Town Planning Statement

Proposed Electronic Communications Base Station at Travelodge Covent Garden, 10 Drury Lane, London WC2B 5RE

Site Reference 72768

Arqiva Limited, Vodafone Limited, Telefónica UK Limited, and Cornerstone Telecommunications Infrastructure Limited

April 2019

1. INTRODUCTION

1.1 This statement is submitted in support of an application for a prior approval determination to develop a shared electronic communications base station at Travelodge's London Covent Garden Hotel. The base station, which will be managed by Arqiva, will provide mobile phone coverage for Vodafone Limited and Telefónica UK Limited through their network sharing joint venture called Cornerstone Telecommunications Infrastructure Limited (CTIL). Arqiva also manages the existing electronic communications apparatus installed on the roof of the building.

1.2 This statement includes:

- A description of the site and surrounding area
- A description of the proposed development
- An explanation of how the proposed siting and design of the development accords with National, Regional, and Local Planning policies
- A summary of the design and access considerations that have informed the proposed layout of the development.

1.3 Several other accompanying documents have been submitted in support of the application and these should be read in conjunction with this statement.

2. SITE AND SURROUNDING AREA

2.1 The application site comprises part of the roof of Travelodge's London Covent Garden Hotel, which is located within a densely developed part of central London at the corner of Drury Lane and A40 High Holborn.

2.2 The White Hart Public House and premises in retail and commercial uses line the eastern side of Drury Lane. On the northern side of High Holborn is another part of Travelodge's hotel portfolio with the London School of Economics' (LSE's) High Holborn Residence, which provides accommodation for students, adjoining the application site to the west. This pattern of mixed use commercial, retail, office, and residential uses (typically flats above retail and commercial premises) is a characteristic of the immediate area.

2.3 The eastern side of Drury Lane forms the boundary with the Seven Dials (Covent Garden) Conservation Area which wraps around the hotel and the other buildings at Drury Lane and Shorts Gardens. The application site is also approximately 60m from the closest boundary of the Bloomsbury Conservation Area at High Holborn. There are several buildings and structures included in the National Heritage List for England within a 150m radius of the hotel. The closest of these are the Grade II Listed 186 and 187 Drury Lane (opposite the hotel to the east) and the Grade II* Brownlow House and attached railings at Betterton Street (approx.75m to the south).

2.4 The hotel is a long-established telecommunications site that presently hosts a base station operated by UK Broadband as part of its communications network in central London.

3. THE PROPOSAL

The Proposed Electronic Communications Apparatus

3.1 The development proposed is shown in detail in the drawings submitted and is for an electronic communications base station that will provide improved 2G, 3G, and 4G coverage for Vodafone's and Telefónica's networks in parts of the St Giles, Holborn and Bloomsbury areas of London. The principal elements of this beneficial proposal are as follows:

- Nine pole-mounted antennas at separate locations at upper and lower roof levels

- A GPS antenna attached to one of the pole-mounts to be installed towards the northern side of the roof

- The following equipment cabinets on wall mounted steelwork attached to the plant room wall towards the northern side of the roof:

  - Two CSC cabinets, which have dimensions of 800 x 620 x 1770mm (W x D x H)

  - Two flatpack frame cabinets, which have dimensions of 750 x 600 x 1980mm (W x D x H)

- Twelve Remote Radio Units (RRUs), which have dimensions of 469 x 395 x 160mm (L x W x D), installed in conjunction with the antennas they support. These will either be attached to the proposed pole-mounts or installed on 1m high free-standing poles alongside them

- Twelve ERS units, which have dimensions of 342 x 420 x 149mm (L x W x D), in conjunction with the proposed antennas. These will be installed on either the proposed pole-mounts or on 1m high free-standing poles alongside them

- Amendments to the extent of the existing handrailing at roof level to accommodate the proposed antennas, along with installation of additional short stretches of 1.1m high handrailing where required. This will facilitate the safe means of future maintenance to the apparatus

- Ancillary apparatus, including cables on new cable trays that connect the antennas to the equipment cabinets.

