SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	36 Millman St	Site Address:	36 Millman Street, Holborn, London, WC1N 3EQ
National Grid Reference:	E530712 N182132		
Site Ref Number:	CTIL_147986	Site Type:	Macro

1.1 Background

The operators have been searching for a site to locate a base station in this part of Camden for many years. Currently, coverage is sub-standard. A site at 36 Millman Street will enhance the 2G, 3G and 4G coverage for Telefónica (trading as O2) and Vodafone customers in the surrounding area. 36 Millman Street is one of a series of Camden Council owned properties which has recently been made available to the operators and other infrastructure providers as part of a drive for alternative sources of revenue given reductions in central government housing funding.

2. Pre Application Check List

Site Selection (for New Sites only)
(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	**No**
If no explain why: No mast register could be found following a search on the Council's website. A further call to the Camden Planning department confirmed that no mast register exists.		
Were industry site databases checked for suitable sites by the operator:	**Yes**	No
If no explain why:		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	**Yes**/No
Date of pre-application contact:	20/12/2016
Name of contact:	Chief Planning Officer
Summary of outcome/Main issues raised: Details of the proposal including site specific drawings were emailed to the LPA for comments on 20 December 2016. In an email dated 21 December 2016, the LPA advised that a fee of £960 was required to process the pre-application inquiry further. While there is no objection to a fee for this service, in accordance with the Government advice this needs to be based on cost recovery. The requested fee exceeds the application fee by two and half times. As such it was considered appropriate to proceed directly to a formal application.	

Community Consultation

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

Outline of consultation carried out:

Details of the proposal including drawings were sent to the following parties by email on 20 December 2016;

- Holborn and Covent Garden Ward Councillors
  - Councillor Julian Fulbrook
  - Councillor Awale Olad and
  - Councillor Sue Vincent
- Keir Starmer MP for Holborn and St Pancras Constituency

In addition to this, two site notices were posted on lampposts, one on the lamppost outside the application site holding the 20mph sign, and one on lamppost number 7 at the bend in the road on Doughty Mews, on 21 December 2016, to capture the interest of anyone else who may have an interest but was not contacted directly.

Camden Council wrote directly to the residents to inform them of the proposed development.

Summary of outcome/main issues raised (include copies of relevant correspondence):

No response was received from the Ward Councillors or MP at the time of this application, nor to the site notices.

School/College

Location of site in relation to school/college *(include name of school/college):*

The following education or childcare establishments have been identified in close proximity of the application site;

- St George the Martyr Church of England Primary School, John's Mews, London, WC1N 2NX, located approximately 20m from the application site;
- Mace Montessori Nursery and School, 38-42 Millman Street, London, WC1N 3EW, located within the same residential block as the application site;
- Corams Fields Community Nursery and Corams Field Out of School Club, 93 Guilford Street, London, WC1N 1DN, located approximately 170m from the application site.

Outline of consultation carried out with school/college *(include evidence of consultation):*

Details of the proposal were emailed to the Head teacher and Chair of Governors of St George the Martyr Church of England Primary School and the Managers of the above mentioned nurseries on 20 December 2016.

Summary of outcome/main issues raised (include copies of main correspondence):

No response was received at the time of the application.

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:	Article 13 notice for full planning application served 07/03/2017.	

3. Proposed Development

The proposed site:
The application site is part of a four-storey residential block which fronts Millman Street. The face of the building is made of a hard, stack-bonded red brick at upper floor level, with render at street level, light wells with railings and a recessed fourth floor. The building has a complex roof with varied roof levels. Part of the proposal would be sited on the recessed roof above the main entrance of the building. The rooftop has twin projections to the rear which form water tank rooms. Surrounding the subject site are predominately residential properties with some school properties and commercial units. Opposite the site to the west is a four storey residential block also facing onto Millman Street. To the east are residential properties fronting Doughty Mews. To the north and south are residential properties. St George the Martyr Church of England Primary School is located south east of the site. The application site is part of the Bloomsbury Conservation Area.

Enclose map showing the cell centre and adjoining cells if appropriate:
Please refer to attached coverage plots.

