SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Dutch House	Site Address:	Dutch House, 307 High Holborn, Holborn, London WC1V 7LL
NGR:	E:530948 N181591		
Site Ref Number:	*CTIL144584_VF36743*	Site Type:[1]	Macro

2. Pre Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	
If no explain why:		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why:		

Annual roll out consultation with LPA

Date of last annual rollout information/submission:	7 October 2013
Name of Contact:	Gavin Polkinghorn and Neil Storer
Summary of outcome/Main issues raised:	

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	22 April 2014	
Was there pre-application contact:	~~Yes~~	No
Date of pre-application contact:	N/A	
Name of contact:	N/A	
Summary of outcome/Main issues raised: No comments received to date.		

[1] Macro or Micro

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green	~~Amber~~	~~Red~~
Outline Consultation carried out: Pre-application consultation letters were sent to the Councillors for the Holborn and Covent Garden Ward (Cllrs Olad, Fulbrook and Vincent) and the Local MP, Frank Dobson on 22.4.2014.			
Summary of outcome/Main issues raised: No responses received to date			

School/College

Location of site in relation to school/college: St Alban's CofE School, Baldwins Gardens, London, EC1N 7SD St George the Martyr C of E Primary School, Johns Mews, London, WC1N 2NX
Outline of consultation carried out with school/college: Pre-consultation letters and plans sent to the head teacher and chair of governors for the above schools on 22.4.2014.
Summary of outcome/Main issues raised: No responses received to date

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: N/a		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	23/05/2014	

3. Proposed Development

The proposed site:

Background

Vodafone Ltd has entered in to an agreement with Telefónica UK Ltd pursuant to which the two companies plan to jointly operate and manage a single network grid across the UK. These arrangements will be overseen by Cornerstone Telecommunications Infrastructure Ltd (CTIL) which is a joint venture company owned by Vodafone Ltd and Telefónica UK Ltd ("the operators"). Due to the dramatic rise in the use of mobile data, the industry has had to consider new operating models that are efficient at delivering 3G and 4G services to a much larger percentage of the UK population, as well as supporting 2G services. Both companies pledge to close the digital divide between rural and urban areas, targeting 98% indoor population coverage across 2G and 3G by 2015. The agreement will also lay the foundations for two competing 4G networks to deliver the capability for a nationwide 4G service faster than could be achieved independently.

The agreement allows both organisations to pool their basic network infrastructure, while running two, independent, nationwide networks allowing consumer choice. By doing this, they will both reach far more of the country far faster than they could achieve on their own. This single network grid will automatically increase each operator's footprint by 40%, adding competition and choice for customers in areas that previously only had one operator's coverage available.

The agreement will also provide enhanced capacity for both operators' customers in the future, which will be especially important with the ongoing launch of the 4G networks. From an end user customer perspective there will be no change as customers will continue to use their branded network of choice. This agreement is about consolidating infrastructure assets, clearing the way for innovation and the creation of enhanced services that customers really want at the most affordable cost.

In relation to the application site, CTIL and the operators are looking to progress works which will entail the upgrading of the existing radio base station site at the Dutch House, 307 High Holborn, Holborn, London WC1V 7LL. The site is currently used by Vodafone to provide 3G services. The proposal is to upgrade the site to enable Vodafone to provide both 2G and 3G coverage and capacity and future enablement for 4G services.

The site is located on the south side of High Holborn and lies within the Bloomsbury Conservation area.

The surrounding nature of the site is predominantly retail units together with some small commercial premises on both the north and south aspect of High Holborn Street. There are no residential dwellings adjoining the proposed site.

The existing radio base station is located at roof level on top of the plant room on the Dutch House building located on High Holborn Street. The operators existing equipment consists of 3 no. existing pole mounted Vodafone 3G antennas, 2 transmission dishes and 1 no. equipment cabinet. Two of the antennas are located on the north east corner of the plant room roof and the other is located on the south east corner. The transmission dishes are also located on the south east corner of the plant room roof. The equipment cabinet is located in the centre of the roof, well back from the roof edge.

Enclose map showing the cell centre and adjoining cells:
This is an upgrade to the existing site to fundamentally allow Vodafone to upgrade the site and provide an enhanced level of coverage to their customers within this locality.

