TELECOMMUNICATION INSTALLATION

FOR

EE Limited

at:

Rooftop Telecommunications Site

133A-135 GRAYS INN ROAD, CAMDEN, LONDON, WC1X 8TZ

SUPPLEMENTARY INFORMATION FORM

incorporating

DESIGN AND ACCESS STATEMENT

January 2015

Prepared by:

Daly International

EE Limited ref:
50020/ 133A 135 GRAYS INN ROAD

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	133A 135 GRAYS INN ROAD	Site Address:	ROOFTOP TELECOMMUNICATIONS SITE, 133A-135 GRAYS INN ROAD, CAMDEN, LONDON, WC1X 8TZ
NGR:	E 530811, N 182253		
Site Ref Number:	50020	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	**No**
If no explain why: Upgrade of existing site		
Was the industry site database checked for suitable sites by the operator:	Yes	**No**
If no explain why: Upgrade of existing site		

Annual roll out consultation with LPA

Date of last annual rollout information/submission:	October 2014
Name of Contact:	Chief Planning Officer
Summary of outcome/Main issues raised:	It was agreed that the LPA and EE Limited would adhere to the *10 Commitments*.

Pre-application consultation with LPA

Date of written offer of pre-application consultation:		
Was there pre-application contact:	Yes	**No**
Date of pre-application contact:		
Name of contact:		
Summary of outcome/Main issues raised: As the proposed development is considered a minimal addition to an existing site, it was deemed unnecessary to conduct any pre-application consultations.		

[1] Macro or Micro

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red	Amber	**Green**
Outline Consultation carried out: The proposal was rated as GREEN, in accordance with the guidelines set within the code of best practice for telecommunication operators. Due to this rating, and the fact that the development is considered to be a minor alteration to an existing site, no consultation was deemed necessary.			
Summary of outcome/Main issues raised: N/A			

School/College

Location of site in relation to school/college: There are no schools in the nearby vicinity of the proposed development.
Outline of consultation carried out with school/college: As the proposed works are minor in nature and located away from any of the surrounding schools, it was deemed unnecessary to carry-out pre-application consultation prior to the submission of this application.
Summary of outcome/Main issues raised: N/A

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?	Yes	**No**
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	**No**
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?		**Yes**	No
Date served:			26/01/2015

3. Proposed Development

The proposed site:	
Rooftop Telecommunications site, 133A-135 GRAYS INN ROAD, CAMDEN, LONDON, WC1X 8TZ NGR: E 530811, N 182253	
Type of Structure : Rooftop Telecommunications Base Station (50020)	
Description: Installation of 3 no. additional antennas painted to match brickwork, plus ancillary works.	
Overall Height:	n/a
Height of existing building :	14.3m
Equipment Housing:	
Length	
Width	
Height	
Materials :	Steel
Tower/mast etc – type of material and external colour:	N/A
Equipment housing – type of material and external colour:	Grey as existing (to be removed)

Reasons for choice of design:
The existing 'EE Limited' telecommunications site is located near the junction of Guilford Street and Gray's Inn Road (A5200) in Camden, London. The site is a roof-top telecommunications site, situated on top of a mixed land-use building. The building is just within the demarcated boundaries of the Bloomsbury Conservation Area. Bloomsbury is widely considered to be an internationally significant example of town-planning because of its original street layouts interspersed with landscaped squares in between. Today, the area is influenced by major institutional uses that established themselves and developed over time. The buildings surrounding the site are primarily mixed land-use, commercial and institutional buildings. The existing telecommunications site currently provides only 2G and 3G services, to its customers in the local area. The proposed telecommunications upgrade intends to add 4G technology to the site, in order to favour 4G coverage in the local area, alongwith improving the existing 2G and 3G coverage. I would like to bring your attention to the fact that the existing development being amidst a busy part of the city, would require it to deliver high-quality and faster telecommunications network connectivity, in the range of the local area. The proposed development is a part of nationwide network integration and upgrade project being rolled out by our clients, 'EE Limited'. 4G is the fourth generation of mobile telecommunications technology and enables faster internet access. The proposed development is a part of nationwide network integration and upgrade project being rolled out by our clients 'EE Limited'.

The telecommunications site currently comprises of 3 no. antennas painted to match existing brick work, 5 no. equipment cabinet units within internal equipment room at basement level, plus ancillary works.