Type of Structure *(e.g. tower, mast, etc):* Pole mounted antennas behind GRP screens	
Description: The proposal involves the installation of 9no. antennas and 3no. 300mm diameter dish antennas behind glass fibre reinforced plastic (GRP) matching screening on the top of the water tank rooms and installation of 5no. equipment cabinets on the main rooftop on top of the communal stairwell and ancillary works thereto.	
Overall Height:	19.10m to top of GRP enclosure
Height of existing building *(where applicable): Due to varied roof levels building height is given at the point of installation only*	17m to top of tank room and stairwell (antenna location) 11.20m to top of main roof (cabinets location)
Equipment Housing: FlexiPack Frame x2, ERS Rack x1 and RRU Rack x1	

Length:	0.750 Metres
Width:	0.600 Metres
Height:	1.980 Metres
Equipment Housing: CSC	
Length:	0.800 Metres
Width:	0.660 Metres
Height:	1.770 Metres
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Antenna screens made of glass-reinforced plastic colour coded to match external appearance of tank room and stairwell.
Equipment housing – type of material and external colour:	Steel coloured grey (RAL 7035)

Reasons for choice of design, making reference to pre-application responses:

The proposed design has been influenced by the need to provide 2G, 3G and 4G coverage for Vodafone and 3G and 4G coverage for Telefónica in this area of Central London.

The extent of development has been kept to its minimum and the equipment proposed sited at the rear of the building to minimise visual impact. The proposed antennas are required to emit the necessary radio signals and would be fixed onto the roof of the tank rooms using support structures in the form of poles. 3no. dishes are required to provide the site with a link into the network. Their size at 300mm each has been limited to the minimum required for operational efficiency. The dishes would be fixed to the antenna support poles respectively. 4no. antennas and 1no. dish would be pole mounted on the northern water tank room. 5no. antennas and 2no. dishes would be installed on the southern water tank room. The antennas and dishes at the two locations will be contained within 2.1 metre high GRP enclosures which would ensure that the impact on the building and surrounding area is minimised. The two GRP enclosures will be colour coded to match the external appearance of the water tank rooms at the point of installation.

The overall height of the antennas is the minimum required to meet the technical requirement of the site. It should be highlighted that the antennas need to be installed at a height that clears surrounding clutter to allow for the effective propagation of radio signals. In addition, it should be noted that the new installation must have a line of sight to one of the operators' existing sites in the area to achieve a radio connection with the network. The proposed antenna height would ensure that the required radio coverage is provided to the surrounding area and enable the site to be connected to the network.

The proposed equipment cabinets are less than 2.5m^3 each and will be located on the main roof level at the top of the communal stairwell at 11.20 metres AGL behind two existing flues. The cabinets will enable the required signals to be generated. A small electricity meter cabinet will also be placed at ground level adjacent to the building, east of the bin store entrance in order to power the facility. The proposed submain cable will run up the building in a steel conduit to the distribution board on the roof so will not be visible outside the building. The cabinets will be painted grey and their siting away from the roof edge would ensure they will not be visible in street views.

The size of all components has been kept to the minimum required for efficient operation of the site and the overall scale of the proposals is considered wholly appropriate in the context of its immediate surrounds.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)* 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 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 Telefónica UK 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.	**Yes**	No

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

The proposed site is required to provide 2G, 3G and 4G coverage for Vodafone and 3G and 4G coverage for Telefónica in this area of London.

2G technology is predominately used for making calls and sending text messages, whilst 3G enables access to internet services more effectively through a mobile device. 4G is the fourth generation of mobile phone technology and follows on from 2G and 3G. 4G services are intended to improve mobile broadband services into the future enabling ultra-fast speeds when browsing the internet and greater capacities of data to be shared via mobile technologies.

The importance of mobile technology in the UK, and its contribution to the sustainability agenda is emphasised in a series of annual communication market reports published by OFCOM, 'The Communications Market' (http://stakeholders.ofcom.org.uk/market-data-research/market-data/communications-market-reports/cmr16/). The 2016 report states:

'*The communications market plays a crucial role in the lives of citizens and consumers, and the fast-paced nature of the market means that this role is ever-changing. We all need high-quality communications. In the modern world, a huge amount of our time is spent using communications services: for work, to stay in touch with family and friends, and in order to go about our daily lives. Our ability to access and use reliable mobile and broadband connections has become fundamental to the way we work and live, and to the ability of businesses of all sizes to thrive. For many people, internet connectivity is now as essential as gas or electricity, and access to traditional television, radio, fixed phone lines and postal services continue to remain important.*

4G take-up has increased to 48% of UK adults (from 30% in 2015) while 4G mobile services are now available to 97.8% of UK premises. And 37% of fixed broadband connections are providing actual speeds of 30Mbit/s or more, up from 30% in 2014. In total, 86% of UK adults now have internet access at home. The greater choice of where and how to access the internet is driving greater use of online services. The smartphone, in particular, is becoming an ever more important device for many consumers, and take-up of this device has increased again this year. Seventy-one per cent of all adults now own a smartphone, up from 66% in 2015.