Type of Structure: Pole Mounted Antennas

Description:

The proposed development relates to the upgrading of an existing radio base station consisting of the removal of the existing 3 no. Vodafone antennas and 1 no. equipment cabinet and the installation of 3 no. replacement antennas, 2 no. replacement cabinets utilising the existing poles and ancillary development thereto on the rooftop of Dutch House.

The proposed replacement antennas will be of a similar size and shape to the existing antennas which are proposed to be removed and will be located in the same positions on the same existing supporting poles.

The development also includes the replacement of the 1 no equipment cabinet with 2 no equipment cabinets, the dimensions of which are detailed within the equipment specification below. They will be located on the roof level at a height of 25.2 metres above ground level. These cabinets will be a maximum of 1.45m in height. All elements of the proposals can be painted to the Local Planning Authority's requirements although grey is suggested to match the existing equipment cabinets already in situ.

Overall Antenna Height:	31.1 Metres (top)
Height of Building	28.4 Metres (top)
Proposed additional Equipment Housing: Ericcsson (x1)	
Length:	0.700 Metres
Width:	1.300 Metres
Height:	1.45 Metres
Materials:	
Tower/mast etc. – type of material and external colour:	Same as existing
Equipment housing – type of material and external colour:	Grey

Reasons for choice of design:

The operator has occupied this site for a number of years and the site now comprises an established design consisting of 3 no. existing antennas which are pole mounted on the rooftop of the building, together with 1 no. roof based equipment cabinet. Whilst this site currently provides Vodafone 3G coverage to the immediate area, the upgraded site is needed to allow Vodafone to increase their existing network capacity and provide their existing customers with an enhanced level of coverage.

To achieve Vodafone's upgrade requirements, the operator will need to remove their existing 3no antennas and replace these with 3 no. replacement antennas. In addition, the operator will need to replace the existing equipment cabinet with 2 no. equipment cabinets. The proposal is to utilise the existing poles, retaining the same height and similar design to the existing antennas therefore the replacement antennas will not have a detrimental impact on the setting of the building or the wider conservation area.

It is acknowledged that the replacement antennas will remain at the same top height as the existing antennas already in situ, in the same location and will be of a similar design. They will remain well shielded from public vantage points due to their position set well back from the main highways surrounded by the building mass of the host building. Therefore the visual impact is not increased and there are no alterations to the building itself

as the existing pole mounts will be reutilised, thus there will be no detrimental impact to the surrounding conservation area. In view of this the setting of the Bloomsbury conservation area will be preserved.

The new equipment cabinets will be located within the centre of the rooftop some distance from the roof edge in the same location as the existing equipment cabinet already in situ. Therefore the equipment cabinets will remain shielded from external public vantage points as the building mass of the host building and the plant room roof will screen the cabinets from view. It is highlighted that in continuing to utilise an existing telecommunications installation this would ultimately reduce the need to introduce a new installation in to this cell area. This will avoid the need for added proliferation of new masts within the surrounding area whilst allowing the expansion and improvement of the operator's electronic communications network, including telecommunications and high speed broadband.

The equipment cabinets are ancillary to the functionality of the antennas and the additional equipment cabinet and will have an appearance similar to the existing equipment cabinet already in situ. As the equipment cabinets will have a maximum height of 1.450m, that there is more than 1.45m to the edge of the host building's roof and that the height of the host building is in excess of 25m, the equipment cabinets will not be visible from any external vantage points. Therefore the roof based development will not have a detrimental impact on the visual amenity of the area and through appropriate siting will assist in blending effectively with its surroundings.

It is appreciated that the pole mounted antennas may be visible to some pedestrians and road users. However, the replacement equipment is located at the same height as the antennas already in situ and in the same positions. The replacement antennas will be positioned in a break from the sensitive design of the buildings fronting the main roads surrounding the site, thus remaining largely hidden from immediate view. This ensures that the replacement antennas will not be seen as detrimental to the visual amenity of the area and character of the streetscene.

The technical requirements of mobile communication operators such as the applicant are acknowledged in the National Planning Policy Framework which states that local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband.