3.2 The apparatus proposed is not coloured green and blue, as drawn on the submitted drawings, but has been shown this way for illustrative purposes only to differentiate from the existing antennas and other apparatus installed on the building. For ease of reference and brevity the apparatus proposed is presented on the drawings as CTIL equipment rather than as 'CTIL and Vodafone' or 'CTIL and Telefónica' apparatus. The abbreviations VF (for Vodafone) and TEF (for Telefónica) are also used on the drawings.

3.3 The respective finishes for the apparatus proposed are as follows:

- Antennas: these are made of aluminium and supplied in light grey

- Equipment cabinets: aluminium and steel construction supplied by the manufacturer in light grey

- Pole-mounts and steel grillage: made from untreated aluminium and steel that will weather to a dull grey colour

- RRUs and ERS units: aluminium and plastic coloured light grey.

The Operator's Network Requirements

3.4 Section 6 of the Code of Best Practice on Mobile Network Development in England, published in June 2016, explains how mobile networks operate. In the annual network rollout information supplied, the operators will have explained their network

requirements and the anticipated use of existing sites, including those owned by radio site management companies like Arqiva. Further information is provided in the accompanying document the '**Supporting Operational and Technical Justification'** statement.

3.5 Although the operator's networks are mature, improvements, upgrades and new sites are required for their networks for several reasons. For example, to increase capacity in an area of high demand, to provide new or improved network coverage in terms of quality as well as extent, or perhaps to provide coverage over a new development area such as a new housing estate or industrial park.

3.6 In this case, Vodafone, Telefónica and CTIL have identified a need to develop a new base station at the application site to replace an existing base station a short distance to the west near Oxford Street that is subject to a Notice to Quit (NTQ) direction from the landowner. This NTQ requires to base station to be removed with the consequential loss of coverage unless a replacement site is secured.

3.7 The proposed base station will therefore retain coverage and services in part of central London with considerable demand for mobile connectivity services from people living, working or visiting this area.

3.8 The application site has been selected by the operators as this will provide the required level of network coverage while properly meeting national town planning policy objectives for the shared use of existing electronic communications sites.

4. PRIOR ENGAGEMENT

4.1 The recently revised National Planning Policy Framework (NPPF) and the Code of Best Practice on Mobile Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the sensitivities of any given site. In this case, the proposal received a Green score when assessed against the traffic light rating model (see Appendix B of the Code of Best Practice).

4.2 As an acceptable from of development can be brought forward involving the shared use of a longstanding telecommunications site, as explained further within this statement, then formal pre-application engagement with the Council's Planning Department was deemed unnecessary. If, however, you do have detailed comments to make on the proposals we should be pleased to discuss these with you at an early stage in the determination of this application.

4.3 In accordance with NPPF guidance and the Code of Best Practice on Mobile Phone Network Development, we have written to St Joseph's Catholic Primary School, Macklin Street, London WC2B 5NA to inform the school of the proposed development and to provide the opportunity to seek further information about it. The school is approximately 135m to the east of the application site. All other educational establishments in this part of London are physically and visual remote from the application site.

5. PLANNING POLICY

5.1 The relevant planning policy and best practice framework is found principally within:

- National Policy, especially the National Planning Policy Framework (NPPF)
- The regional and local policy framework set out in the adopted Development Plan, which comprises the London Plan, the Camden Local Plan 2017 and its accompanying Policies Map, and Supplementary Planning Documents such as the Mayor's London View Management Framework SPD
- The Seven Dials (Covent Garden) Conservation Area Statement
- The Code of Best Practice on Mobile Network Development in England.

5.2 From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development.

National, Regional, and Local Support for Modern Communications Infrastructure

(a) Section 10 of the NPPF

5.3 The proposal is supported by, and accords with, national policy in Section 10 of the NPPF, which provides further guidance on the Government's objective of providing high quality communications networks in England. The NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. The accompanying document '**National Policy – Supporting Mobile Connectivity'** provides examples of the many, now well known, public benefits of mobile/wireless communications networks.

5.4 For these reasons, local planning authorities are advised to respond positively to proposals for electronic communications development and this must include an understanding of the associated special problems and technical needs of developing communications networks.

