



**Design, Access and Supporting Statement for
Development at Rooftop of: New House, 67-68 Hatton Garden,
Holborn, London EC1N 8JY.**

Prepared by:

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1. Introduction

- 1.1. This statement forms part of the re-submission of previously refused application for full planning permission reference 2013/2162/P on behalf of UK Broadband Ltd (UKB), to install the following electronic communications apparatus at New House, 67-68 Hatton Garden:

It is proposed to install: 3no. small antennas supported by 2 no. freestanding support-frames; 2 no. small (300mm) dish antennas; 1 no. required equipment unit located upon a new non-penetrative steel support frame, plus ancillary works.

- 1.2. The purpose of the document is two-fold:

- To explain the details and aims of the proposed development
- To demonstrate that the issues which led to the refusal of the original application have been remedied or sufficiently mitigated
- To demonstrate that the development is in accordance with local and national planning policies.

- 1.3. It incorporates a 'Design and Access Statement', as required by Section 8 of the Town and Country Planning (Development Management Procedure) Order 2010.

2. UK Broadband: Background Information

Overview

- 2.1. UKB is a wholly owned subsidiary of PCCW, the largest telecommunications operator in Hong Kong. Since 2003 UKB has pioneered advanced wireless services and solutions in support of various PCCW interests both in Hong Kong and across the world.
- 2.2. In the UK, UKB Limited 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) 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 Network

- 2.1. The UKB Group provides 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 from 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 and CCTV poles.
- 2.2. UKB is currently focused on providing 4G network deployment in London and other major cities in the UK to help with the rapidly growing wireless data demand. The proposed 4G network will provide the ability to deploy multiple 20 MHz channels, within UKB's licensed 3400-3800 MHz spectrum, that UKB considers to be the underlying requirement for capacity in 4G wholesale networks.
- 2.4. UKB's 4G service is based on a network of radio base stations, which have to be situated in relatively high locations such a tall buildings located close to the customer. These base stations typically consist of a set of antennas and one or more small equipment cabinets, which are connected to the wider network by transmission dishes or fibre-optic cables.
- 2.5. When selecting base station sites, UKB makes use of existing telecommunications sites, buildings and structures wherever this will achieve network coverage requirements.

Who will benefit

- 2.6. The proposed 4G network will offer high capacity, secure, wireless, service guarantee levels needed to support initiatives including digital and social inclusion, mobile working, re-deployable CCTV security, emergency services data communications, community healthcare provision, education, and 4G to Wi-Fi services on public transport.
- 2.7. UKB is also supportive of the government's Digital Britain initiative to ensure that everyone in the county has access to affordable broadband services. UKB's substantial licensed spectrum holdings and 4G wireless solutions are specifically designed to solve 'not-spot' needs and thereby help to achieve the Governments Universal Service Commitment and super-fast broadband objectives.

3. The Proposed Development – (Re Submission of Refused Proposal ref: 2013/2162/P)

- 3.1. In this case, the proposed development at New House, 67-68 Hatton Garden is required to introduce 4G coverage to an area of London within which it is essential that the latest technological advancements are available. The coverage plots provided with this application illustrate the number of important commercial structures that can be facilitated from this key site, in addition to local residences, providing a high-quality level of coverage to an area of London in which this technology will be in greatest demand.
- 3.2. In order to provide coverage to this area, it is proposed to install the following electronic communications apparatus:

*It is proposed to install: 3no. small antennas supported by 2 no. freestanding support-frames; 2 no. small (300mm) dish antennas; 1 no. required equipment unit (measuring 700*700*1600mm) located upon a new non-penetrative steel support frame.*

The equipment of UK broadband is substantially more lightweight than that routinely used by mobile telecoms operators and will not impact markedly upon views of a rooftop which is already home to the equipment of one mobile operator. The sharing of the existing rooftop site removes the need for a new installation elsewhere in the cell, thereby conforming to the principles of good telecoms development as laid out in relevant local and national planning policies.

The lightweight antennas are to be set back from the parapet edge, which will reduce to an absolute minimum the visual impact of the proposal upon the skyline and in terms of long range vistas from vantage points in the locality. The 2 no. proposed dishes are to be 300mm in diameter each, and so will have negligible visual impact.