In address of the appearance of the proposal, it is believed that the scheme takes a form which is sympathetic within the context of its immediate street scene which includes mainly retail and commercial premises. Aware that some standard mast designs can appear incongruous, it is highlighted that the antennas would remain in the same location to the existing scheme at the same height while the proposed additional equipment cabinet will have minimal visual impact due to the proposed location.

Placing masts near similar structures and utilising simple and unfussy designs is acknowledged in the Code of Best Practice on Mobile Network Development to be less likely to dominate and be in discord with the landscape and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area. This design is considered to be an appropriate solution and shows the applicants efforts to help mitigate the proposals impact on the visual amenity, whilst also ensuring that proliferation of masts are reduced by the utilisation of existing structures by two operators as outlined within NPPF.

In light of the operators' efforts to design the best solution for this particular site so as to minimise the impact of the development on the environment, it is considered that the appearance of the replacement antennas would not seriously impact on the visual amenity of the area, nor would it form an obtrusive feature within the streetscape.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design which is proposed on the existing installation represents the best compromise between the visual impact of the proposal on the surrounding area and meeting Vodafone's technical requirements for the site and locality. Taking all matters into account it is considered that the proposal to deliver the capability for an enhanced level of Vodafone coverage would not

appear out of place within the street scene.

4. Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached 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 the site are taken into account.	Yes	

Frequency:	2G 900MHz MHz 3G 900Mhz and 2100Mhz
Modulation characteristics[2]	2G (900) –GMSK 3G (900 or 2100) – QPSK
In order to minimise interference within its own network and with other radio networks, Vodafone Ltd operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of Vodafone Ltd'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.	900 MHz 32 dBW 2100 MHz 35 dBW

[2] The modulation method employed in 2G (GSM) is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase modulation
The modulation method employed in 3G (UMTS) is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation
The modulation method employed in 4G (LTE) is 64 QAM (Quadrature Amplitude Modulation) which is another form of Phase Modulation

5. Technical Justification

Enclose predictive coverage plots.

Reason(s) why site required e.g. coverage, upgrade, capacity (map attached if required):
A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the county. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are. The distances between transmitter sites will depend on many factors, including the geography of the mobile services. There is a specific requirement for an upgraded radio base station at this location to allow Vodafone to provide additional coverage to their existing customers within this busy location. This single network grid will automatically increase each operator's footprint by 40%, adding competition and choice for customers in areas that previously only had one operator's coverage available and is a principal reason for the proposed upgrade. Additionally, laying the foundations for a 4G system that provides mobile ultra broadband internet access, e.g. to laptops with USB wireless modems, to smartphones and to other mobile devices, is desirable. 4G provides superfast mobile broadband and will provide better, faster and more reliable mobile broadband connection according to Ofcom's Chief Executive. OfComs Chief Executive also acknowledges that down load speeds will initially be at least 5 to 7 times faster than existing 3G networks. The National Planning Policy Framework states at paragraph 46 that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt, the proposed installation is needed for both companies, via CTIL to operate and manage a single network grid across the UK using MORAN technology. The Government has expressed its commitment to the UK having the best superfast broadband network (i.e. those services with a headline speed of 30Mbit/s or more) by 2015. It also wants superfast broadband networks to be available to 90% of homes and businesses. According to OfComs Communication Marketing Report 2013 it found that the proportion of homes which accesses the internet or web-based services over a mobile network increased by 8% in the last year to 50% mainly due to the increasing smartphone take-up (i.e. phones which are specifically designed for the consumption of internet-enabled services such as websites and mobile applications). At the same time the use of email, social networking sites and instant messaging services all increased. Ofcom estimates that the number of subscribers who accessed the internet from mobile phones increased by nearly 9 million in 2012. In the first quarter of 2013, 49% of UK adults accessed the internet using a mobile phone, a 10% increase on last year. Three quarters of those aged 16-34 said they accessed the internet using a mobile. The report found that people in the UK spent an average of over one day a month using the internet over a mobile network or a fixed internet connection PC in 2012. During 2012, the average time spent using a mobile data connection increased by 8 minutes a day (6%). The report also found that an average household spend on mobile services increased by 3.4% largely as a result of the growing use of mobile data services (i.e. smartphones). The growth in smartphone take-up has resulted in increasing use of mobile data services. The percentage of mobile users who used their handset to access emails, download applications and send and receive instant

messages has at least doubled over the last two years to 36%, 29% and 26% respectively in the first quarter of 2013. It has become so popular that the number of voice calls has been overtaken by such mediums as email, texting and social networking sites. Indeed, 47% of all mobile users accessed their mobile in the first quarter of 2013, up from 28% in 2011.