5.5 The development proposed also accords with the specific guidance contained in paragraphs 113 and 115 of the NPPF, and the Code of Best Practice on Mobile Network Development, for the shared use of telecommunications sites and the installation of antennas on tall buildings. In view of this position, and as the proposal is an acceptable design, we consider it is unnecessary to have regard to the issue of alternative sites in the determination of this application.

5.6 In support of this position, we draw your attention to the policy guidance in paragraph 115 of the National Planning Policy Framework, which deals with the sequential approach for site selection. This states that:

"115. 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:

…(c) 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 ..."

5.7 This strand of national planning policy makes clear that information on alternative sites is required only in circumstances when it is not possible to install apparatus at existing telecommunications sites or on tall buildings and other structures. As the proposal before you accords with both circumstances, information on alternative sites is not provided, or required to be submitted, as part of this determination of this application.

(b) London Plan Polices

5.8 In respect of Development Plan considerations, the role of the development in the operator's network is supported by Policy 4.11 'Encouraging a connected economy' of the London Plan. This policy states that:

"Policy Strategic

A The Mayor and the GLA Group will, and all other strategic agencies should:

a facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive connectivity meeting the needs of small and larger enterprises and individuals

b support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits."

5.9 Also having regard to the importance of ICT and mobile broadband to the London economy, the Mayor has published two further documents relevant to the application proposal: the draft London Infrastructure Plan 2050; and the report *'Raising London's High Speed Connectivity to World Class Levels'.*

5.10 As part of the work on the 2015 London Plan Alterations, the Mayor commissioned work to develop a long-term infrastructure investment plan for London, and in 2014 the *'London Infrastructure Plan 2050'* was published for consultation. One of the stated aims of the Infrastructure Plan is to enable for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 Digital Connectivity of the Plan indicates how the Mayor's Office will support a mix of technologies including 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.

5.11 These objectives are perhaps most clearly expressed in the Executive Summary of the plan, which provides the following statement:

"Digital connectivity. Our aim is for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 discusses how we will develop a map of London's connectivity, which will be used for connectivity ratings of individual properties and to identify where networks need to be improved. It sets out how we will support an economically viable mix of technologies including fibre broadband, mobile broadband and future methods of wireless internet delivery. It also discusses how we will work with Ofcom to ensure sufficient radio spectrum is identified 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."

5.12 The base station proposed fully supports the Mayor's Infrastructure Plan, as the coverage and services provided will allow, amongst others, businesses and residents in this part of the Council's administrative area to receive high-speed 4G mobile broadband internet connectivity.

5.13 The Mayor's report: *'Raising London's High Speed Connectivity to World Class Levels'* provides the background to, and amplifies, Chapter 16 Digital Connectivity of his Infrastructure Plan. The report notes the availability of internet access not only affects the productivity of businesses and proves essential to the future growth of many firms but is also vital for many residents to take part in modern society, as more services move online. It also notes among other matters, that *'Mobile operators already experience difficulty obtaining permission from local authorities…to increase capacity for their networks in areas where there is high demand'.*

5.14 The Mayor, therefore, will be working 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. As a last resort and having regard to the strategic importance of London Plan Policy 4.11, the report states:

'The Mayor has overall strategic responsibility for planning in London…The communications network of London is clearly one of strategic importance. Should the implementation of the London Plan across strategic agencies not provide the adequate flexibility for the development of a robust communications network, whether based on existing technologies or future ones, the Mayor will seek to bring planning applications for communications infrastructure within this strategic responsibility, with the ability to take them over for his own determination…'

5.15 As with the London Plan and the draft London Infrastructure Plan, the application proposal is fully in support of the objectives of Raising London's High Speed Connectivity to World Class Levels.

(c) The Camden Local Plan 2017

5.16 The Camden Local Plan does not contain a specific policy for electronic communications development. Paragraph 5.10 Digital Infrastructure of the plan does, however, contain the following statement:

"5.10 The Council recognises the importance of digital infrastructure in enterprise development and expects electronic communication networks, including telecommunications and high speed broadband, to be provided in business premises."

