and technically possible in height, and as tight to the roof deck as possible to ensure the protection of the long views. Consequently the re-design has ensured that the additional electronic communications equipment is sited in and around, but crucially not above, the existing rooftop infrastructure and plant rooms.

- 4.29 In this instance, the antenna facing due south and Endsleigh Street, B1, has now been lowered to ensure that it does not protrude above the existing plant room and further shall be coloured to blend into the plant room. The remaining antennas fronting Euston Road have been re-designed in rooftop position so as to completely minimize the “long distance” views where concern was previously raised. In this regard, antennas A1 and C1, have now been lowered so as to be as tight to the roof deck as possible in order that they blend with the existing rooftop safety hand-railing, trying not to protrude above the hand rail level and therefore attempting to visually become a vertical element of that safety hand-railing. Furthermore, as the rooftop photograph shows in 5.9 below, antennas A1 and C1 will also now be lower than the central plant room roof to ensure absolute protection of the “long views”.
- 4.30 With the height of the building combined with the wide thoroughfare and mature street trees, the visual impact of the re-designed scheme when viewed against the backdrop of existing development and existing infrastructure (safety hand-railing) will be negligible from public vantage points at street level and will not compromise the integrity of the conservation area designation. Many views of the installation from other tall buildings in the vicinity will be interrupted by intervening structures. We therefore believe that the overall visual impact of the re-designed new apparatus will negligible and in most instances will go unnoticed altogether, thereby minimizing any adverse affect on the character of the building by ensuring that there is no extension in height and that through re-design the Authority has crucially now obtained a high quality design (in DP24, DP25 and DP26 terms). Furthermore and critically, the re-designed scheme protects the longer public views up and down Euston Road and consequently will additionally preserve, and not have any visible adverse affect on, the conservation area’s character or appearance (in CS14 and DP25 terms).
- 4.31 The proposal will meet the technological needs for the district and Camden’s population in providing high-speed broadband wireless data facilities and is consequently fully compliant with both CS1 and CS5.

Summary

- 4.32 In summary, the development proposed is in accordance with all relevant national and local policies, including those that apply specifically and generally. In addition, the development has been properly brought forward in a consultative fashion as advised as a matter of policy and best practice. The location of the proposed apparatus will have no effect on amenity in terms of visual impact, noise, traffic, vibration or fumes and as such the proposals will not compromise the wider policy objectives relating to the protection of amenity.
- 4.33 Consequently the siting and appearance of this re-designed scheme for additional electronic communications apparatus at the host building can be commended to the Authority for approval.

5.0 FURTHER STATEMENT ON DESIGN AND ACCESS

5.1 The subject application is in respect of a determination as to whether the prior approval of the Authority is required to the siting and appearance of the development. As such the proposal is exempt from the requirement to provide a design and access statement. Nonetheless, in the interests of best practice and to assist your determination, this section provides a description of the process adopted in the design of the proposals and explains the access considerations. The significant contribution such developments makes towards sustainable development objectives has already been outlined earlier.

A Consultative Approach

5.2 The NPPF and the Code clearly require a consultative approach and a process to reflect the sensitivities of any given site.

5.3 As you will recall, the applicant originally made an application for permission in April 2013 for the installation of electronic communications apparatus at this host property. Though we understand there were no objections to that original scheme, the Authority's conservation officer had concerns over the "long views" up and down Euston Road and so the application was withdrawn in an attempt to secure a higher quality and acceptable design.

5.4 As you will be aware, our prior consultation scheme dated 1st November 2013 has therefore preceded this application. In that correspondence we explained the methodology and reasoning to the re-designed scheme and further enhanced this with the subsequent provision, on 11th November, of photomontages. We have not received any comments from the Authority to this prior consultation.

5.5 Consequently in the absence of a reply to the prior application correspondence, we have assumed that the Authority is more content with the re-designed scheme, given that it is now a low impact and high quality design which has given careful and considerate thought to the siting and appearance of the development. Furthermore the form of development meets both local and national planning guidance, is situated on a building that already houses

electronic communications apparatus which consequently should not be an unacceptable form of development and can thus be commended to the Authority for approval.

- 5.6 In addition, we confirm that all due notifications under the Electronic Communications Code (Conditions and Restrictions) Regulations 2003 (the Code Regulations) have been made.

Site Selection Considerations

- 5.7 As indicated above, UKB is basing its network on existing electronic communications installations or other suitable structures. This approach is the appropriate starting point in looking for a site, both as a matter of policy and as a statutory requirement under the Code Regulations. In view of this and because an acceptable form of development is possible, the subject site was selected and the prior consultation was carried out accordingly. No other sites were identified during the prior consultation process confirming the findings of this exercise and underlining the difficulty of finding sites that strike an appropriate balance between environmental and operational considerations.

- 5.8 In any event, the NPPF advises that it is only where a new mast or base station is proposed that a local authority may reasonably expect to see evidence that the operator has explored the possibility of erecting antennas on an existing mast, building or other structure. As the proposal does not entail a new mast or a new site for electronic communications, it therefore conforms to the advice on sharing existing structures and so the issue of alternative sites is not a relevant factor in this case. As the proposed installation will not be a significant addition to the host structure it will not bring about any unacceptable visual impact and so should be acceptable.