Please see planning drawings reference: CAM0023 100-103 Rev C

3.2 LPA Consultation

Following the refusal of application reference 2013/2162/P, the LPA case officer entered into lengthy discussions with the agent with a view toward the generation of a mutually acceptable design for the site. The particulars of the LPA consultation are detailed below:

a) *An alternative location for the development:*

The LPA suggested that an alternative location for the development would be more suitable, with the adjacent existing telecoms site at 63-66 Hatton Garden being suggested. On June 21st, 2013, the agent provided the following response:

"As detailed in the supporting documentation for application 2013/2162/P, the search areas for the provision of 4G frequencies are geographically constrained. The area requiring coverage (central Hatton Garden and environs) is home to two existing telecoms sites: the site of the refused proposal, and the Vodafone site located immediately to the north, at 63-66 Hatton Garden.

It is considered better in planning terms to share an existing site than to establish an entirely new base station in the area. This view is in line with the NPPF and local telecoms planning policies.

As detailed in the documents supporting refused application reference 2013/2162/P, New House is considered superior to 63-66 Hatton Garden for the following reasons:

Option G: 63-66 Hatton Garden

This existing telecoms site is located immediately north of New House and is comparable in planning terms to the selected option. New House is slightly taller and closer to the area requiring coverage. Furthermore, the plant-room upon New House would obstruct the provision of coverage southward from 63-66 Hatton Gardens, meaning that New House is the better option from a technical point-of-view.

We therefore are of the view that New House is the most suitable location for the installation within the physically constrained search area.”

The LPA did not question this logic and so discussions began on measures to be taken to mitigate the visual impact of the proposal, as detailed in the following section.

3.3 Measures Taken to Mitigate the Visual Impact of the Proposal Following LPA Consultation

Application 2013/2162/P was refused for the following reason:

“The proposed antennae, dishes, support frames, cabinet and associated equipment, by reason of their height, location and design, would be harmful to the appearance of the host building, the roofscape character of the neighbouring properties and the character and appearance of the Hatton Square Conservation Area...”

With the case officer’s report stating:

The application site towers above the adjoining four-storey end-of-terrace building to the immediate south on Hatton Garden, meaning the side and rear elevations of the building are highly visible from both Hatton Garden and Hatton Wall. Despite the applicant’s argument that the antennae and supporting poles have been set back from both front and side elevations to reduce their visual impact, at approximately 3.3m high they would be visually prominent when seen from longer views to the south on Hatton Garden, as well as to the east on Hatton Wall. The proposed railings would add further visual clutter at roof level, contrary to policies DP24 and DP25, and the aims of CPG1 on Design.

The case officer noted that while the building is already host to a visually harmful mobile telecoms installation upon the plant-room roof, that this application was approved before the adoption of the Hatton Garden Conservation Area Appraisal, and that subsequent applications had been refused for the site; and went on to state that:

In this context, it is considered that the proposed antennae, supporting frames, cabinet and associated equipment, due to their height, location and design, would result in further visual harm to the appearance of this positive contributor, as well as failing to preserve or enhance the character or appearance of the wider Hatton Garden Conservation Area. It is therefore considered unacceptable on design grounds.

In light of the above, the agent proposed two possible alterations to the design: a) to reduce the antennas in height by as much as possible while still providing adequate signal coverage, or b) to camouflage the antennas within a mock air vent or similar design.

The case officer responded on July 12th, stating:

In terms of the mitigating measures put forward, option 1 (to lower the height of the antenna by 1 metre) may be considered favourably; however it is considered that it would be better for the antenna to be sited closer to the roof-top plant room/extension (i.e. further set back from both Hatton Garden and Hatton Wall elevations), or for the antennae to be incorporated within existing roof-top level equipment (either on New House, or the adjoining property at 63-66 Hatton Garden). Should you make a further application based on a lowered height, I would strongly advise submitting proposed visuals showing sight lines from Hatton Garden and Hatton Row, giving an indication of how visibility would be reduced.

It is worth noting that:

a) the agent then advised the case officer that there is a trade-off between antenna heights and antenna location vis-à-vis the building roofline, to the extent that antenna heights must be increased the further back from the building's edge they are located; this is due to a phenomenon known as 'clipping' whereby the signal bounces off the roof surface, corrupting it.

and b)

regarding the integration of the proposal into the existing mobile operator equipment on the plant room roof, it was explained that all 6 antenna positions on the existing (Telefonica UK) stub tower were occupied, meaning that the stub would need to be re-built, either wider or taller, in order for it to be shared with UKB's equipment. This would unquestionably have undesirable visual impact upon the building and the conservation area far in excess of the proposal the subject of this application.