Fig. 1: Existing antennas mounted on support poles

Fig. 2: Existing equipment cabinets within internal room in basement

The proposed development involves the installation of 3 no. additional antennas, fixed on proposed offset brackets, mounted on the wall. The proposed new antennas are required in order to add 4G technology to the existing 2G-3G site. There was no means of achieving the required technology upgrade, without adding new antennas to the existing site. The proposed antennas will be fixed at the same location and height as the existing ones and coloured to match existing brickwork.

Other minor ancillary and electrical works are proposed in order to accommodate the proposed antennas, as detailed in the attached drawings. Due to the technical constraints of the technology involved, there is no variation possible in terms of the size or design of the proposed equipment units. They are, however, of the smallest scale possible, capable of providing the required service upgrade.

As the proposed works constitute upgrade of an existing site, it omits the identification of any other sites in the area. This is consistent with the government policy, as set out in NPPF, which seeks to keep the number of base stations to the minimum.

The proposed antennas will be visible from Gray's Inn road, as one faces south. However, the antennas are proposed to be painted to match the existing brickwork. This technique will help in camouflaging the antennas to match the wall façade they are mounted on, thereby reducing the visual impact caused by them to on-lookers. Bearing in mind, the long-term benefits that the proposed development would provide in terms of improved existing 2G-3G coverage and newly added 4G coverage, the minimal visual impact caused should be considered acceptable.

4. Technical Information

ICNIRP 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	**Yes**	No

and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas, where exposure may exceed the relevant guidelines. When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, EE Limited operates its network in such a way, that the radio frequency power outputs are kept to the lowest levels to commensurate with effective service provision. The proposed telecommunications infrastructure, which is 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.		

5. Technical Justification

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

Purpose of proposed works

The existing EE Limited' telecommunications site is located near the junction of Guilford Street and Gray's Inn Road (A5200) in Camden, London. The existing site is a roof-top site installed on top of a mixed land-use building in Bloomsbury.

The site is an established telecommunications site, providing 2G and 3G network services to the customers in the local area. With the area being a busy commercial and institutional district, it requires the need for a faster network connectivity and speedy access to data. This application submission is purely with an objective to upgrade the existing site, in order to add 4G technology to the existing site.

The proposed development involves the installation of 3 no. additional antennas, fixed on proposed offset brackets, mounted on the wall. The proposed new antennas are required in order to add 4G technology to the existing 2G-3G site. There was no means of achieving the required technology upgrade, without adding new antennas to the existing site. The proposed antennas will be fixed at the same location and height as the existing ones and coloured to match existing brickwork.

As the proposed works constitute upgrade of an existing site, it omits the identification of any other sites in the area. This is consistent with the government policy, as set out in NPPF, which seeks to keep the number of base stations to the minimum.

The proposed development is part of a nationwide network integration and upgrade project being rolled out by our client 'EE Limited'. The location of the site has been highlighted in the following figure, for your reference.

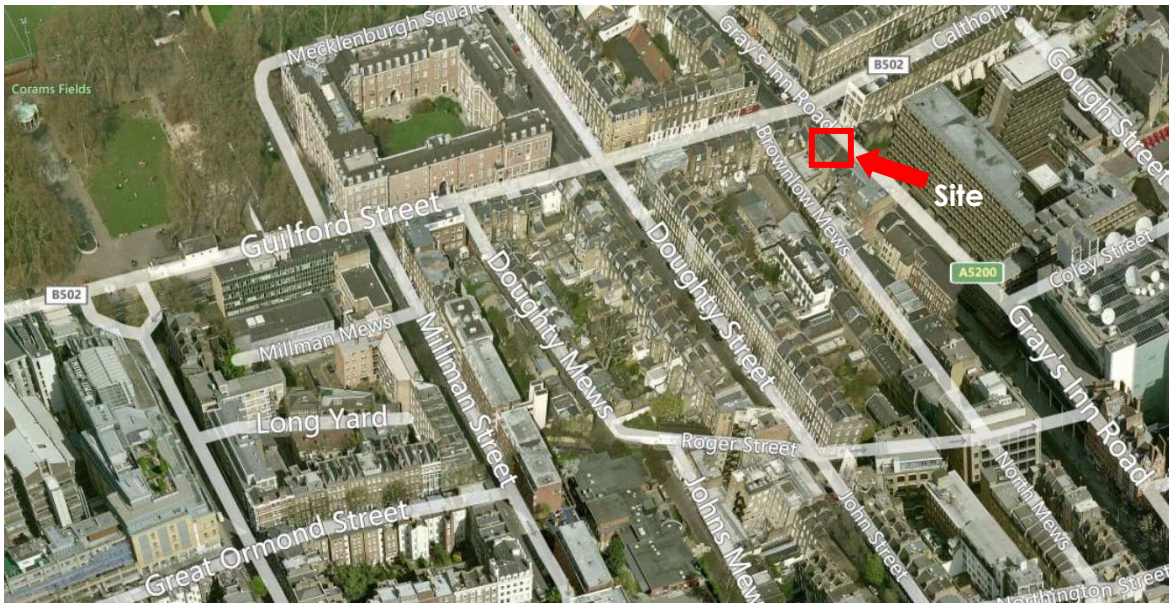

Fig. 3: Location of site [Coordinates – E 530811, N 182253]