Ofcom Research 2013 reported that 66% of mobile data users who access the internet do so equally inside and outside the home. The location of most mobile broadband use outside the home is when travelling (25%), at someone else's house (22%) and indoor public spaces (18%).

According to Ofcom research conducted in April 2013, 30% of smartphone users intend to upgrade to 4G at the end of their current contract. The most commonly cited reason for wanting a 4G service is speed. 73% of smartphone owners said they wanted a 4G service for quicker download speeds and 59% said they wanted 4G to enable faster streaming. The second most commonly cited reason for a 4G service was the reliability of the data service to take advantage of 'improved data coverage' and a 'more reliable data connection'.

The Ofcom Report found that it is likely that faster mobile data networks will contribute to further increases in average data consumption and 44% of smartphone users questioned by Ofcom in April 2013 said they would use their handset more if their mobile data connection was faster. The Report stated that data collected by BillMonitor, a company that aims to help subscribers to analyse their mobile bills and find suitable tariffs, showed that consumers' use of mobile data increased at an annual rate of 70%.

The area within which an installation needs to be established in order to meet the coverage requirement is constrained by the location and extent of the coverage provided by existing installations in the surrounding area. The proposed scheme utilises an existing established radio base station installation which will be upgraded to provide additional Vodafone coverage without the requirement for any further installations to be proposed within this sensitive locality. This will enable the operators to meet their efficiency, capacity and ever increasing technical capability requirements within a single grid network.

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 authority in understanding any technical constraints on the location of the proposed development.

6. Site Selection Process

In accordance with the licence obligations and advice in the National Planning Policy Framework and the Code of Best Practice the applicant's network rollout team investigated the following siting and design options using this sequential approach to site selection:

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

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution. New sites are only developed where there are no viable or accessible alternatives or it is the local planning authority's preferred approach. The feasibility of the acquisition, build and maintenance of the site also needs to be taken into account.

In accordance with the above sequential approach, and in line with the principles of pooling the two operators existing network infrastructure to create a single network grid, the proposal is to upgrade the existing base station in this location.

Site[3]	Site Name and address	NGR	Reason for not choosing[4]
N/A	N/A	N/A	N/A

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

As referred to above, the applicant has taken a sequential approach and is seeking to redevelop an existing installation to provide additional telecommunications coverage to service to the local surrounding area. It is considered that utilising an existing established radio base station installation is preferable to pursuing a second base station within the immediate vicinity, as it would reduce the visual impact therefore preserving the character and amenity of the area. Given the makeup of the area and the siting of existing telecoms infrastructure on the site, it was established that the upgrading of facilities through the use of existing infrastructure would be the most viable solution which could provide the additional levels of Vodafone coverage to this area. Based on this sequential approach no other sites have been considered.

Additional relevant information:

Siting:

The cell area is largely located within a conservation area and therefore site selection is restrained in this regard. The proposed location on top of a roof, set well back from public highways largely screened from immediate views in a commercial/retail environment is considered to be the most suitable for the proposed location.

The equipment installation and antennas have been sited on the rooftop of Dutch House some distance from High Holborn and Chancery Lane, whereby their presence will not impair the visibility or safety of passing motorists or pedestrians. The antennas are proposed to be painted in a colour to be agreed with the Council so

[3] ETS – Existing Telecomm site, ES – Existing Structure, RT – Roof Top, GF – Greenfield
[4] SP – Site Provider, RD – Redevelopment Not Possible, T – Technical Difficulties, P – Planning, O - Other

that they will not appear overly dominant in this location.

The equipment cabinets are to be positioned towards the centre of the host building rooftop and therefore will not be visible from public vantage points. As such, their visual impact on the streetscene will be minimal.