The case officer acknowledged the above points and then indicated that a lowering of antenna heights at their currently proposed locations would consequently merit the re-submission of an application.

4. Other Pre-application Consultation

Pre-application packages including plans of the proposal were issued on 26.03.13 to:

Cllr Fulbrook
Cllr Olad
Cllr Vincent
St Albans Primary School
Camden Borough Council

At the time of writing, no responses had been received by the agent.

5. Design, Layout, Access and Visibility Considerations

Physical Context

- 5.1. The proposed installation is to be sited upon the roof of New House, 67-68 Hatton Garden, an 8 story early 20th century commercial structure which forms part of the Hatton Garden Conservation Area.

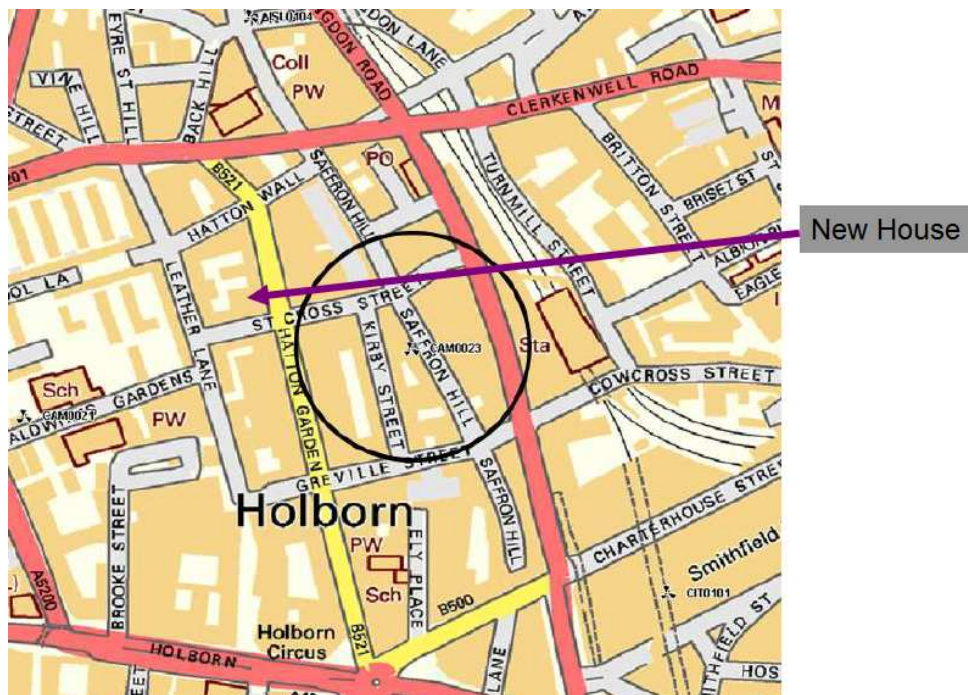


Fig 1. The Directed Search Area and the chosen site.