6. Site Selection Process – alternative sites considered and not chosen

If no alternative site options have been investigated, please explain why: No alternative site options have been investigated as the works proposed are the necessary upgrade of an existing site.
Additional relevant information:

SUPPORTING STATEMENT

This statement forms part of an application on behalf of 'EE Limited'. It has been prepared in accordance with the requirements of Section 42 of the Planning and Compulsory Purchase Act 2004 which requires the submission of a Design and Access Statement to accompany planning applications.

As an electronic communications network operator, EE Limited has the benefit of permitted development rights under Part 24 of Schedule 2 to the Town And Country Planning (General Permitted Development) Order 1995, as amended by the Town And Country Planning (General Permitted Development) (Amendment) (England) Order 2001, The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013 and the Town and Country Planning (General Permitted Development) (Amendment) (No.2) (England) Order 2013.

This is an application for a determination as to whether the prior approval of the Authority will be required to the siting and appearance of the development.

The Application Site

The existing 'EE Limited' telecommunications site is located near the junction of Guilford Street and Gray's Inn Road (A5200) in Camden, London. The site is a roof-top telecommunications site, situated on top of a mixed land-use building. The building is just within the demarcated boundaries of the Bloomsbury Conservation Area. Bloomsbury is widely considered to be an internationally significant example of town-planning because of its original street layouts interspersed with landscaped squares in between. Today, the area is influenced by major institutional uses that established themselves and developed over time.

The buildings surrounding the site are primarily mixed land-use, commercial and institutional buildings. The telecommunications site currently comprises of 3 no. antennas painted to match existing brick work, 5 no. equipment cabinet units within internal equipment room at basement level, plus ancillary works.

The location of the site is highlighted in the following figure:

Fig. 4: Location of site [Coordinates – E 530811, N 182253]

Whilst forming part of the Bloomsbury Conservation Area, the building over which the site is situated, is a mixed land-use building. It is not by itself deemed to be a structure of great architectural value. The wider area, however, is home to a number of interesting structures of notable architectural importance. Gray's Inn Road has a more varied character than the quieter side streets with a coarser grain where piecemeal development has occurred over the 19th and 20th centuries characterised today by a mix of commercial, community and hospital uses.

Building nos. 3 to 7, to the north of site, are Grade II Listed terrace of five houses. Though primarily the building's façade is made of darkened yellow stock brick; building no. 3 is painted while building no. 6 is stuccoed. The buildings are three-storeyed with attics and basement with round arched doorways and gauge brick flat arches to recessed sash windows. Building no. 121 and attached railings, to the south of site, is a Grade II Listed terraced house, which was formerly a shop. It's an early 19th century building four-storeyed building with round-arched recessed doorway, radian fanlight and an original bowed shop window.

Building nos. 2 to 24, to the north-east of site, are Grade II Listed terrace of twelve houses. An early 19th century cluster of houses, the building is four-storeyed and significant for its multiple architectural features. Charles Dickens House, to the west of the site, is a terraced house with darkened stock brick façade and slate mansard roof and dormer. This house was between 1837 and 1839 the home of Charles Dickens and is now a house museum and Grade I listed.

There are many other prominent structures in the nearby vicinity, especially on Guilford and Calithorpe street, which date back to early 18th century and are terraced houses.

Site Design and Appearance

The proposed antennas, coloured to match existing brickwork, would enable improved 2G, 3G and 4G coverage in the local area. The principal objective of the proposed development is to provide 4G coverage in the local area. The proposed development comprises the installation of 3 no. additional antennas.

The proposed antennas will be visible from Gray's Inn road, as one faces south. However, the antennas are proposed to be painted to match the existing brickwork. This technique will help in camouflaging the antennas to match the wall façade they are mounted on, thereby reducing the visual impact caused by them to on-lookers. The proposed antennas will be fixed at the same height as the existing ones.

The development has been designed, keeping in mind, to reduce the visual impact and to foster effective 4G network coverage. Other minor ancillary and electrical works are proposed in order to accommodate the additional antennas, as detailed in the attached drawings.