5.17 The proposal accords with this objective, as it will enable Vodafone and Telefónica to provide high-speed mobile broadband to the local community and the many business in the vicinity of the application site.

Heritage Considerations

5.18 Travelodge's London Covent Garden Hotel is a relatively modern, unlisted, building of concrete and brick construction located opposite the Seven Dials (Covent Garden) Conservation Area. It is also approximately 60m from the closest boundary of the Bloomsbury Conservation Area at High Holborn.

5.19 There are several buildings and structures included in the National Heritage List for England within a 150m radius of the hotel. The closest of these are the Grade II Listed nos.186 and 187 Drury Lane (opposite the hotel to the east) and the Grade II* Brownlow House and attached railings at Betterton Street (approx.75m to the south).

5.20 The Seven Dials (Covent Garden) Conservation Area Statement provides an in-depth summary of the distinctive character of the conservation area, although it makes no specific mention of the application site. This falls within Sub Area Three of the statement, which provides the following description of the Drury Lane area:

*"**Drury Lane** Predominantly four storey terraced buildings, originally domestic, now with shops at ground floor level. There is a 1980s GLC mixed use development at the corner of Stukeley Street and Drury Lane of five storeys with residential, retail and workshops, which replaced an 1880s block. Some noteworthy 19th century buildings at Nos.181,182,183."*

5.21 The general presumption in favour of allowing development for modern communications, and the special operational and technical factors that require siting of base stations within or adjoining conservation areas, and in proximity to Listed Buildings, is balanced by the need to conserve or enhance their heritage qualities.

5.22 This is reflected in the statutory duty imposed when considering applications for development within conservation areas and the related planning guidance contained in the NPPF, London Plan, the heritage protection framework provided by policies D1 Design and D2 Heritage of the Camden Local Plan.

5.23 Also relevant is the longstanding policy to minimise the potential environmental impact associated with electronic communications development by avoiding the unnecessary proliferation of sites for telecommunications development set out in the NPPF. This policy objective is backed with the statutory obligation placed upon mobile network operators to share apparatus, where practicable, under General Condition 3 (4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.

5.24 In relation to this statutory duty and the heritage protection policy framework, we have sought to minimise the impact of the development by the following means:

- The use of pole-mounts rather than a single tall rooftop stub mast to the host the antennas due to concerns that a tall mast would have greater impact

- Siting the antennas at upper and lower roof level at separate locations towards the northern, southwestern and eastern sites of the roof to spread the quantum of development across this substantial building

- Wall-mounting the equipment cabinets rather than installing them as free-standing structures.

5.25 We consider that the careful approach taken to siting and design, to together with the mitigating effects of the height of the building and perspective, will ensure that the development will preserve the overall character and appearance of the Seven Dials (Covent Garden) Conservation Area. Similarly, we consider that it would not have any impact on the setting of the Listed Buildings referred to previously due to their physical and visual relationship with the application site and the densely developed urban location in which they are set.

5.26 Even if it were not accepted that the impact on the conservation area is trivial, any harm found would clearly be ‘less than substantial’ having regard to the guidance set

out in section 16 Conserving the historic environment of the NPPF and the Government's Planning Practice Guidance.

5.27 Paragraph 134 the NPPF sets out a balancing exercise where the harm found is 'less than substantial'. This strand of national planning policy requires the harm identified should be weighed against the public benefits that flow from the development in terms of the substantial public benefits of providing adequate mobile phone coverage to the many people living, working, visiting or travelling through this part of central London

5.28 In our opinion, the weight is overwhelmingly in favour of permitting the proposed installation and it, therefore, accords with the heritage protection policy framework provided by the NPPF, the London Plan, and the Camden Local Plan

Communications Infrastructure and the Planning Balance

5.29 The UK Government recognises that we are in a communications revolution with businesses and society in general using and relying upon all forms of modern communications to an ever-increasing extent. Consequently, the overall direction of travel in both statutory regulation and planning policy in recent years is one that tips the planning balance more favourably towards supporting electronic communications infrastructure

5.30 For example, in 2013 the Government launched the Mobile Infrastructure Project (MIP) that was implemented by Arqiva. The specific aim of the MIP was to address the public disquiet in areas with poor coverage by developing with public funds new shared base stations to end this unsatisfactory situation. The MIP was ended in March 2016 after the Government changed the obligations on the Mobile Network Operators to provide coverage over 90% of the UK landmass, as distinct from the population thresholds in their previous licence obligations.