Although the site is located within a conservation area this is where Vodafone customers have a 2G/3G capacity shortfall and require enhanced capacity levels. The choice of location on a rooftop is in complete accordance with the guidance set out in the NPPF which supports the use of existing buildings to expand the electronics communications networks, including telecommunications and high speed broadband ahead of new ground based sites.

The proposal will retain access from High Holborn and therefore will not have any additional impact on the existing highway network. Given the proposals siting on the roof of the building, the site will only be accessed by those personnel associated with the applicant. In light of the siting of the antennas on top of a building and that the intended use is to provide mobile phone coverage, the public should have no interest or need to access the base station. It should therefore be recognised that access to the proposals is set well away from recognised public rights of way and is remote from pedestrian and vehicular movements within the public realm.

It is likely that once built, the site will be visited infrequently, for maintenance purposes only. Right of entry to the site will be primarily by foot in which case the applicant will make use of internal access arrangements so as to gain access to the equipment cabinets and antennas at rooftop level.

Appearance

The operator recognises the need to minimise the visual impact of any new structure on the site. The proposed antennas are the thinnest and smallest possible, supported by the most minimal of supporting structures in order to house all 3 no. 2G/3G antennas on an existing building.

The proposed antennas at the same top height as the existing antennas at a top height of 29.9m and 31.1m above ground level are required in order to accommodate operator's antennas at a height which allows clearance of surrounding natural and built features. This will allow the required improvements to network capacity to be provided. Furthermore, if the antennas were to be located at any lower levels then the roof of the host building would interfere with the antennas and cause clipping so that they would not operate effectively and due to technical issues large sections of the main rooftop would be sterilised.

Glimpses of the proposed antennas may be seen within the surrounding area. However, they will be set within the context of existing vertical street structures. The antennas will not appear obtrusive as they will painted in a colour to be agreed by the council although grey is suggested as this would match the sky and will only be visible if people look up to the roof top and study it closely. This is not a natural stance for most people to employ and even less likely as the immediate vicinity is dominated by non-residential buildings within a mixed use area where business and retail premises dominate.

In light of the operator's efforts to design the best solution for this particular site so as to minimise the impact of development on the environment, it is considered that the appearance of the proposed antennas would not seriously impact upon the visual amenity of the area, nor would it form an obtrusive feature within the streetscene.

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

It is not necessary to quote extensively from this document but the following points are highlighted.

National Planning Policy Framework (March 2012)

The governments National Planning Policy Framework (NPPF) was published on 27 March 2012 and consolidates the majority of planning policy documents into a single circular (including PPG8, and PPS1). The Government's latest thinking strongly supports communications infrastructure. Paragraph 42 of the framework document sets out the objectives of the Communications Infrastructure. It states that '*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*'.

Paragraph 43 states that '*Local Planning Authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband*'. It goes on to acknowledge that the numbers of radio and telecommunications masts and the sites for such installations should be kept to the minimum consistent with the efficient operation of the network. The NPPF supports the use of existing masts, buildings and other structures, unless the need for a new site has been justified. It goes on to state that where new sites are required, the equipment should be sympathetically designed and camouflaged where appropriate.

NPPF paragraph 46 sets out a clear message to local planning authorities on health issues and the need for telecommunications systems. It states 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*'.

Throughout the NPPF there is strong support for sustainable development which is summed up in paragraph 14 which states 'At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. For decision-taking this means:

- Approving development proposals that accord with the development plan without delay; and
- Where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission unless:

- 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; or
- Specific policies in this Framework indicate development should be restricted.

Section 7 of the NPPF sets out the requirement for good design and states at paragraph 56 that '*the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people*'. Paragraph 65 goes on to state that '*local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design*'.

The NPPF sets out 12 core principles which should underpin plan-making and decision-making these principles include that every effort should be made objectively to identify and meet development needs of an area, and respond positively to wider opportunities for growth (para 17).

Annex 1 of the NPPF sets out the implementation of the NPPF and advises in paragraph 214 that for 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 [in development plan documents adopted in accordance with the Planning and Compulsory Purchase Act 2004]. Paragraph 215 goes on to state that in other cases and following this 12-month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with this

Framework (the closer to the policies in the plan to the policies in the Framework, the greater the weight that may be given).