For effective transmission purposes, there was no other alternative possible in terms of its position. The antenna by itself is of a light-weight type and similar in size to the existing ones, than those commonly used by telecom operators in the area. The installation would not bring about any clutter or significant change to the existing façade of the building. It will also not detriment the surrounding amenities.

Overall, it is observed that the proposed development will serve as an excellent compromised solution to add 4G coverage to the existing site alongwith minimizing the

obtrusiveness of the proposed antennas, thus serving the purpose of positively benefiting the local customers in Bloomsbury Conservation Area.

Possible Electrical Interference

We can advise on behalf of our clients that the proposed installations should not cause any undue electrical interference for nearby residents. EE Limited operates within radio frequency bands which are licensed and specific to them, and this is regulated in the UK by the Office of Communications (Ofcom).

Health and Mobile Phone Base Stations

The Mobile Phones and Health Report (2000), by the *Independent Expert Group on Mobile Phones* under the chairmanship of Professor Sir William Stewart (the *Stewart Report*) concluded that "the balance of evidence indicates that there is no general risk to the health of people living near to base stations on the basis that exposures are expected to be small fractions of the guidelines".

The Stewart Report recommended that, as a precautionary approach, the *International Commission on Non-Ionizing Radiation Protection* (ICNIRP) guidelines for public exposure be adopted in the UK. In response to the report, Government has stated that emissions from base stations should meet the ICNIRP guidelines and that if they do then local authorities need take no further action.

One of the recommendations of the Stewart Report was to establish a research programme to address uncertainties regarding mobile phone base stations and health. This programme was called the Mobile Telecommunications and Health Research (MTHR) Programme. The final report from this programme was published in February 2014. The report noted that the research conducted found no evidence of biological or adverse health effects from the radio waves produced by mobile phones or their base stations.

In June 2011 the World Health Organisation (WHO) noted that

> *"..A large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have been established as being caused by mobile phone use.."*
>
> WHO factsheet 193: Electromagnetic fields and public health: mobile telephones

In April 2012 the Health Protection Agency's independent *Advisory Group on Non-ionising Radiation* (AGNIR) published a report entitled "Health Effects from Radiofrequency Electromagnetic Fields". This report concluded that there is no convincing evidence that mobile phone technologies cause adverse effects on human health. In addition, AGNIR found that although a substantial amount of research has been conducted, there is no convincing evidence that RF field exposure below the internationally agreed guideline levels applied in the UK causes health effects in adults or children.

All EE Limited installations are designed, constructed and operated in compliance with the precautionary ICNIRP public exposure guidelines. An ICNIRP certificate is provided as part of this application.

Noise

There will be no noise issues related to this site.

Planning Policy Framework / Development Plan Policy

Whilst making the transition to a Local Development Framework policy structure, the most relevant development plan currently guiding development in the City of Bradford Metropolitan District Council area are the policies mentioned in Replacement Unitary Development Plan for the Bradford District - Policy Framework, adopted in October 2005.

A) Telecommunication Policies

Policy 4.11 Encouraging a Connected Economy from London Plan 2011 states:

'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.'

B) Other Policies

As the proposed works are to take place within a Conservation Area, it will be instructive to refer to policies Policy DP25: Conserving Camden's heritage from the Camden Development Policies 2010-2025, which states:

'*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.'

Policy DP26: Managing the impact of development on occupiers and neighbours from the Camden Development Policies 2010-2025, states:

'The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors we will consider include:

a) visual privacy and overlooking;
b) overshadowing and outlook;
c) sunlight, daylight and artificial light levels;
d) noise and vibration levels;
e) odour, fumes and dust;
f) microclimate;
g) the inclusion of appropriate attenuation measures.

We will also require developments to provide:
h) an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;
i) facilities for the storage, recycling and disposal of waste;
j) facilities for bicycle storage; and
k) outdoor space for private or communal amenity space, wherever practical.'

Policy CS14: Promoting high quality places and conserving our heritage from the Camden Core Strategy 2010-2025 states:

'The Council will ensure that Camden's places and buildings are attractive, safe and easy to use by:

a) requiring development of the highest standard of design that respects local context and character;
b) preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;
e) protecting important views of St Paul's Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting important local views.'

Evaluation

The proposed works are the most minor possible whilst allowing for the upgrade of the existing telecommunications site, from a 2G-3G only site to a 2G, 3G plus 4G site. The technical need for the installation having been explained in this application, it is purely intended to improve the service provision for the local customers of 'EE Limited'.