The growth of 4G has been rapid. 4G mobile services are now available to 97.8% of UK premises (outdoor coverage from at least one operator) in June 2016. 4G accounted for almost half of all mobile subscriptions (46%, 39.5 million connections) in Q4 2015, compared to 28%, 23.6 million, in 2014.'

In this respect the network infrastructure development progressed by the operators in this application is largely determined by consumer demand which would enable enhanced services to this area and improve connectivity for Telefónica and Vodafone service users. The coverage plots enclosed show the existing and predicted coverage to the area respectively demonstrating the need for the installation. The plots are for 3G coverage. They are the preferred form as the 3G service covers the least area; thus if 3G coverage is acceptable then 2G and 4G coverage will also be acceptable. With reference to the plots, services in the area particularly north of Guilford Street, west of the A4200 and the area surrounding Eastman Dental Hospital would be greatly improved. The site will also improve capacity in the area. This is the amount of calls and data the network can handle at any one time. Capacity which cannot be illustrated on plots, contributes greatly to the need for the site.

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.

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	Site Name and address	National Grid Reference	Reason for not choosing
Rooftop	Elm House Clerkenwell London WC1X 0BJ	530968/182141	Despite expressing initial interest in locating equipment on the building, no further response has been received from the site provider. The operators cannot compel a response from the site provider, and the need for a site remains. Without the site provider's permission to develop the land, this option could not be progressed; it was discounted on this basis.
Rooftop	200 Grays Inn Road London WC1X 9XZ	530931/182188	Despite numerous attempts, no response was received from the site provider. The operators cannot compel a response from the site providers, and the need for a site remains. Without the site provider's permission to develop the land, this option could not be progressed; it was discounted on this basis.
Rooftop	Eastman Dental Hospital 256 Grays Inn Road London WC1X 8LD	530755 182492	This option is owned by UCL, which has advised they will not allow telecoms equipment on their land or buildings. Without the land owner's permission to develop the land, this option could not be progressed; it was discounted on this basis.
	Trinity Court Grays Inn Road London WC1X 8JZ	530740/182428	The site provider confirmed they are not willing to progress the proposal at this location. Without the site provider's permission to develop the land this option could not be progressed; it was discounted on this basis.
	Byron Court 26 Mecklenburgh Square London WC1N 2AF	530673/182440	Despite numerous attempts, no response was received from the site provider. The operators cannot compel a response from the site providers, and the need for a site remains. Without the site provider's permission to develop the land, this option could not be

			progressed; it was discounted on this basis.
	222 Grays Inn Road London WC1X 8HB	530864/182268	Despite numerous attempts, no response was received from the site provider. The operators cannot compel a response from the site providers, and the need for a site remains. Without the site provider's permission to develop the land, this option could not be progressed; it was discounted on this basis.