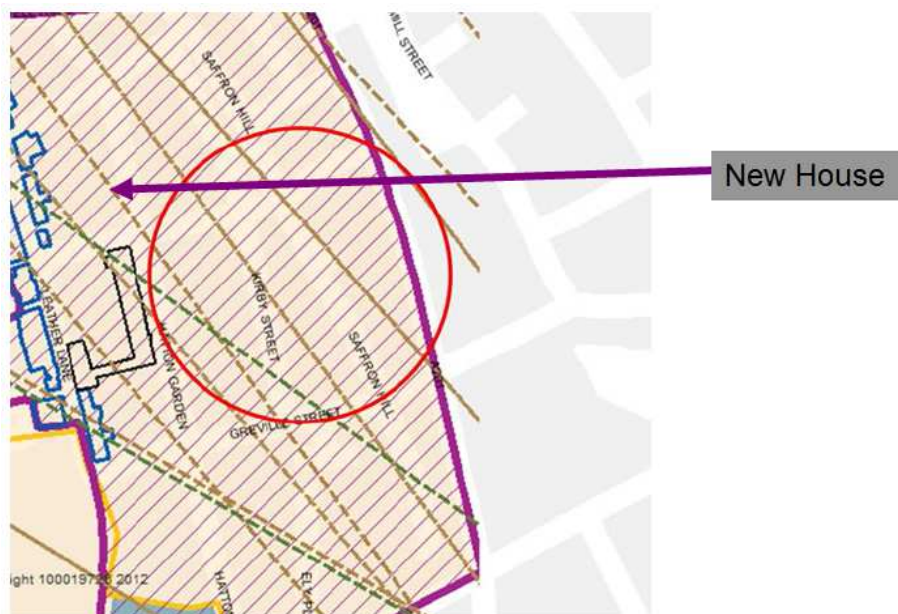


Fig 2. Camden Conservation Areas

New House is an existing telecoms site providing coverage to the Holborn area and currently accommodates the antenna system of a single operator.

The equipment of UK broadband is substantially more lightweight than that routinely used by mobile telecoms operators and will not impact markedly upon views of a rooftop which is already home to a substantial roof installation. The sharing of the site removes the need for a new installation elsewhere in the cell, thereby conforming to the principles of good telecoms development as laid out in relevant local and national planning policies.

The Appearance, Layout, Scale and Amount of Development

5.2. The location, scale and amount of development proposed by UKB are dictated by the following factors:

- The overriding technical objective of remedying the current deficiencies in UKB's 4G network coverage.
- The factors affecting UKB's search for a suitable location for the development which have resulted in the selection of the application site
- The need to minimise the visual impact of development, and avoid any detrimental impact on the character of the streetscene or the amenities enjoyed by local residents, having regard technical and operational requirements

5.3. The principal technical constraint affecting the siting of the proposed base station is that it needs to be developed in a location that can provide as much network coverage as possible having regard to other relevant constraints such as land use planning designations, amenity considerations and landownership policies.

5.5. In this case, it is proposed to install the following apparatus in order achieve 4G network coverage objectives:

- 3 no. antennas to provide coverage to this sector of Holborn. (2 no antennas to be installed on a free-standing support frame toward the north-eastern corner of the roof; 1 no. antenna to be installed on a similar frame to be located in the south-western corner)
- 2 no 300m diameter transmission dishes to link the site into UKB's wider network. (To be attached to the antenna support poles)
- 1 no. equipment cabinet (*measuring 700*700*1600mm*) containing the electronic communications equipment and power required to operate the base station

5.6. For the avoidance of doubt, the scale and amount of development proposed by UKB is the minimum required to provide '4G' coverage from this site. The omission of any one of these components would either render the base station inoperable (in the case of the equipment cabinet) or would significantly reduce the coverage provided from the site (fewer antennas) to the extent that UKB would need to develop a further base station in the area to meet the coverage objectives. This would be inconsistent with government policy, as set out in the NPPF, which seeks to keep the numbers of base station sites to the minimum consistent with UKB's network requirements.

Following consultation with the LPA, the antenna heights have been reduced to their minimum consistent with the adequate provision of coverage to the local area from the site. For confirmation, antenna pole 'C1' has been reduced by 0.88 metres, while antenna pole 'A1-B1' has been reduced by 0.7m (A1-B1 being further from the parapet edge).

Visibility Considerations

5.7. **a) Antennas A1-B1**

The agent would firstly stress the recognition of perspective, which is not taken account of on the supporting planning drawings, when assessing the impact of 2no. lightweight antenna poles upon an eight storey structure.

As shown on the attached photomontage 'C' (seen looking south from the eastern side of the pavement near the Hatton Garden/Hatton Wall junction), antennas A1-B1 when will be barely visible, protruding only slightly above the roofline.

Figure 1 shows the southern façade from a vantage point taken from the eastern pavement of Hatton Garden toward the southern end of the street, showing that A1-B1 is not visible from any point on Hatton Garden south of St. Cross Street, and nor are the equipment cabinets or railings, which are obscured from all views by the narrowness of St. Cross Street and relative heights of the structures which line it.



Figure 1

b) Antenna C1

Views of antenna 'C1' are limited to the area shown in figure 2, below:



The attached photomontages 'A' and 'B' show antenna C1 as it will appear from two different locations along the eastern pavement of Hatton Garden.

The agent would re-affirm the view that the antenna set of UK Broadband is much lighter than that associated with traditional telecoms operators and will not be clearly visible from distant vantage points. To illustrate, see Figure 3, a photograph of a recently installed UK Broadband antenna in Southwark. (Please also note that picture also shows an offset bracket to accommodate a dish antenna, which is now proposed at New House in order to allow for the reduction in height of antenna pole 'A1-B1') The antenna set and equipment therefore proposed is much more lightweight than that refused for mobile operators in 2001 and 2003, as made reference to by the case officer in his recommendation to refuse the application.