With reference to Policy DP25, the proposed development intends to preserve the existing character of the Conservation Area, through the medium of painted antennas in order to match the existing brickwork of the building. In accordance with the conservation area appraisal, the existing building is not considered a significant building and therefore the impact should be considered minimal.

With reference to Policy DP26, the proposed development does not cause harm to the surrounding amenities in terms of visual privacy and overlooking, overshadowing, sunlight and daylight, noise and vibration levels, fumes and dust and the microclimate.

With reference to Policy CS14, the proposed development preserves the setting of the existing Conservation Area and the nearby Listed Buildings, by not impacting them detrimentally in any manner. The proposed development also does not interfere with the protected view along St. Paul's Cathedral and Palace of Westminster and other local views.

The result of the proposed works will be the installation of 3 no. additional antennas, plus ancillary works necessary to effectively upgrade the site to 2G, 3G & 4G. It is measured that the works shall have negligible overall visual impact upon the Conservation Area or the

setting of nearby Listed Buildings, considering the long-term benefits that the upgrade project may bring to the area in terms of enhanced 2G, 3G plus 4G connectivity. In summary, it is felt that the proposed upgrade is in full compliance with local planning policies governing the development of telecommunications installations.

National Planning Policy

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.

Paragraph 14 advises that authorities should:

"Positively seek opportunities to meet the development needs of their area [as part of plan-making];

Meet objectively assessed needs unless the adverse effects would significantly and demonstrably outweigh the benefits."

Paragraph 17 advises that:

"Planning should proactively drive and support sustainable development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs."

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.*"

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*".

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.*"

Paragraph 64 states:

"Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions."

The proposal is supported by the guidance in paragraph 65 of the NPPF, which states 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 (unless the concern relates to a designated heritage asset and the impact would

cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits.)"

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.*"

As recommended by NPPF paragraphs 42, 43, 46 and 115, mobile phone base stations play an important part of community amenities. The proposed works meet the guidelines of the International Commission on Non-ionising Radiation Protection (ICNIRP). An ICNIRP certificate has been attached with the application, in this regard. Other sites have not been identified as it is an upgrade of an existing base station. The proposed works are of a minor nature and do not cause any harm to the character of the Conservation Area. It is therefore considered, that the proposed development fully adheres to the guidance contained within the NPPF.

Code of Best Practice on Mobile Network Development

The *Code of Best Practice* (first published November 2002, revised July 2013) is produced jointly by all Mobile Phone Operators and representatives of Central and Local Government. 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.

Though the Code is a non-statutory document, as it was prepared jointly by representatives of central and local government and the mobile phone industry, it is considered to be a material consideration in this case.

General siting and design principles for all telecommunications installations are provided in Appendix B of the Code. The principles exist subject to the following variables:

> "*..site conditions, technical constraints, landscape features and coverage and capacity requirements*".

Appendix B echoes the NPPF's emphasis on the re-development or sharing of existing telecoms sites as a means of reducing the number of such sites to the minimum consistent with the efficient operation of the network.

In addressing the re-development of sites upon rooftops (or other structures) Appendix B provides a series of design *aims*. With respect to the proposed scheme these include:

> *Keep in proportion to the building or structure;*
> *Respect architectural style;*
> *Have minimal impact above the roof line commensurate with technical constraints;*

Not be detrimental to important views and skyline;
Avoid creating clutter;
Use clean lines and maintain symmetry
Be painted to correspond with the background or to reduce contrast.

In summary, the planning application submitted herewith fully embraces both the voluntary and compulsory good practice principles contained within the Code.

Conclusions

National planning policy aims to facilitate the growth of new and existing telecommunications systems and operators have obligations to meet customer demands for improved quality of service. This application details the technical need for the replacement and installation of apparatus, to provide improved customer service for customers of EE Limited.

EE Limited has identified that this upgrade is required to improve the service provided and to meet the demands of customers in this area. 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 the National Planning Policy Framework as defined above.

For the reasons set out above in the report, we consider that this application should be approved.

RELATED DOCUMENTS

The following documents may be of assistance in determining this application:

- NPPF (March 2012)
- Code of Best Practice on Mobile Phone Network Development – www.odpm.gov.uk
- Office of Communications (Ofcom) – www.ofcom.org.uk
- Camden Core Strategy 2010-2025 [Local Development Framework]
- Camden Development Policies 2010-2025 [Local Development Framework]
- Bloomsbury Conservation Area Appraisal and Management Strategy [Adopted on 18 April, 2011]

Contact Details

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