SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	New Penderal House	Site Address:	New Penderal House, 283 High Holburn, Holburn, London, WC1R 5DJ
National Grid Reference:	E530862, N181571		
Site Ref Number:	CTIL 13733922, TEF 4868, VF 80449	Site Type:[1]	Macro

2. Pre Application Check List

Site Selection (for New Sites only)
(Would not generally apply to upgrades/alterations to existing sites)

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	**No**
If no explain why: n/a upgrade of existing site		
Was the industry site database checked for suitable sites by the operator:	Yes	**No**
If no explain why: n/a upgrade of existing site		

Annual Area Wide Information to local planning authority

Date of information submission to local planning authority	13.10.2015
Name of Contact:	Gavin.Polkinghorn@camden.gov.uk
Summary of any issues raised:	List of existing sites and general rollout at that time within the authority.

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	07.03.2016	
Was there pre-application contact:	Yes	**No**
Date of pre-application contact:		
Name of contact:		

Summary of outcome/Main issues raised:

A pre-application consultation email was sent to the LPA on the 07.03.2016 which included site-specific draft drawings and outlined the need for the existing telecommunications base station to be upgraded and redeveloped. To date no comments have been received.

In an email dated 08.03.2016 the LPA advised that there is a charge for providing pre-application advice. Therefore, it was considered that when balancing the fees of the LPA for informal advice, together with those incurred for a formal determination, the proposal subject to this application would be advanced.

Although no LPA comments have been forthcoming, as the proposal relates to the upgrade of an existing base station and the principle of telecommunication development is established on-site, it was considered appropriate to progress this application and seek the LPA's formal determination.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red	Amber	**Green**

Outline Consultation carried out:
A pre-application consultation email was sent to the ward councillors on 07.03.2015 which included site-specific draft drawings and outlined the need for the existing telecommunications base station to be upgraded and redeveloped.

[1] Macro or Micro

Summary of outcome/Main issues raised: To date no comments have been received.

School/College

Location of site in relation to school/college *(include name of school/college):* No school or college were considered to have a direct of functional relationship with the site.
Outline of consultation carried out with school/college *(include evidence of consultation):* N/A
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 Full Planning application		

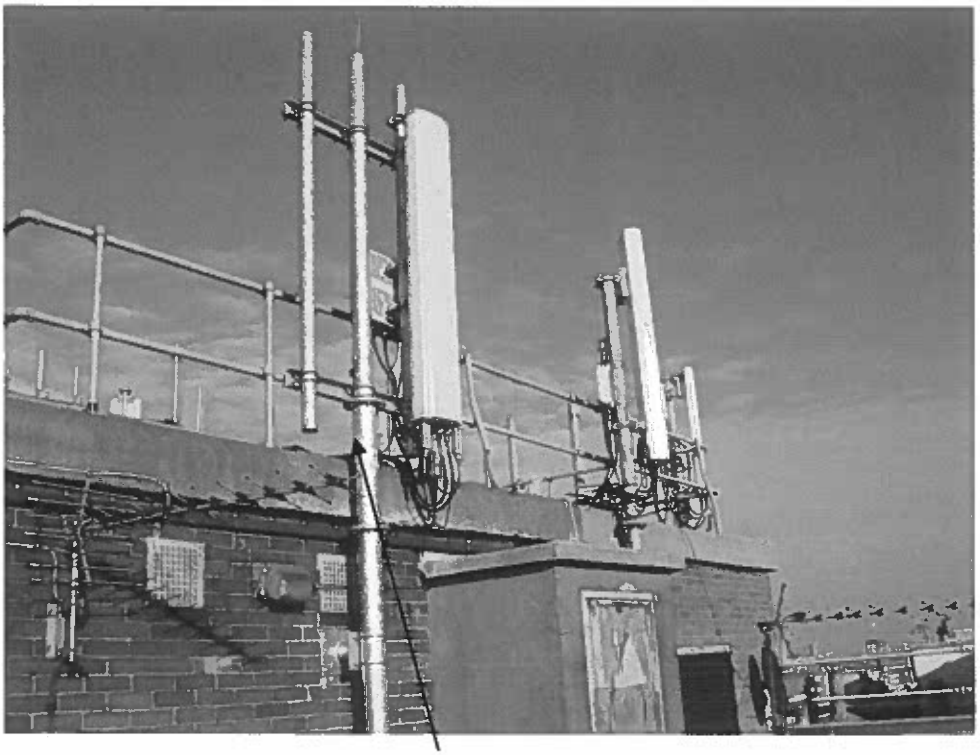
Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	No
Date served:		11.04.16