5.31 At the time the MIP was closed, the Government was under pressure to take more affirmative action to improve mobile coverage and on 9 March 2016, this exchange

(with our emphasis) took place in the House of Commons when David Cameron was Prime Minister:

"Dr Andrew Murrison (South West Wiltshire) (Con): The UK still has relatively poor superfast broadband and far too many mobile "not spots". Great work has been done, but what discussions will my right hon. Friend have with the Chancellor, in advance of next week's Budget statement, about how we can improve coverage further, particularly for rural small businesses in areas such as mine? The Prime Minister: My hon. Friend is absolutely right to raise this issue. Since 2010, we have nearly doubled the number of homes and businesses with superfast broadband. We are on track on the 90% and 95% targets, but clearly more needs to be done. This is an issue for Members across the House. 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.****"*

5.32 That exchange preceded a review of the permitted development rights granted to electronic communications code operators, culminating in the greatest extension in the rights since they were originally granted in the 1985 iteration of the GPDO. Amongst other things, the rights were relaxed to:

- Extend the thresholds on masts in unprotected areas from 15 to 25m
- Extend the threshold on masts in protected land and on highways land to 20m
- Enable existing base station infrastructure within conservation areas to be upgraded through the installation of three antennas and three dishes without prior approval, subject to size limitations
- Enable existing ground-based masts within National Parks, Areas of Outstanding Natural Beauty and other areas of protected land to be upgraded by adding additional antennas and other apparatus in line with rights in non-protected areas.

5.33 In short, there is now statutory and planning policy recognition that the needs and growing demands on mobile services are such that a greater level of impact is regarded as both necessary and acceptable.

5.34 Furthermore, the evolution of Government policy continues in the same direction as it plans for the next generation of mobile services, commonly referred to as 5G. On the instructions of Government, the National Infrastructure Commission (NIC) reported in December 2016 on how the UK should prepare for 5G. One of its recommendations was that local authorities should work together and with Local Enterprise Partnerships (LEPs) to develop coordinated local mobile connectivity delivery plans. Amongst other things, the NIC recommended that these plans should consider how the deployment of digital infrastructure can be established as a priority in local planning policy; and that town planning regulations should be examined again.

5.35 The Government has also instructed Ofcom to report on preparing for 5G and on 8 February 2017, it published a statement *'Update on 5G spectrum in the UK'*. Paragraph 2.10 of this report indicates that 5G is likely to entail an evolution of existing 4G macrocell base stations to provide the main coverage layer. This is relevant to the application proposal, as it will create a base station used by one of UK's mobile network operators and so will it will be key towards the easy and early transition to 5G services in London when available. This is anticipated in 2020.

5.36 In March 2017, the Government published *'Next Generation Mobile Technologies: A 5G Strategy for the UK'.* This clearly seeks to encourage improved digital connectivity which it recognises is now essential. It sets out clear steps that the Government plans to take, including the NIC recommendations referred to above. These objectives have since been reconfirmed in Section 1 Building a Digital Society of the NIC's consultation document *'Congestion, Capacity, Carbon: Priorities for National Infrastructure'* published on 17 October 2017.

5.37 Local planning authorities can, therefore, expect to have placed upon them a positive duty towards the provision of digital infrastructure, which would entail granting the necessary consents for base stations such as that now proposed at the application site. The Government has also commenced engagement with operators, including Arqiva and the Mobile Network Operators, about further town planning reform to ensure the deployment of 5G technologies and the many benefits they are anticipated to deliver. These include, for example, connected autonomous vehicles, smarter roads, smart cities and homes, agri–tech and improved health services.

5.38 These trends serve to increase the level of need and public demand for high quality mobile digital connectivity. Consequently, existing infrastructure must either be upgraded or, in locations where there is no existing infrastructure, it must be installed for the first time and this only increases over time.