Figure 3

Access

- 5.8. As this site currently accommodates a telecommunications operator no alterations to the immediate surrounds are required in preparation for the construction or maintenance of the UK Broadband equipment.
- 5.9. Vehicular and maintenance access to UKB's equipment will use the existing access routes to the site. No alterations are required to these access routes in order to accommodate the development. Other than in cases of extremis, e.g. a fault or operational failure, there will be one or two maintenance visits to service the equipment per annum.
- 5.10. Base Stations and electronic communications apparatus, such as antennas, transmission dishes, and the sites for such equipment, are not designed to be accessible by members of the public. Consequently, there is no requirement to incorporate any inclusive access arrangements into the design and layout of the development.

Social and Economic Context

- 5.11. In respect of socio-economic factors, it is a key objective of central government to facilitate the growth of new communications networks, such as 4G wireless and high-speed broadband technologies, due to their importance in providing fast, reliable and cost effective services that can support the economy and help to meet sustainable development objectives.
- 5.12. 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.
- 5.13. These objectives were most recently expressed in the Digital Britain report published by the government's Department for Culture Media and Sport in June 2009. This 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.**"*

- 5.14. In order to overcome these obstacles, the report sets out the following key objectives that are directly relevant to the provision of broadband services:
- A Universal Service Commitment to ensure that all can access and benefit from broadband services. 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 and WiMAX 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."

- 5.15. 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 Digital Britain

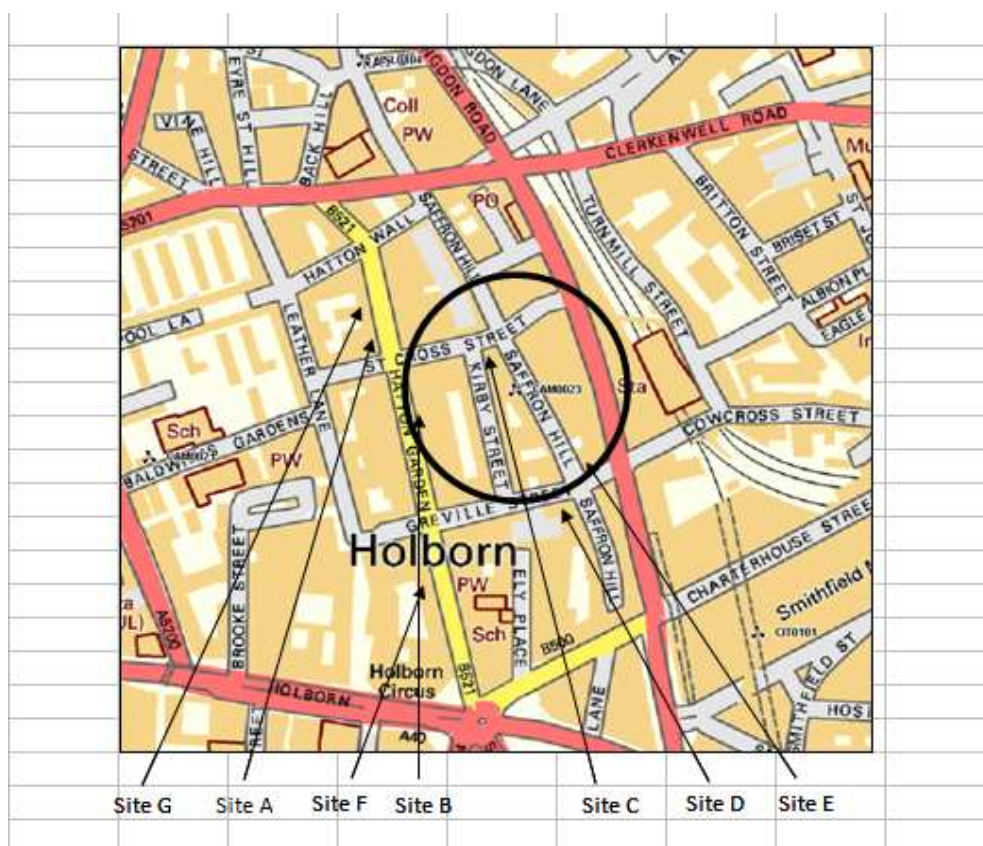
Report is available for viewing or download at:
http://www.culture.gov.uk/what_we_do/broadcasting/6216.aspx

6. Site Selection

6.1. The site was selected because it is an established telecommunications site. Site sharing is consistent with the principles of good telecoms development as laid out in relevant local and national planning policies. The proposal removes the need for a new installation elsewhere in the cell, thereby protecting the wider townscape interests of the Borough of Camden.