The Site

5.9 The host building is situated on Euston Road and is opposite Euston Square Gardens which is located towards the north western perimeter of the Bloomsbury Conservation Area. The building as such forms part of a terrace of buildings between 161 – 167 Euston Road and as such there are existing buildings attached to the north east and south west boundaries of the host building whilst Euston Road and Endsleigh Gardens form the frontages to the north and south of the building.

The building itself comprises ground, first, second, third and fourth floor levels with a fifth floor provided by mansard roof arrangement, with that mansard being punctuated by small attic window which align with the openings below, with rooftop plant rooms and rooftop safety hand-railing above, which are generally used as a telephone exchange with rooftop electronic communications.

Euston TE location





Euston Road – looking north east above and looking south west below





Euston Telephone Exchange – existing rooftop photos



Physical Context

- 5.10 The physical context of the development is an existing building that houses rooftop electronic communications apparatus within a dense urban area interspersed with public gardens. Many of the surrounding buildings host a variety of plant and machinery and associated structures, including electronic communications apparatus. The addition of the small scale apparatus required by UKB will be appropriate within this context.

Amount, Layout and Scale

- 5.11 As regards amount, layout and scale, this has been guided by the special technical and operational requirements of the operator's system having proper regard to minimising appearance in accordance with policy and best practice. The amount, layout and scale of the development proposed by UKB have been guided by the following factors:

- The overriding technical objective of deploying a resilient and secure 4G network with coverage over the wider area, as explained in the preceding section.
- Co-locational requirements to ensure that it is compatible with and designed around the existing installations. The extra support apparatus has been specifically sited and designed taking into account environmental as well as operational factors.
- The desirability of minimising potential visual impact on the appearance of the host building, the character of the Bloomsbury Conservation Area, street scene and the amenities enjoyed by local residents.

- 5.12 Two of the new antennas, A1 and C1, are proposed to be located on a new roof mounted tripod support directly adjacent to the safety hand railing fronting the Euston Road elevation of the host building. This support tripod shall be galvanised steel so as to match the hand railing and the grey antenna units, though fractionally wider than the safety hand railing, shall resemble additional

vertical elements of the safety hand railing. In order to achieve radio coverage along Euston Road and maintain ICNIRP compliance, both of these antennas need to remain central to the building. Critically however the antennas shall be as tight to the roof deck as possible in order to ensure that they do not protrude above the safety handrail.

- 5.13 The remaining antenna, B1, is to be fixed 'on a new climbable EMA' – elevation mounted antenna – to the southern plant room façade directly facing Endsleigh Street. This antenna and support pole shall be lower than the plant room roof so that they do not penetrate the skyline and will further be coloured to match the plant room.
- 5.14 The two small scale equipment cabinets, of 0.6m x 0.48m x 1.4m (h), are to be sited on the roof below the south west plant room.
- 5.15 Many views of the installation from other tall buildings in the vicinity will be interrupted by intervening structures. We therefore believe that the overall visual impact of the new apparatus will be marginal at worst and in most instances it is likely to go unnoticed altogether; thereby minimizing any adverse affect on the character of the building and will not be visually intrusive or unsightly when seen in longer public views and consequently should preserve and not have any visible adverse affect on the Conservation Area's character or appearance
- 5.16 The antennas and dishes will be viewed against the backdrop of the existing development and we do not believe will increase the prominence of the rooftop transmitting site from any public vantage point either within or outside the Bloomsbury Conservation Area. Consequently the proposed development should preserve the integrity of the Conservation Area designation and protect the "long views" along Euston Road.

Landscaping

- 5.17 Landscaping would be inappropriate in the context of the development proposed.

Access

- 5.18 The access to the site is to remain unaltered from the existing access that runs through the service areas of the telephone exchange. Maintenance access to UKB's equipment will use these existing access routes to the site. No alterations are required to these access routes in order to accommodate the development. Other than emergencies such as a fault or operational failure, there will be one or two maintenance visits to service the equipment per annum, typically by a single engineer.
- 5.19 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. The proposal does not therefore give rise to any public issues associated with access and so there is no requirement to incorporate any inclusive access arrangements into the design and layout of the development.

6.0 ICNIRP COMPLIANCE

- 6.1 A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure will be supplied under separate cover to this application. Accordingly, as explained within the NPPF, it will not be necessary to consider further the health aspects and concerns about them, which include the perception of risk.

7.0 SUMMARY AND CONCLUSIONS

7.1 In summary, the application is in respect of electronic communications apparatus required as part of a new 4G network, being deployed by UKB, consistent with Government objectives.

7.2 The network will provide fast, reliable and secure wireless connectivity over the local area. The network will therefore help meet the vast and growing demand for high speed wireless Internet connections that are essential for smart phones, tablets, games consoles and a whole host of other existing and emerging devices.

7.3 The network will therefore help bring about significant economic, social and sustainable benefits in the public interest and in principle, is encouraged at all policy levels, most recently through the Digital Britain Report.

7.4 UKB has followed national and local planning policy and best practice guidance in the siting and design of its apparatus. This has included:

- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Arqiva.
- Consultation in accordance with the Code of Best Practice procedures.
- The use of small scale equipment together with careful siting to help minimise potential visual impact.

7.5 The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore any need to consider health effects and related concerns such as the perception of risk further.

7.6 This statement has demonstrated that the proposal is in accordance with the existing and emerging local policy and national policy. In particular it is a form of development that is specifically encouraged as a matter of principle and in its

detail complies with the policy objective of minimising potential environmental impact.

- 7.7 In conclusion, the application merits support and there are no material considerations that indicate otherwise.