3. Proposed Development

The proposed site: This application relates to an existing telecommunications installation, which is found on-site. For reference please see below a photograph of the base station in-situ: -

Application site



Existing telecommunications radio base station located upon the roof of the building. Proposed antennas to be mounted upon spare antenna poles.

Enclose map showing the cell centre and adjoining cells:
n/a

Type of Structure	
Description: This upgrade proposal relates to the installation of 2no. additional antennas utilising existing spare antenna support poles. The upgrade proposal also includes the installation of 2no. RRU (Remote Radio Units).	
Overall Building Height:	26.6 metres
Overall Height:	29.3 metres
Tower/mast etc – type of material and external colour:	Galvanised steel / untreated

Reasons for choice of design:
I In this instance, the choice of design tabled in this application has been influenced by the existing base station's siting and appearance, the technologies it currently supports, most notably the added emphasis to cater for 4G coverage requirements. As part of a sequential approach to site selection, an existing base station development made available as part of the CTIL initiative was identified at this site. The proposed antennas and their positions on the building offer a technically preferred solution, in which where possible the antennas will be titled and orientated so as to provide cell specific coverage to the demands of the target area. Taking into account the existing arrangement and the character and appearance of the Conservation Area, the extent of development has been kept to a minimum. Therefore in order to meet the operator's coverage requirements, it was necessary to position the antennas in two separate locations in order to prevent the clipping of the radio signal by the host building as well as to enable the antennas to achieve their required orientations. Taking into account the existing telecommunications installation on the roof, it is considered that the upgrade proposal will have a negligible visual impact on the streetscape and skyline. The proposed antennas will be pole mounted upon the roof of the building and will maintain their manufactured grey finish given they will be viewed against the sky and will replicate the finish of the existing antennas found upon the buildings roof. Coupled with their position at height, it is considered that their visual impact will be softened and their presence is likely to go unnoticed when seen in perspective from ground level.

The proposed antennas will be affixed to the existing support poles found in north-east and south-east corners of the roofline. The proposed antennas will be left in their manufactured form and will take a similar appearance to those they replace. In this regard although the proposed antennas will be seen from wider vantage points, it is considered that the level of visual impact has been kept within reasonable bounds when taking into account the extent and visibility of the existing rooftop antennas.

In light of the above it is considered that every effort has been made to limit the visual impact of the upgrade scheme. It is considered that reasonable steps have been taken to achieve this by limiting the extent of development and grouping antennas together, in which the upgrade scheme will have a neutral impact on the host building. Accordingly, it is considered that the proposal when taking into account the siting and design of the existing rooftop base station would have a negligible visual impact on the Conservation Area, thus preserving its character and appearance.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached	**Yes**	No
International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, Telefónica UK Limited 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 Telefónica UK Limited'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.		

4. Technical Justification

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

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

It was announced in mid 2009 that the Vodafone Group were to form a strategic partnership with the Telefónica Group to share their telecommunication infrastructure assets across Europe. In the UK this project was called 'Cornerstone' as saw both Telefónica UK Ltd, commonly known as O2 and Vodafone Ltd working closely together to pool their resources and infrastructure making substantial improvements to their 2G and 3G networks. This initial agreement between the two aforementioned operators broke barriers in addressing the historical limitations encountered in conventional mast share schemes. It allowed both organisations to consolidate a number of base stations through, where appropriate, sharing each others sites and in turn significantly reducing the environmental impact of their network deployment. Although infrastructure development formed part of Cornerstone, Telefónica and Vodafone have continued to actively compete in the telecommunications market place to retain and win mobile phone customers and both operators differentiate themselves on the quality of their customer experience. Although Telefónica and Vodafone share their infrastructure, they operate entirely independently as businesses with their own separate strategies and networks. Accordingly the key focus as part of Cornerstone was to build

new sites which had the capabilities to provide coverage for both operators.