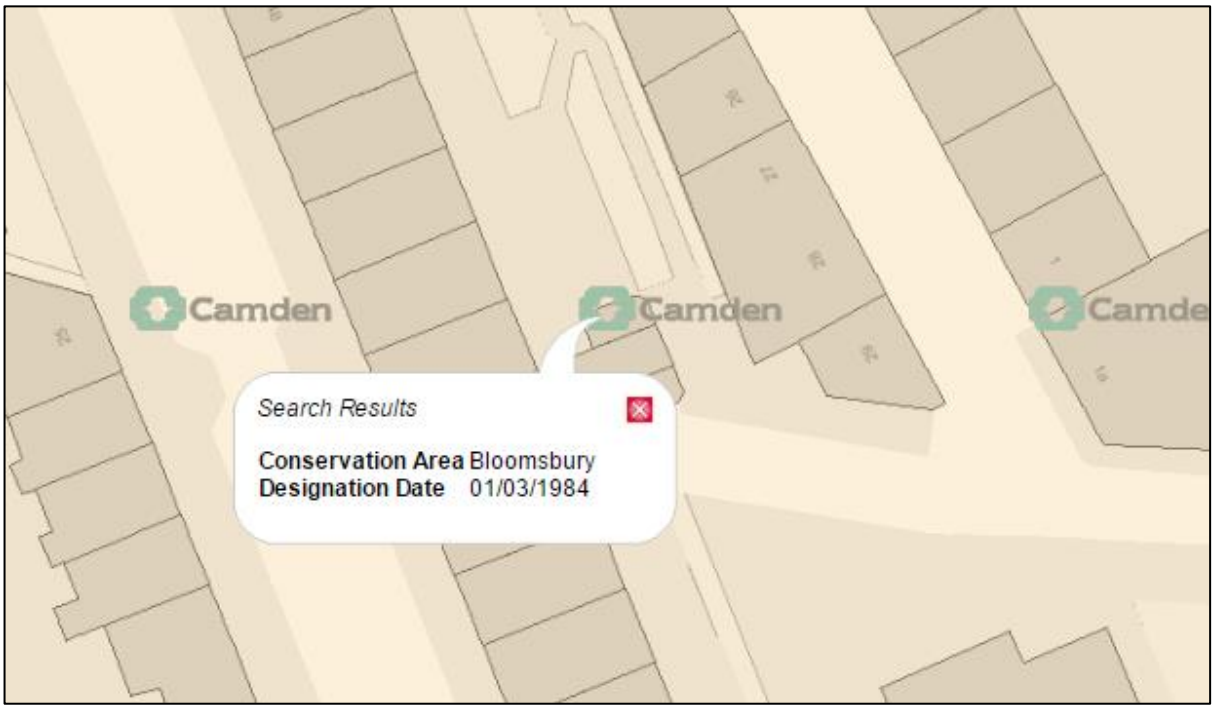
The operators have been searching for a site in this area of Camden for years. When Camden Council offered some of its property stock, it was immediately clear that 36 Millman Street was ideally located to fill a coverage gap. Given an appropriate design could be achieved which both met coverage objectives and maintained the character and appearance of the conservation area, no further searches were undertaken.

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

N/A

Land use planning designations

The below map is an extract of the LPA's LDF policies map 2016. The red flag indicates the application site. The extract confirms the site is within the Bloomsbury Conservation Area. No other designations affect the site.



Millman Street is listed as a secondary street in the "Conservation Area Appraisal and Management Strategy" in which it is stated that the street has little of historic interest other than Nos 60-62 (even), two surviving late-Georgian townhouses built in yellow stock brick. A number of listed buildings are noted in the area. The closest listed building is the Grade II listed No.2 Great Ormond Street located approximately 75 metres south west of the application site. Given the sympathetic design and siting

at the rear of the property, it is not considered that the proposal would have any significant impact on the character and appearance of the conservation area or cause any harm to the above listed building.

In this regard the impact of the development on the above land use designations together with any other material planning considerations will be considered in more detail in the 'Siting and Appearance' section of this Supplementary Information submission.

Additional relevant information (planning policy and material considerations):

National Planning Policy
It should be highlighted that any comments made in this section assessing the proposal against either national or local planning policies should be read in conjunction with the information contained within the preceding sections of this statement.

National Planning Policy Framework (2012) (NPPF)

The NPPF, which came into force on 27 March 2012, has replaced PPG8 in terms of national policy specifically relating to electronic communications development.

Paragraph 14 states '*At the heart of the planning system 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 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.*

Unless material considerations indicate otherwise.

Included within the core planning principles to be taken into account in paragraph 17 are the following relevant points:

- *planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units,* ***infrastructure*** *and thriving local places that the country needs.* …; (emphasis added)

- *always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*

- *conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;*

In this instance, the antennas would be camouflaged with GRP enclosures which would be in keeping with the building and surrounding area in line with the above core principles.

Paragraph 21 advises LPA's to '*plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries*;' and Paragraph 29 recognises that '*Smarter use of technologies can reduce the need to travel*.'

The proposed installation will facilitate enhanced 3G and 4G coverage allowing for home working and a potential reduction in the need to travel, thus contributing to the sustainability agenda. The proposal therefore complies with this aspect of NPPF.