Code of Best Practice on Mobile Phone Network Development in England (July 2013)

The Code of Best Practice provides guidance primarily to mobile network operators, their agents and contractors and to local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2002).

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure is achieved in a timely manner, but in a way that also minimises the potential impact that can be associated with such development. It provides clear and practical advice to ensure the delivery of significantly better and more effective communication and consultation between operators, local authorities and local residents.

The Code highlights that the mobile telecommunications network is a crucial piece of national infrastructure in both economic and social terms. It acknowledges that the pressure on networks to upgrade and improve networks through changes to existing sites and the development of new sites is constant. With the increasing consumer demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity. This is due to the ever increasing demand for data hungry applications to be available to a range of connected devices, such as smartphones and tablet computers. However, The Code notes that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which they rely.

The Code acknowledges that the operators anticipate largely using existing network infrastructure for the provision of 4G services and are similarly upgrading their 2G and 3G network infrastructure to improve capacity and coverage. However, the Code goes on to state that this does not mean that there will not be a need for new base stations. More base stations will be needed in areas where there has previously been only limited or no coverage, and where coverage and capacity needs to be enhanced in line with Government Policy and customer demand or where sites have been lost for example due to redevelopment.

Mast and site sharing continues to be supported within both Government policy and the Code of Best Practice. The Code acknowledges that shared sites will tend to be slightly bigger, but fewer sites will be needed overall to improve coverage and capacity. The Code acknowledges that sharing of sites is now the norm, and network operators now share much of their network infrastructure via joint venture commercial arrangements.

The Code provides guidance on siting and design at Appendix B and continues to acknowledge that camouflaging or disguising equipment is considered materially appropriate with more modern masts frequently able to blend into their surroundings far more effectively than some of the older masts. In reducing the environmental and visual impact of the installation the Code of Best Practice promotes the use of simple and uncomplicated designs. *"Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts."* In this regard, the proposed replacement antennas on an existing rooftop set in from the roof edge will ensure that the environmental and visual impact of the equipment remains low as the antennas are of the same height and similar appearance to the antennas that they replace and will be utilising the mounting poles of the existing antennas. They are also positioned on an existing rooftop some distance from public areas.

Concerning the erection of new ground based masts; The Code provides examples of where the environmental and visual impact of the mast can be greatly reduced.

- *Placing the mast near similar structures. For example, industrial and commercial premises, road signs and lamp posts;*
- *Using simple and unfussy designs. Masts which have complex designs are more likely to dominate and be*

in discord with the landscape and have adverse visual impacts; and

- *Appropriate colouring.*

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that *"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise"*.

The Development Plan as defined by the Planning and Compulsory Purchase Act 2004 for Camden Borough Council currently comprises the following documents:

- The London Plan: Spatial Development Plan for Greater London, February 2008 which comprises the Spatial Development Strategy for Greater London; and
- Camden Core Strategy 2010-2025 (2010)

Relevant Policies of the London Plan

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. Paragraphs 1.58-1.60 'Impact of new technology' of the Plan recognises the growing strategic importance of new communications technology services, such as 4G coverage, will help to deliver:

1.58 – Transactions using increasingly sophisticated communication technologies have grown enormously, affecting every aspect of everyday life. E-tailing, e-commerce and e-government are all likely to have an impact on London and its place at the core of local networks. This plan addresses issues of the digital divide between those who have and do not have access to the new technologies, distinguishing between the needs of commerce and residents. Economic and population growth in higher density, intensive development will make it more economic to ensure the provision of broadband and new technologies.

1.59 – In the emerging information society, London will need to become increasingly a learning city in which skills and the ability to use information will be essential. This will place heavy demands on education and training resources.

1.60 – Finally, information technology will add to the flexibility of home and work environments, but will not replace the need for regular face-to-face meetings. It may lead to work journeys being spread over a longer part of the day, and to more local journeys being made, for example to services and cafes.

In this regard, the proposal to upgrade the existing Vodafone installation at Dutch House, meets with this planning strategy for Greater London and will facilitiate many of the requirements which this strategy has been designed to provide for the residents of Greater London.