In February 2013, the Office of Communications, commonly known as Ofcom, who are the independent regulator and competition authority for the UK's communications industries announced the winners of the 4G mobile spectrum auction. 4G is the fourth generation of mobile phone technology and follows on from 2G and 3G. 2G technologies is predominately used for making calls and sending text messages, whilst 3G enables access to internet services more effectively through a mobile device. 4G services are intended to improve mobile broadband services into the future, enabling greater capacities of data to be shared via mobile technologies with speeds likely to be nearer those currently experienced via home broadband. Both Telefónica and Vodafone were awarded 4G licenses, hence they have entered into a new agreement in which the two companies now plan to jointly operate and manage a single network grid across the UK. This initiative strengthens the network infrastructure partnership between the two companies, previously rolled out as part of Cornerstone. This next phase of consolidation will primarily involve upgrading existing base stations to accommodate 4G technology and will be facilitated by Cornerstone Telecommunications Infrastructure Limited (CTIL), a newly formed joint venture company owned equally by Telefónica and Vodafone. The single grid infrastructure will enable both organisations to pool and consolidate their respective networks yet further while running two, independent, nationwide networks.

The rollout of multiple technology networks to support the growth of mobile devices has had an impact on more conventional ways of communications. Latest figures from the regulator, Ofcom, show that consumers are spending less time using their landlines in the year to June 2014, a reduction of 12.7% in one year alone. In this respect it is thought that fixed line call volumes are declining as people are using mobiles speak to each other. Also the way people communicate on mobile devices is changing as they have instant access to video calls and may choose to utilise the in-built capabilities of various messenger and social media applications.

In December 2014, Ofcom published their finding on the status of electronic communications networks and services in the UK. The Infrastructure Report 2014 acknowledges that robust telecommunication networks present vital enablers towards supporting a vast amount of economic and social activity, by both general consumers and businesses. The report provides an overview of the state of telecommunications infrastructures in the UK in terms of its coverage, capacity and reliability. In Ofcom's Infrastructure Report 2014 it suggests that fixed broadband connections are now almost universally available throughout the UK, however internet and downloads speeds can be patchy. However it is said that 18% of households do not have any home fixed line internet access at all and with about 16% of households already having no voice landline, it is apparent that mobile connectivity is a society choice that has importance.

According to Ofcom in November 2014, UK 4G speeds were more than twice as fast as 3G. However in a report of the same year compiled by OpenSignal, who studies mobile phone signal strengths, it was suggested that 4G speeds had almost halved in the past year as more people sign up to such services. In this respect, as well as providing coverage representation a base station will also provide much needed capacity to a network. Added capacity will create a reliable customers experience by reducing not-spots, call dropping and provide a more consistent mobile internet connectivity which people expect from their mobile devices whenever and wherever they are using them.

A retained base station site is required in this location in order to maintain existing network coverage and capacity, as well as catering for added multiple technologies, most notably 4G for both Telefónica and Vodafone.

Details regarding the general operation of the Telefónica and Vodafone networks can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the Local Planning Authority in understanding any technical constraints on the location of the proposed development. Supporting information can also be found in the attached CTIL document called 'Radio Planning and Propagation', which discusses how radio networks are planned, the need for height and the limitations associated with the technology.

Furthermore the new Code of Best Practice on Mobile Phone Network Development published by the Mobile Operators Association (MOA) in July 2013 explains the special operational and technical considerations, which the telecommunications industry encounters. It also details the evolution of mobile networks and discusses the implications of mobile connectivity in the 21st Century. The new Code of Best Practice on Mobile Phone Network Development explains how mobile networks function and the challenges faced in providing sufficient signal, coverage and capacity to supporting customer experiences. It is also of note that the MOA has produced a new guidance document to clarify some of the technical aspects of network development entitled 'Mobile Networks: What They Are and How They Work', August 2013.