5 - Supporting high quality communications infrastructure

Pertinent to telecommunications development section 5 of NPPF sets out the Government's general overview regarding supporting high quality communications infrastructure.

Paragraph 42 sets out 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*.'

The enhanced services that would be provided by the proposal would contribute to the above objective and towards the Government's agenda to increase connectivity required to boost economic prospects of urban and rural areas.

Paragraph 43 advises that '*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.'*

In line with this paragraph, the proposal utilises an existing building and would accommodate apparatus for two operators thereby eliminating the need for additional sites in the area. This would allow for the technical objective to be achieved with the minimal level of visual or environmental impact. Visual impact has been minimised through the appropriate siting and use of a sympathetic camouflaged design. In addition, it should be highlighted that a sequential approach to site selection has been followed and several other sites have been discounted for the reasons set out in part 5 of this statement.

Paragraph 44 emphasises that LPAs '*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*.' It sets out that LPA's '*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*

The European Commission has issued a directive (2004/108/EC) governing all forms of electronic equipment regarding the interference that such equipment produces and, in turn, its immunity to interference from outside.

The European Commission has issued a directive (2004/108/EC) governing all forms of electronic equipment regarding the interference that such equipment produces and, in turn, its immunity to interference from outside.

Any equipment compliant with that directive, such as that proposed in this application, is unlikely to suffer or cause interference. However, if there is a complaint of interference to domestic radio and television, in the first instance the BBC will assist, via the BBC Help Receiving TV and Radio web site at: http://www.bbc.co.uk/reception. If, following investigation, there is evidence of interference, the

operator will ensure any issues associated with their equipment are addressed. For any other types of interference, Ofcom will investigate.

Paragraph 45 refers to consultation, the use of existing buildings and ICNIRP. Consultation undertaken is outlined on pages two and three. The site is on an existing building in accordance with the NPPF. ICNIRP is addressed below:

Finally, Paragraph 46 clarifies that LPA's '*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.'.*

The application is accompanied by an ICNIRP declaration which confirms that the proposal conforms with the International Commission guidelines for public exposure.

It is considered that the proposal is fully in compliance with National Planning Policy guidance. The proposal represents the optimum siting option that would provide the required network coverage for the operator whilst minimising the impact on the surrounding area.

In terms of heritage assets, Paragraphs 126 to 141 contain the heritage specific policies in the NPPF which seeks to conserve and ensure enjoyment of the historic environment. It sets out how local planning authorities should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.

At paragraph 132 it states that '*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'*.

As noted previously, although it is recognised in the Bloomsbury Conservation Area Appraisal that there is some architectural variety along Millman Street, it is stated that the street has little of historic interest other than Nos 60-62 (even). In this regard any harm to the building and area should be balanced against other material considerations of the site.

The latter is echoed in paragraph 134 which states that *"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, including securing its optimum viable use."* Similarly, paragraph 135 states that '*in weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'*.

The proposal in this instance would preserve the character and appearance of the conservation area and would not cause harm to any other heritage assets. The limited impact on the building and area would be outweighed by the public benefits resulting from the enhanced services to the area.

London Plan (2015)

The theme of socio-economic benefits is further emphasised in the London Plan (2015). It is noted that the Mayor of London adopted further alterations to the London Plan (FALP) in March 2015. The London Plan continues to set out the spatial development strategy for Greater London, in which it discusses the importance of ensuring that robust infrastructure is in place so as to support better connectivity and economic prosperity. Indeed the Mayor wishes to encourage broad-based growth and continues to support the telecommunications industry towards playing its part in a thriving, resilient and diverse capital city. A range of overarching policies from the London Plan are relevant to telecommunications development, whereby the benefits of mobile connectivity should be seen as an important material consideration, in contributing to the places and spaces in which Londoners live, work and visit. In this respect it is clear that telecommunication development is an integral component towards the delivery of the Mayor's vision and objectives as set out in the London Plan.

In Paragraphs 1.38-1.41 'Ensuring the infrastructure to support growth', the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to secure its long-term growth.

It is considered that the Telefónica and Vodafone networks are an integral element in securing the Mayor's vision. 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 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 2G, 3G and 4G coverage to the surrounding area.