Camden Core Strategy 2010-2025 (2010)

The Camden Core Strategy was adopted in November 2010. It provides the vision, objectives and spatial policies to guide development in the borough up to 2025. There are no policies relating to telecommunications development within the Camden Core Strategy. Telecommunications proposals are therefore determined in line with the national guidance set out in the NPPF and The Code of Best Practice.

The following paragraphs set out how the application complies with the NPPF, The London Plan and The Code of Best Practice.

Having taken the contents of the NPPF and The London Plan into consideration, the proposal for the upgrading

of the existing installation at Dutch House fully meets with national guidance. The requirement for the additional capacity/coverage is urgently required and the operator is meeting with the policy's guidelines in that the upgraded equipment is sited on an existing building utilising an existing radio base station. Furthermore, the proposed development has been designed with the sensitivity of the area in mind whereby the antennas are utilising the existing poles, located away from the main elevation of High Holborn and Chancery Lane, whilst the replacement equipment cabinets will be located in the same location as the existing cabinet proposed to be removed which is partially covered by the rooftop plant room. Given that the cabinets are located towards the centre of the rooftop some distance from the roof edge, together with the height of the host building, this will ensure that they are not visible to passers-by or nearby properties. As such, the visual amenity of the area is not impaired.

The upgraded installation will meet the aspirations of the NPPF which encourages the use of sympathetic design to minimise the impact of the development on the environment as well as the utilisation of existing masts. The proposals relate to the replacement of the existing antennas located on the rooftop of Dutch House. These replacement antennas will be located in exactly the same positions as the existing antennas at the same height and therefore will not impact on the conservation area any more than the existing antennas already in situ. The Code of Best Practice also acknowledges that the visual impact of the mast can be greatly reduced if it is placed near similar structures such as commercial premises. The site is located on a tall retail building off High Holborn, a commercial street, in addition to the proposed upgrade utilising the existing equipment. It is therefore considered that the installation should merge into the existing streetscene and not be viewed as an alien feature within its setting. As a result, the proposed design fully accords with the Code of Best Practice and the NPPF.

The proposed replacement telecommunications mast and equipment cabinets fully comply with national guidance contained within the NPPF. Government guidance states that in order to limit visual intrusion the number of radio and telecommunication masts and the sites should be kept to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need of a new site has been justified [NPPF para 43].

As already highlighted the replacement antennas will continue to be located in the same location as the existing antennas already in situ and at the same height, they will also be of a similar width. Therefore they will not impinge on the skylines or vistas of the conservation area. This is due to their location towards the centre of the host building on a plant room roof, some distance from the roof edge. Therefore the antennas are screened by the building mass of the surrounding properties and distance to public spaces. Consequently the character and appearance of the conservation area will be maintained.

The application site is an established telecommunications radio base station. Given that the proposal is to replace the existing site with one capable of allowing both operators to continue to operate from the same site, then this is in accordance with the national guidance set out in the NPPF and The Code of Best Practice. This offers the best environmental solution, limiting the amount of new sites required in this sensitive area whilst continuing to allow the operator to utilise the same site, limiting the visual intrusion in the area. For the avoidance of doubt, the existing antenna design would not be able to support the operator's upgrade requirements.

The principle of a telecommunications base station installation in this location has already been accepted by the Council and become part of the established streetscene. The proposed upgrade to the existing site is sequentially the most preferable option. The operators are looking to upgrade their existing installation to primarily enable Vodafone to meet the existing and future demands of its mobile users. In this respect its continued presence and operation is essential in providing additional network coverage/capacity for Vodafone. Given that a sequential approach to site selection has been undertaken, whereby the proposal seeks to replace the existing antenna configuration on the established telecommunications site, it should be acknowledged that the proposed works would have limited impact on the townscapes as it will continue to be shielded from view from the nearby major roads. Taking into account the predominantly business and retail character of the area in the nearby locality, it is considered that continuing to site the antennas away from the roof edge of the host

building some distance from the public arena well away from public view remains an appropriate location to site the replacement antennas. The radio base station is set well back from the main highways on the rooftop of Dutch House surrounded by other tall buildings, therefore the antennas will continue to remain largely hidden from view to passers-by walking along High Holborn and Chancery Lane. The proposed upgrade would not be intrusive in the street scene and its very limited visual impact would not outweigh the need and future telecommunication coverage/capacity demands within this locality. The design of the replacement antennas will be as similar as possible to the existing antennas having the same height and similar diameter in order to minimise the impact on the surrounding area.