5. Site Selection Process

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

Site Type	Site Name & Address	National Grid Reference	Reason for not choosing
n/a	n/a	n/a	n/a

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

In accordance with the operators licence obligations, NPPF and the Code of Best Practice on Mobile Phone Network Development, CTIL have reviewed existing telecommunications provision operated by Telefónica and Vodafone in the intended target area. An existing base station has been identified in which taking advantage of the CTIL agreement a sequential approach to site selection has been taken in seeking to upgrade this particular installation. Furthermore it should be acknowledged that alternative sites would have been considered by the operator and determining planning body when this now existing base station was first conceived and established on-site.

Land use planning designations:

The application site is set within an area characterised as predominantly residential with elements of commercial land use. It is also noted that the application site is found with designated Article 2(3) land, notably being set within the Bloomsbury Conservation Area.

In this regard the impact of the development, whether that be positive, negative or neutral on the site's land use designation will be considered in more detail in the Planning Assessment section of this Supplementary Information submission.

Additional relevant information (planning policy and material considerations):

Planning Policies

Local Planning Policy

It is acknowledged that the Council's approach to the plan-led system has evolved. Central Government now seek to streamline the process for the preparation and adoption of Development Plans, in which Local Planning Authorities are now required to adopt a new Development Plan in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework. The documents that provide local planning policies are referred to within the 'Local Plan', in which they describe the spatial strategy for the authority. The Core Strategy is the key document that forms the Local Plan and this is supported by various types of detailed information about the local and sub-regional matters. Once adopted decisions will be made in accordance with the Local Plan unless material considerations indicate otherwise.

In this regard, the Local Plan has now been adopted by the Council, in which there is no policy specific to telecommunications development. However, the following development plan policy is also considered relevant in this instance;

Policy DP25

"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."

National Planning Policy

National Planning Policy Framework (2012)

It is recognised that in seeking to adopt a new Local Plan and Core Strategy national guidance on the matter suggests that repetition, should be avoided thus the most up-to-date policy stance regarding telecommunication development should be taken from National Planning Policy Framework.

5 - Supporting high quality communications infrastructure
The National Planning Policy Framework (NPPF) set out Central Government's planning policies for England and how these are expected to be applied. It replaces a number of planning documents including Planning Policy Guidance 8 – Telecommunication. NPPF sets out the Central Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Pertinent to telecommunications development section 5 of NPPF sets out the Governments general overview regarding supporting high quality communications infrastructure and is stated as follows: -

"42. 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.

43. In preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.

44. 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. They should ensure that:

- *they have evidence to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*
- *they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and telecommunications services.*

45. Applications for telecommunications development (including for prior approval under Part 24 of the General

Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- *the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college or within a statutory safeguarding zone surrounding an aerodrome or technical site; and*
- *for an addition to an existing mast or base station, a statement that selfcertifies that the cumulative exposure, when operational, will not exceed International Commission on non-ionising radiation protection guidelines; or*
- *for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self certifies that, when operational, International Commission guidelines will be met.*

46. 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."

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

A new English Code of Best Practice on Mobile Network Development has replaced the original guidance document that was first published in 2002. Since the previous version, there have been significant changes in planning policy with NPPF replacing PPG8, as well as in technology and infrastructure rollout due to consolidation agreements. The planning process and tools in the new Code of Best Practice remains much the same as previous, in which the following is considered relevant in this particular case: -

The opening paragraphs of the new Code of Best Practice acknowledge the material weight that should be given to NPPF, in particular Section 5 - Supporting high quality communications infrastructure as noted above. It is noted in paragraph 3.2 that special operation and technical considerations should be taken into account in which it is stated that due to increased demands of mobile device users there will be *"the requirement to upgrade and improve networks through changes to existing sites and the development of new sites"*