Other Relevant National Policy

Recognising the vital importance of mobile connectivity for residents and local economies, the urgent delivery of the required network improvements continues to be a Government priority. As recently as 9th March 2016 Prime Minister David Cameron stated:

> *'Ten years ago, we were all rather guilty of leading campaigns against masts and all the rest of it. Our constituents now want internet and mobile phone coverage. We need to make sure that we change the law in all the ways necessary, that the wayleaves are granted, that the masts are built, that we increase coverage and that everyone is connected to the information superhighway.'*

This is substantiated in the most recent budget announcement of 16th March 2016, which commits to provisions for 'greater freedoms and flexibilities for the deployment of mobile infrastructure'. This proposal forms a part of this greater drive to address the deficit in mobile phone coverage and capacity.

London Infrastructure Plan 2015

The London Infrastructure Plan 2015, further emphasises the need for improved connectivity in London. The aim of the Infrastructure Plan is to enable for fast, ubiquitous access to the internet from mobile and fixed devices. As cited in Chapter 16 of the Plan, the London Mayor's Office supports 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 documents, 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 aims to 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 Telefonica and Vodafone networks are integral elements in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposal is entirely consistent with and shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

The proposed development, which will form an integral part of Telefónica's and Vodafone's networks, is precisely the type of high-speed digital infrastructure that the government is seeking to support as part of the presumption in favour of sustainable development. Moreover, the proposal will deliver social, economic, and environmental benefits by providing 3G and 4G services to the residents, businesses and services in this area of Central London.

Local Planning Policy

Section 70 of the Town and Country Planning Act 1990 requires planning applications 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.

The Camden development plan is made up of (together with the Mayor's London Plan) a number of documents with the Camden Core Strategy 2010 – 2025 and Camden Development Policies 2010-2025 being the key documents supported by various types of detailed information in the Camden Planning Guidance and other documents about local and sub-regional matters. It is noted that the Council's emerging Local Plan has been submitted for examination and is a material consideration in determining applications.

The development plan has no policy specifically related to telecommunications development therefore the Applicant has referred back to guidance contained in the NPPF.

Other relevant policies include Policy CS14 "*Promoting high quality places and conserving our heritage*" from the Core Strategy and Policy DP24 of the Development Policies document "*Securing High Quality Design*" which requires a high standard of development, and Policy DP 25 "*Conserving Camden's Heritage*" which requires development to preserve or enhance Conservation Areas and listed buildings.

It is considered that the proposal is fully in accordance with the above policy as will be considered in more detail in the next section.

Siting and Appearance
In making an assessment of the siting and appearance of the proposal and associated visual impact, regard should be had to information previously provided in Part 3 regarding the site, surrounding area and justification for the design plus Part 5 regarding alternative sites and the relevant planning policy. It is considered that the planning assessment of this case should concentrate on whether the visual impact of the proposed scheme is significant as to outweigh other material planning matters. It should also be ascertained as to whether there is a need for the base station and whether other alternative sites exist on which the apparatus could be installed. The proposal should also be reviewed against the up to date planning policy regarding telecommunications development.

As noted previously with regards the design, the extent of development has been kept to a minimum and consideration given to the physical characteristics of the area. The omission of any one of the components would either render the base station inoperable (in the case of the equipment cabinets) or would significantly reduce the coverage provided from the site or compromise connectivity into the rest of the network (reduced antenna height) to the extent the operators may need to develop a further base station in the area to meet the coverage objectives. This would be inconsistent with government guidance, as set out in National Planning Policy Guidance (NPPF), which seeks to keep the numbers of base station sites to the minimum.

The proposal to install the antennas behind GRP enclosures would ensure that the necessary coverage is provided to the target area with minimum impact on the surrounding area. The proposal has dual user and multi-technology capabilities which would enable a series of technologies to be provided for two operators from a single installation. Therefore, progressing this scheme will eliminate the need for additional telecommunications sites in the area. Taking into account the surrounding clutter and operational needs, the antenna height is at its technical minimum to allow for adequate coverage to the target area. In this regard and when balanced against the other material planning matters, it is considered that the overall appearance of the proposal is acceptable.

The level of visual impact can be assessed in the photomontages numbered 147986.1.1 to 147986.9.1 enclosed with the application which have been produced by an independent specialist designer to illustrate the visual impact of the proposal on the streetscene and surrounding area.