6.2. Discounted Options

As part of this process, the potential to install the base station at the following sites has been considered but discounted for the reasons explained below. Our Client's directed search areas are geographically constrained, and so the choice of site is limited by the availability of willing site providers, town planning and radio coverage constraints.



Option A: New House (Chosen Option)

Option B: 40-42 Hatton Garden

This site was considered for an installation but a new site at this location is less preferable from a telecoms planning point of view than a site share at New House. New house is taller than this property and can therefore provide the required level of coverage with minimal antenna height above the parapet, reducing visual impact.

Option C: 20-24 Kirby Street

This site was considered for an installation but a new site at this location is less preferable from a telecoms planning point of view than a site share at New House. New house is taller than this property and can therefore provide the required level of coverage with minimal antenna height above the parapet, reducing visual impact. Furthermore, a new building adjacent to this property will exceed its height by one storey, making coverage provision technically difficult without raised antennas which would have unacceptable visual impact.

Option D: 20-23 Greville Street

This site was considered for an installation but the site provider was not interested in the proposal. A site share at New House is preferable in planning terms to a new site at this location. New house is taller than this property and can therefore provide the required level of coverage with minimal antenna height above the parapet, reducing visual impact.

Option E: City View Apartments, 29A Saffron Hill, EC1N 8AG

This site was considered for an installation but the site provider was not interested in the proposal. A site share at New House is preferable in planning terms to a new site at this location. New house is taller than this property and can therefore provide the required level of coverage with minimal antenna height above the parapet, reducing visual impact.

Option F: 99-108 Hatton Gardens

This site was considered for an installation but our clients' coverage engineers confirmed that the site was too remote from the area requiring coverage. This site is closer to the next planned cell, located further south. Furthermore, a site-share at New House is preferable in planning terms to a new site at this location.

Option G: 63-66 Hatton Gardens

This existing telecoms site is located immediately north of New House and is comparable in planning terms to the selected option. New House is slightly taller and closer to the area requiring coverage. Furthermore, the plant-room upon New House would obstruct the provision of coverage southward from 63-66 Hatton Gardens, meaning that New House is the better option from a technical point-of-view.

7. Conformity of the Proposed Development with Planning Policy

The Development Plan

- 7.1. In England, the planning system is 'plan-led'. The Town and Country Planning Act requires planning applications to be determined having regard to the provisions of the Development Plan and other material considerations. Following the enactment of the Planning and Compulsory Purchase Act 2004, Development Plans in London comprise the London Plan and LPA based Local Development Frameworks with their constituent components such as a Core Strategy, Statement of Community Involvement and Development Plan Documents etc. Provision is also made for existing development plan policies to be saved pending the adoption of replacement development plan framework.
- 7.2. Whilst preparing a new local plan for the authority area, the development plan for the Borough of Camden currently comprises the following documents, amongst others:
- The London Plan: Spatial Development Plan for Greater London (Revised Version, July 2011), which comprises the Spatial Development Strategy for Greater London
 - The documents comprising the Camden Local Development Framework (2010)

(i) Relevant Policies of the London Plan

- 7.4. The London Plan, a spatial strategy for Greater London, was adopted in July 2011 and is a material planning consideration in the determination of this planning application.
- 7.41. UKB's proposed development is entirely consistent with and will help to implement the strategic objectives contained in *Policy 4.11 Encouraging a Connected Economy of the Plan*, which states that:

POLICY 4.11 ENCOURAGING A CONNECTED ECONOMY

The Mayor and the 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 enterprises 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.*

(ii) Relevant Policies from the Local Development Framework (2010)

- 7.6. The agent could not locate a policy which specifically controls the development of telecommunications infrastructure amongst the development policies (2010) contained within the Local Development Framework.