It is highlighted in paragraph 7.5 and in Appendix A which sets out the operators Ten Commitments that there will always be an emphasis on site sharing. Operators will *"continue to work together to locate base stations on existing structures, and to share sites wherever viable in order to reduce the need to build new masts on which to locate their equipment and to minimise the number of base station sites in the UK."*

Appendix B discusses the general principles for telecommunications development. It is stated that "*The Government's general policy on telecommunications development is to facilitate the growth of efficient and effective telecommunication systems whilst keeping the environmental impact of such development to a minimum. The siting and design of telecommunications equipment, if undertaken with care and sensitivity, will be vital in achieving this policy aim. Good siting and design should not only be respected in environmentally sensitive areas but should also be applied to all telecommunications development. In all circumstances, the sensitivity to context of the proposed development should be considered.*

In particular, the following general design principles should be regarded as important considerations in respect of telecommunications development:

- *Proper assessment of the character of the area concerned*
- *Design should be holistic and three dimensional showing an appreciation of context;*
- *Analysis of the near and far views of the proposal and to what extent these will be experienced by the public and any residents;*
- *Proposals should respect views in relation to existing landmarks and distant vistas;*
- *Proposals should seek to consider the skyline and any roofscapes visible from streets and spaces;*
- *Choice of suitable designs, materials, finishes and colours to produce a harmonious development and to minimise contrast between equipment and its surroundings.*

The options for the design used by an operator will be affected by site conditions, technical constraints, landscape features and coverage and capacity requirements. The main options would include:

- *Mast and/or site sharing;*
- *Installation on existing buildings and structures;*
- *Camouflaging or disguising equipment where appropriate;*
- *Using small scale equipment;*
- *Erecting new ground based masts."*

Appendix B goes on and recognises that mast and site sharing is a longstanding Government policy objective. In this regard the Government encourages telecommunications operators, wherever viable, to share masts and sites as a means of minimising overall mast numbers. It is stated in Appendix B that *"If operators are able to share sites, and install more equipment on each site, this reduces the overall visual impact of network infrastructure, because even though shared sites will tend to be slightly bigger, it means that fewer sites are needed to improve coverage and capacity, infrastructure becomes more feasible, and is more cost-effective to deploy. In fact, sharing of sites is now the norm, and network operators now share much of their network infrastructure via joint venture commercial arrangements."*

Mobile Networks: What They Are And How They Work (2013)
It is highlighted that the new Code of Best Practice is supplemented by a document titled 'Mobile Networks: What They Are And How They Work'. It explains the main factors that affect radio signals such as shadowing, attenuation, diffraction and reflection. In this regard it should be appreciated that antennas need to be sited with the clearest possible view of the area for which they are intended to provide coverage. It is stated that *"there are various reasons that can lead to the need for new cell sites. Two main ones are the need for additional coverage and capacity. Other factors that can lead to the need for new sites include the introduction of new technologies and services; new property developments in an area requiring new coverage or additional capacity; or redevelopment of an area requiring existing sites to be replaced."*

London Plan (2015)
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. In Paragraphs 1.38-1.41 *'Ensuring the infrastructure to support growth'*, the London Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that the city requires to secure its long-term growth. Such matters are further echoed by the Mayor's Offices long term strategy as documented in the London Infrastructure Plan 2050.

It is considered that the Telefónica and Vodafone networks are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the 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 London Plan. Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform in allowing Vodafone and Telefónica to provide additional 3G and 4G coverage to the surrounding area.

The aim of the Infrastructure Plan is to enable for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 of the Plan indicates how the London Mayor's Office shall support an economically viable mix of technologies including fibre broadband, mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. This document is supported by the report Raising London's High Speed Connectivity to World Class Level. As detailed within these Digital Connectivity is now considered the fourth utility. Internet access not only affects the productivity of businesses and proves essential to the future growth of many firms, it is also vital for many residents to take part in modern society as more services move online.

The Mayor's Office shall work with central government and London's local authorities to ensure that strategic communication networks are enabled rather than inhibited by the planning and other regulatory systems whilst ensuring the utility works themselves are properly managed.