Photomontage 147986.1.1 shows the existing and proposed views of the application site as seen from approximately 142 metres looking southeast from Mecklenburgh Place. The proposal would not be visible from this view point. Similarly, the proposal would not be visible when looking southeast and northeast from Millman Street and north from Rugby Street as demonstrated by photomontages 147986.2.1, 4.1 and 5.1 respectively. Photomontage 147986.3.1 shows the views of the proposal as seen from approximately 31 metres when looking east from Millman Street. The proposal would not be visible from this view point either which reveals a noticeable amount of rooftop paraphernalia (which includes a roof access ladder, TV aerials, hand railing and a satellite dish) on the building.

When looking northwest from Northington Street from approximately 140 metres (photomontage147986.6.1) and south from Doughty Mews (photomontage147986.9.1), the GRP enclosures although visible at this point, would appear as part of the building and not as standalone features given their sympathetic design and colour matching the existing building. The cabinets are not visible from these view points. The same applies when looking northwest from John's Mews (photomontage 7.1) and west from Roger Street (photomontage 8.1) except that at these view points the proposed hooped access ladders would also be visible.

Overall, the proposal would generally not be visible in street views from the west. Some views would be afforded from the east as noted above where surrounding buildings are lower however, given the built up nature of the area, long distance views would also be limited. In this regard, the impact on the area would not be far reaching and the overriding character and general appearance of the conservation area would be maintained. It is also clear that the proposal would have very little impact on the appearance of the building and certainly not one that could be considered harmful.

The Conservation Area Appraisal has little of relevance in terms of the proposed development. It mentions that there is considerable pressure for redevelopment and new development across Bloomsbury with pressure coming from a number of sources such as small scale change like roof extensions that can cumulatively have a significant impact on the character of an area. It states that "*high quality new development that is appropriate for its context can preserve or enhance the Conservation Area."* The proposal is appropriately sited on the roof of an existing building with existing hand railing, roof access ladders satellite dishes, TV aerials and flues. The proposal with its disguised design is considered will preserve the conservation area.

With regards the impact on the closest listed building No.2 Great Ormond Street located approximately 75 metres to the south west, it is not considered that the proposal would have any material impact on this building and its setting. The building faces onto Great Ormond Street and has no direct views of the subject site from its windows. Furthermore, the proposal would not be visible in street views from the junction of Great Ormond Street and Millman Street as demonstrated by photomontage 147986.4.1. When viewed from the rooftop of the listed building, the cabinets and GRP enclosures would be seen in conjunction with the existing rooftop paraphernalia. It is the Applicant's view that the proposed equipment would not have any more impact on the listed building than the existing apparatus on the roof or cause substantial harm when weighed against the public benefits of the proposal.

In relation to the need for the development, it has been highlighted that the proposed installation is required to provide 2G, 3G and 4G network coverage for Telefónica and Vodafone to this area. The public benefits of the development in providing enhanced coverage to the area should be seen as a material planning consideration. As highlighted in preceding sections of this statement, the Government fully supports the growth and provision of a modern telecommunications infrastructure. It is considered that the wider public benefit of providing enhanced services to residents and businesses in the area is sufficient to outweigh the limited impact on the surrounding area.

In relation to alternative sites, the target area has been explored for existing radio sites, buildings or other tall structures that could be used for the installation. Several alternative sites were considered during the site selection process and have been discounted for the reasons set out in Section 5 of this statement. The search area is made up of a mix of residential and commercial uses. The application

site has been identified as the optimum available option that would provide the required network coverage to the intended area whilst minimising the environmental impact on the surrounding area.

In conclusion and balanced against all material planning considerations, it is the Applicant's view that any impact on the surrounding area would not outweigh the other material merits of the proposal as well as the benefit of improved network coverage to the public. It is considered that the proposal strikes a good balance between environmental impact and operational considerations and is fully in accordance with National Planning Policy guidance and the Council's Development Plan. The proposal is fully compliant with ICNIRP guidelines and declaration of compliance has been provided.

Contact Details

Name: (Agent)	Fiona Kadama	Telephone:	01932 411011
Operator:	CTIL &Telefónica UK Ltd	Fax no:	01932 411012
Address:	Waldon Telecom Ltd Phoenix House Pyrford Road West Byfleet Surrey KT14 6RA	Email Address:	fiona.kadama@waldontelecom.com
Signed:	fiona kadama	Date:	02/08/2017
Position:	Town Planner	Company:	Waldon Telecom Ltd (on behalf of CTIL and Telefónica UK Ltd)