

UPGRADE OF TELECOMMUNICATIONS INSTALLATION

FOR

MBNL & EE LIMITED

AT

Existing Installation, Land at the junction of Melton Road &

Euston Road,

London

WC1H 0DS

SUPPORTING STATEMENT

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Prepared By

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MBNL REF: Cell Number 14616

1. Introduction

This statement is in support of a Prior Approval Application in respect of a proposed upgrade of an existing base station installation. The scheme is considered relatively minor, thus this statement is necessarily brief.

2. The Proposal

This scheme plans a simple upgrade of an existing base station, by way of the installation of 3 no. new radio equipment cabinets, and associated ancillary development. The works will represent a minor change to the existing installation. Other than some minor ancillary works, no other development is proposed.

3. The Application Site

The existing installation consists of antennas within a National Rail and London Underground sign with a single radio equipment cabinet to the north of the site adjacent railings. The site is sited on a wide pavement area at the junction of Melton Street and Euston Road. The site is located at the southern corner of Euston Square Gardens. Other than the current installation there is a significant amount of street furniture in the area, including street lighting, traffic lights and equipment cabinets. Along with substantial trees in the area, these elements ensure the existing installation has a minimal impact on the area.

The site is located within the Bloomsbury Conservation Area. The closest listed buildings are across Melton Street to the west, and across Euston Road to the south-east. It is considered the existing installation does not harm the setting of these buildings due to the distance involved and because there are busy roads between the buildings and the equipment.

4. Pre-Application Consultation

A pre-application e-mail was submitted to the planning department of Camden Council on 9 December 2016. A response was received on 9 December confirming a fee of £960 would be payable to receive pre-application advice. Due to the time and cost involved, and the minor nature of the proposed works, it has been decided to proceed directly to a formal application.

5. Application Background

The existing site and installation has been established for some years. As above, the site has been utilised for telecommunications purposes for some significant time.

6. The Need for the Proposal

This scheme represents a simple upgrade of an existing site in order to provide improved capacity, coverage and to expand EE's 4G services. This can be done by simply adding cabinets at a location that is an established telecommunications site, together with some minor ancillary development. This is clearly preferable to the deployment of a new site or installation to provide enhanced coverage to the area.

It is noted there are no external changes to the sign which accommodates the antennas.

7. Site Search/Alternatives Discounted

As this is an upgrade of an existing installation, no alternative sites were realistically considered. Upgrading an existing installation is preferable to the alternative of seeking to deploy a new site or installation.

8. Design Statement

The scheme meets all relevant criteria and guidance on design in that it simply seeks to upgrade an existing installation by way of adding small equipment cabinets. This minimises impact, while at the same time complying with the operators technical and operational constraints.

The scheme consists of the addition of 3 no. small radio equipment cabinets. These cabinets would be located immediately to the north-west of the existing cabinet and is proposed to be painted grey. As the site is within a conservation area, the cabinet could be coloured to match the existing green cabinet if considered more appropriate.

It is considered the changes to the installation are minimal and not sufficient to cause harm to the surrounding area, or its Conservation Area setting.

9. Access Statement

Radio base stations are not designed to be accessible by the public. Therefore no specific public access provisions are required to be incorporated into the design of the proposal.

10. Health and Safety

We would remind the Council that the Government has set out its clear view on the issue of health and perceived view of health risks in paragraph 46 of the NPPF:

“Local planning authorities must determine applications on planning grounds. They should not...determine health safeguards if the proposal meets International Commission guidelines for public exposure.”

As above, and included within this application, EE have confirmed this installation will be fully ICNIRP compliant.

11. Planning Policy Framework/Development Plan Policy

National Guidance

The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these should be applied. The main thrust of the guidance is a presumption in favour of sustainable development. In general terms in respect of telecommunications the guidance aims to promote sustainable transport (including reducing the need to travel), build a strong and competitive economy, and seeks to secure high quality design.

Specifically, the NPPF advises that advanced, high quality communications infrastructure is essential for 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. The numbers of radio and telecommunications masts should be kept to a

minimum and, where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate (paragraph 43).

The NPPF advises specifically that local planning authorities should not seek to prevent competition between operators, and must determine applications on planning grounds (paragraph 46).

Section 12 of the NPPF seeks to ensure that while designated heritage assets are given due protection, that this should always be balanced against the benefits and importance of the proposal concerned. In particular, paragraph 134:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal”.

It is considered the proposed development complies with the broad aims of the NPPF. It assists in the aim to keep the number of installations to a minimum, by providing enhanced coverage and capacity from an existing installation. The equipment has been sympathetically designed and it would enhance the provision of local community facilities and services. Although sited within a Conservation Area, it is considered the development would preserve Heritage Assets.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, most relevant to the proposal are the adopted Core Strategy 2010-2025 and the Development Policies 2010-2025 document. In relation to telecommunications development, neither document contains any discernible policy, thus reliance must be made on the NPPF as above.

Within both the adopted Core Strategy and Development Policies, we are conscious of policy CS14 within the Core Strategy and policy DP25 within the Development Policies document, relating to conserving the heritage assets and buildings of the borough. We do not believe that this scheme conflicts with these aims as:

- Local character and context will be unharmed;
- The scheme will have no material, or discernible impact on the history, character or architectural features of the listed buildings close to the site;
- The specific design and location employed in this case, ensures that the main historical and architectural elements of the area remain untouched.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy the proposal is sympathetically designed, it minimises the number of installations and

has a high quality of design. It would enhance the provision of local community facilities and services.

12. Conclusions

There is a requirement for EE to provide enhanced and improved network coverage and capacity in this locality, together with the need to provide for expanded 4G services. Network planners have identified a need for improved coverage and the proposed development will address this identified need and continued requirement in line with their licence requirement and customer demands.

National planning policy is 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 demonstrates the technical need for the installation to provide improved customer service.

In terms of design, scale and layout, it is considered that the proposal responds positively to the character, appearance and variety of the local environment and will not have an adverse impact on the application site or the surrounding area. The upgrade is of a high standard, maintaining the visual and environmental character of the area.

The telecommunications infrastructure proposed in this application has been designed using appropriate techniques and sited, having regard to technical, engineering and land use planning considerations, in order to minimise its impact on the character and appearance of the surrounding area. The proposal represents an appropriate siting and design solution for this locality, balancing environmental and planning considerations.

PLEASE NOTE OTHER DOCUMENTS SUBMITTED WITH THIS APPLICATION AS FOLLOWS:

- Supplementary Information Form
- ICNIRP Compliance Certificate
- Planning Drawings