The Telefónica and Vodafone networks are integral elements in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

Planning Assessment
From the outset, it should be appreciated that irrespective of the installation's use as a telecommunications base station, its change in form will always be, to some degree, a noticeable alteration to those residents and regular passers by found closest. However it should be recognised that visibility or a development's siting and appearance within the context of a sensitive designation, most notably in this instance the site being found within a Conservation Area does not automatically result in an overwhelming adverse harm. Similarly, it should be acknowledged that the presence of the existing telecommunications installation on-site may result in a number of preconceptions regarding the new proposal now subject to this application. In reflection it should be appreciated that these opinions may actually derive from the previous planning history and or the siting and appearance relating to the now existing mast. Irrespective of these viewpoints and what has gone before, it should be

acknowledged that the existing base station is now established on-site, in which this provides a good reference point for the upgrade scheme's siting and appearance.

In light of the above it is considered that the planning assessment of this case should concentrate on whether the proposed changes in terms of its form when compared to the existing development are significant as to outweigh other material planning matters. Indeed it should also be ascertained as to whether there is still a need for the base station and if there have been any notable changes in terms of the site specific siting and surroundings which should be given material weight. Also the latest proposal subject to this application should be reviewed against the up to date planning policy regarding telecommunications development.

As discussed previously with regards the choice of design when comparing the appearance of the existing installation with the proposed scheme, it is considered that the upgrade development will not undermine the visual amenity of the area. The upgrade proposal has dual user capabilities whereby balanced against the other material planning matters as below, it is considered that the CTIL scheme is acceptable.

To expand upon the siting and appearance of the upgrade scheme within the context of Article 2(3) land, firstly it should be acknowledged that the principle of telecommunications is established on-site as this has been accepted by the determining planning body when they approved the original scheme in the first instance. Nonetheless the application site is found within the Bloomsbury Conservation Area, therefore in this respect the proposal has been designed sensitively to respect the historic environment. Furthermore the extent of telecommunication development in this case has been kept to a minimum and has been progressed proportionate to the asset's importance. In this regards it should be appreciated that the proposal has been designed with no more development than is sufficiently needed to fulfil the technical requirements of this site.

The existing telecommunication placed on the roof is discretely located hence comparing the existing and proposed antennas in terms of their siting and appearance, it is considered that parallel assertions should be taken. When taking into account the existing antennas which are in-situ on the roof of the building, it is considered that the position of the new antennas would not form incongruous features within the context of the host property as it would closely mirror the existing arrangement, providing an element of symmetry to the building's roofline. The antennas would be set back from the edge of the building and has been positioned on a plant room which is not distinguished for its architectural merit. In this regard, it is the applicant's opinion that the telecommunication development not appear untoward within the context of the Conservation Area. Indeed it is considered that the antennas with their grey finish would be barely noticeable to the casual glace given the context with which they would be viewed and when read against the existing grey plant rooms on top of the building. Furthermore allowing for their height above ground level and angle of perspective, it is considered that their presence are likely to go unnoticed to the untrained eye. Therefore the applicant deems that the siting and appearance of the proposed new additions would preserve the character and appearance of the Conservation Area.

In terms of siting the applicant has taken advantage of the building's tall height, whereby it is of note that the new antennas will not project above the height of the existing antennas present upon the property. In this regard the proposal will not break the silhouette of the building any further so as to undermine the character and appearance of the Conservation Area. Similarly it is considered that the rooftop base station will not appear overly pronounced within the context of host building nor the skyline given that the apparatus would be sited centrally upon the building. Whilst the 2no. proposed antennas shall be co-located next to an existing antennas upon an existing spare pole mount, thus preventing the rooftop from appearing cluttered as the equipment has been grouped together. In this respect the siting of the proposed antennas will not appear overly pronounce to the detriment of the host building and wider area.

In conclusion it is considered that when balanced against all material factors of this case, the proposal's siting and appearance will not have a significance impact on this designated heritage asset. It is clear that the telecommunications development respects the historic qualities of the site and its surroundings, whereby it would not undermine those specific features as listed that warranted the site's designation.