The design chosen is one of the most sensitive designs available to the operators' to utilise the same site, making efficient use of land and enabling the latest technologies to be provided to the cell area. It is also located where there currently is an established telecommunications installation in the same location as the existing antennas. As such, it will continue to preserve the setting and character of the conservation area.

In terms of its scale, design and siting the replacement antennas will resemble as closely as possible the existing antennas already in situ in the same location. The proposed height of the antennas will remain at 29.9m and 31.1m and have a similar width. As a result they will not appear obtrusive within the area.

The NPPF strongly supports sustainable development, as does The London Plan and the Council's Core Strategy. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore comply with NPPF, The London Plan and the Council's Core Strategy to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

The proposal will help to meet the operator's license obligations and continue to meet the reasonable customers' demands which include being able to access their mobile phone whenever and wherever they are. The replacement installation will continue to enable the operator to provide a high quality service to its customers and access to the latest technologies. An installation located outside this search area would not allow the operator to provide their desired level of coverage and therefore would not adequately fill the 2G/3G coverage/capacity gap nor be 4G enabled for the future.

Taking into account the relevant planning policies which are applicable it has been illustrated that the proposed upgrade fully accords with national planning policy guidance. In light of the above, the applicant considers that the proposal strikes a good balance between environmental impact and operational considerations.

Health & Safety

Court cases have confirmed that the public perception of health risks can be a material consideration within the land-use planning system. However the weight to be attached to this issue has to be determined accordingly in each case by the decision maker. It has been generally held, and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been demonstrated that the proposed installation will comply with the ICNIRP guidelines.

It should be recognised that it has been long since established that it is Central Government's stance that the planning system is not the appropriate mechanism for determining health safeguards. It remains Central Government's responsibility to decide what measures are necessary to protect public health. Most notably it is Central Government's view that if a proposed development meets the ICNIRP guidelines for public exposure it should not be necessary for a Local Planning Authority, in processing an application for planning permission or

prior approval, to consider further the health aspects and concerns about them.

In this respect the operators believe that it is not necessary to consider health effects further. Vodafone as operators are committed to ensuring that all new installations are ICNIRP compliant therefore it is considered that there is no basis for this case to be refused on health and safety grounds or for reasons relating to public concerns about health and safety. An ICNIRP compliance certificate is attached as part of this submission, as required by NPPF paragraph 45, in which the ICNIRP declaration takes into account the cumulative effect of the emissions from the proposed installation and all radio base stations present, at or co-located near to the proposed installation. Radio frequency emissions from the proposed installation will be may times lower than the ICNIRP reference standard in all publicly accessible areas around the installation. In the light of the above information, it is clear that the weight to be given to such concerns should not be so great as to warrant a refusal of the case on health grounds.

Summary

To summarise the case in favour of the proposals the following points are of relevance:

- With specific regard to telecommunications development, the proposal accords fully with The London Plan, the NPPF and the Code of Best Practice;
- Site selection was progressed in accordance with the applicants licence obligations, advice in NNPF and the Code of Best Practice and represents the least environmentally intrusive, technically suitable, available option;
- With the advent of smartphones and tablet computers the demand for indoor 3G coverage and high speed data capture is increasing rapidly and the operators are obliged to meet this demand and provide a high quality service in line with the NPPF guidance.
- An existing structure is being upgraded by the applicant with minimal alterations in order to allow the operators to manage a single network grid and which fully accords with NPPF guidelines;
- The operator's site selection strategy is to keep the overall environmental impact to a minimum through utilising the same sites wherever possible. The operators are utilising the same site where it is technically and legally possible and is the sequentially preferable environmental solution;
- The proposals would not constitute a proliferation of telecommunications installations as advocated by NPPF;
- The height of the proposed replacement antennas will be the same as the existing antennas already installed on the structure. The replacement is required to provide Vodafone with enhanced capacity/coverage from the installation to cope with the soaring demands on the network within this dense urban environment. The proposed alterations have been kept to the absolute operational minimum to clear the immediate buildings and provide adequate service coverage and capacity for the operator to the immediate area.

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