It will therefore be instructive to make reference to general design policy DP24:

DP POLICY

DP24 – Securing high quality design

The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

- a) character, setting, context and the form and scale of neighbouring buildings;
- b) the character and proportions of the existing building, where alterations and extensions are proposed;
- c) the quality of materials to be used;
- d) the provision of visually interesting frontages at street level;
- e) the appropriate location for building services equipment;
- f) existing natural features, such as topography and trees;
- g) the provision of appropriate hard and soft landscaping including boundary treatments;
- h) the provision of appropriate amenity space; and
- i) accessibility.

As the proposed development is to form part of a conservation area and will form part of a sector of central London with a unique townscape and long history, it will be instructive to refer to policy DP25 of the development policies document (2010) which states:

DP25 – Conserving Camden’s heritage

Conservation areas

In order to maintain the character of Camden’s conservation areas, the Council will:

- a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
- b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
- d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
- e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden’s architectural heritage.

Listed buildings

To preserve or enhance the borough’s listed buildings, the Council will:

- e) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;
- f) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and
- g) not permit development that it considers would cause harm to the setting of a listed building.

Archaeology

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

Other heritage assets

The Council will seek to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.

Assessment in light of DP24 and DP25:

The proposal removes the need for a new installation elsewhere in the cell, thereby protecting the wider townscape interests of the Borough of Camden, and conforming to a key principle of good telecoms development – site sharing – which is supported by both local and national planning policy.

The equipment of UK broadband is substantially more lightweight than that routinely used by mobile telecoms operators and will not impact substantially upon views of a rooftop which is already home to a mobile operator.

The antennas are to be set back from the parapet edge, which will reduce the visual impact of the proposal upon the skyline and in terms of long range vistas from vantage points in the locality. The 2 no. proposed dishes are to be 300mm in diameter each, and so will have negligible visual impact.

The reduction in the height of the antennas to their absolute minimum consistent with the adequate provision of coverage to the area will ensure that the optimum balance is struck between the requirement to provide 4G coverage to the area and the need to protect the heritage assets and visual amenities of the Borough.

National Planning Policy Guidance and Other Material Considerations

- 7.7. The National Planning Policy Framework (NPPF) was published on 27th March 2012. The NPPF supports high quality communications infrastructure and recognises it as a strategic priority.

- 7.8. At paragraph 42 it states: “Advanced, high quality communications infrastructure is essential for sustainable economic 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.”
- 7.9. Paragraph 43 advises *“where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.”*
- 7.10. Paragraph 44 states *“local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development”.*
- 7.11. In paragraph 45 it is confirmed that applications must include evidence to justify the proposal. This should include information relating to pre-application consultation with nearby schools or colleges, information relating to alternative sites investigated and a certificate of ICNIRP compliance.
- 7.12. The NPPF goes on to state at paragraph 46 that: *“Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure.”*
- 7.13

With reference to ‘conserving and enhancing the historic environment, the NPPF states in paragraph 128: *“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”*

Paragraph 132 states: *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.”*

8. Health Issues and ICNIRP Compliance

- 8.1. The proposed development, in common with other UKB installations, is designed to operate in accordance with ICNIRP guidelines and a signed declaration of this is provided with the planning application.
- 8.2. Although this certificate is usually provided in respect of mobile phone base station infrastructure, it applies to electronic communications apparatus operated by other Electronic Communications Code Network Operators such as UKB.
- 8.3. In 2006 the World Health Organisation published ‘Fact Sheet 304 Electromagnetic Fields and Public Health’, which considered scientific evidence dealing with health effects from low level human exposure to base stations and wireless networks. This report concluded:
- “...considering the very low exposure levels and research results collected to date, there is no convincing scientific evidence that the weak RF signals from base stations and wireless networks cause adverse health effects.”*
- 8.4. The consistent and reassuring message from the International scientific community, Government, the Courts and the World Health Organisation is that there is no proven evidence to suggest that electronic communications equipment operating within ICNIRP guidelines can cause adverse health effects.

- 8.5. Given these circumstances, UKB considers that any health-based objections submitted to the proposed development, although genuinely held, are unfounded and little weight should be given to them in the determination of the planning application.

9. Summary

- 9.1. UK Broadband have identified that this site is required to meet the 4G demands of customers in this area, and ensure local business and residents continue to be provided with the very latest in telecommunication advances. The proposed installation represents both the optimum planning/environmental and technical solution in this instance. As such, the development as proposed is in accordance with both local and national planning guidance as defined above. For the reasons set out in this document we consider that this application should be approved.