With regards the need for the development it has been highlighted previously that the existing base station requires upgrading to meet the existing and future demands of mobile users. Irrespective of a site designation, the public benefits of the telecommunication development in providing coverage and capacity should be seen as a material planning consideration. The use of mobile devices has become an essential part of everyday life for the vast majority of people in the UK. Indeed mobile technology is important for personal communications, but it is becoming more and more important for businesses, making a vital contribution to overall economic prosperity. In this respect the network infrastructure development progressed by the operators is largely determined by consumer demand. These customers wish to be able to use their devices wherever they are, in which in designated areas this coverage requirement is no different. Albeit Conservation Areas can present difficulties in terms of their built and natural character, it is considered that the technical needs have been addressed by taking

a responsible and sensitive approach to the siting and appearance of this base station development. In this regard it is considered that the wider public benefit of providing multiple technologies for two operators is sufficient to outweigh any undue harm to the designated asset.

It should be acknowledged that a sequential approach to site selection has been taken. The upgrade proposal will facilitate mast sharing and provide multiple technologies whereby it should be noted that it seeks to replace an existing ground based installation found at the application site. It should therefore be acknowledged that the upgrade proposal would not increase the proliferation of telecommunications apparatus within the area, as the proposal seeks to co-locate the required equipment upon a structure that already successfully accommodates telecommunications apparatus. Taking into account the context in which the upgrade proposal would be read, it is considered that this site remains an appropriate location to site a telecommunication base station. The scheme would be set on private land, in which its siting would not impact upon recognised pedestrian and vehicular movements. There are commercial properties in the immediate locality and the existing telecommunication installation subject to this application is co-located next to another operator's mast. These are all considered features and a context that would help assimilate the base station's change in form into this particular environment. In light of the above, it is considered that the upgrade proposal would not be overly intrusive in this particular environment. Taking all matters into account, it is the applicant's opinion that the visual impact as a result of the proposed changes would not outweigh the other material merits of this case.

It is recognised that the existing base station was determined prior to the adoption of the aforementioned National Planning Policy Framework. NPPF, in particular Section 5, should now be given significant weight especially as there are general moves away from locally based telecommunications policy. Nevertheless it is evident that the guiding factors of telecommunications policy have not altered significantly since the existing mast was established on-site and the key material considerations are deep rooted in planning policy. In this regard it is reasonable to presume that NPPF has derived from PPG8 which was applied in the first instance. As previously highlighted the Code of Best Practice on Mobile Network Development has updated and is more reflective of today's current practices. Therefore it is considered that there is limited material conflict between the latest adopted national planning policies used today when compared to the policy context that has gone before. Similarly taking into account the local planning policies which are now applicable, it is considered that the upgrade proposal accords with the Council's Development Plan.

In light of the case presented above, the applicant considers that the upgrade 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 planning system. That said the weight to be attached to this issue has to be determined accordingly in each case by the decision maker. However it has been generally upheld 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 base station will comply with the International Commission on Non-Ionizing Radiation Protection 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 and determining 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. Telefónica and Vodafone as well established operators are committed to ensuring that all new and upgraded installations are ICNIRP compliant. In this regards there should be 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. As previously noted in this submission statement the ICNIRP declaration takes into account the cumulative effect of the emissions from the proposed upgrade installation and all radio base stations present, at or co-located near to the proposed installation. Albeit the upgrade proposal has dual user capabilities and seeks to provide multiple technologies the radio frequency emissions from the proposed development 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 health and safety concerns should not be so great as to warrant a refusal of the case on these grounds.

Contact Details

Name: (Agent)	Dominic Needham	Telephone:	0161 214 1742
Operator:	Telefónica UK Limited	Fax no:	0161 839 8840
Address:	Mono Consultants Ltd Steam Packet House 76 Cross Street Manchester M2 4JG	Email:	dominic.needham@monoconsultants.com
Signed:		Date:	11.04.16
Position:	Town Planner	Company:	Mono Consultants Ltd
		on behalf of CTIL & Telefónica UK Limited	