5.39 In the light of the above, we consider that the careful approach taken to the siting and design of the apparatus demonstrates that all reasonable steps have been taken to minimise visual impact having regard to the technical and operational constraints that apply in this case. The proposal, therefore, accords with the various strands of telecommunications, design, and heritage planning policy set out in the NPPF and the Development Plan.

6. DESIGN AND SITING CONSIDERATIONS

6.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended. However, to assist your consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations. Due regard has been given to the factors listed in Appendix A of the Code of Best Practice.

Amount, Design, Layout and Scale of the Development

6.2 The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide coverage to the local area, having regard to the need to minimise visual impact, already referred to and explained in detail in the **Supporting Operational and Technical Justification** statement. With regard to the main component elements of the development proposed, we highlight the following:

- **Kept in proportion to the building or structure**

  The scale and size of the apparatus is not large and when installed should look proportionate to the building a whole. The antennas are similar to the existing electronic communications apparatus installed on the building. They will, therefore, be seen in the context of this apparatus and will not appear as incongruous or jarring additions to the building or look out of place within this densely developed urban townscape.

- **Respect architectural style**

  Within the severe technical constraints, the apparatus will be installed in a manner that respects architectural style of the building and will appear as relatively minor additions at roof level.

- **Have minimal impact above the roofline commensurate with technical constraints**

  The apparatus that projects above the roofline has been kept to the minimum having regard to the technical parameters and design considerations explained above. The impact on the apparatus remains contained and views towards this apparatus from ground level will be limited.

- **Not be detrimental to views and general skyline**

  A combination of design, the backdrop provided by built development and perspective should help keep any perceived changes to views and the skyline to within acceptable limits. Indeed, within the context of this urban location the attention of the casual observer is likely to remain be focussed more upon the streetscape.

- **Avoid creating clutter**

  The apparatus should not look unduly cluttered and insofar as it might be visible it will be viewed as operational electronic communications equipment compatible and now expected on a building that already hosts a base station.

- **Antenna Array**

  The numbers of antennas and their size has been kept to the minimum necessary to provide coverage for the operators' networks. The design of these features is very much driven by operational and technical factors.

- **Equipment Cabinets**

  The number of cabinets and their size has been limited to what is required to provide power to the base station and meet the operators' current and foreseeable network requirements. The location and design of the equipment cabinets, and the electronic communications equipment housed within them, reflects their functionality and the technical and operational requirement to be

in reasonable proximity to the antenna systems they support. This avoids exceptionally large runs of feeder cables and associated supporting trays, and the subsequent loss of signals.

Access Considerations

6.3 Vehicular access to the site will be provided from the existing approaches to the hotel from High Holborn and Drury Lane. Thereafter, access to roof level will be provided from the established internal routes to the various roof levels. These existing routes do not require any amendment as part of the development proposed.

6.4 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing. In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff.

6.5 Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Landscaping

6.6 The proposed siting of the development has been very carefully chosen to minimise environmental impact. Any potential impact of the development is principally associated with the pole-mounted antennas, which are the most visible component of the base station, and which cannot be fully screened for operational reasons.

6.7 The proposed siting of the antennas at roof level at heights of between 32-38m above ground level means that a scheme of landscaping would be unrealistic in any event.

Appearance

6.8 The sensitive approach to siting and design should minimise the appearance of the development proposed. Insofar as the component parts of the base station may be visible they should look straight forward in appearance and reflect their function. To that extent they should in time become accepted features of the townscape, as with other forms of communications networks and essentially public utility infrastructure such as roads and railways.

7. SUMMARY AND CONCLUSIONS

7.1 In summary, the application is in respect of electronic communications base station necessary to improve a vital network that provides public services.

7.2 The services provided by the operators are in the public interest and are in very high demand. In the UK mobile services now exceed fixed landlines in terms of customer numbers and usage. The public interest of the proposed base station is clear from the considerable benefits that will flow, and it makes a significant and major contribution towards sustainable objectives.

7.3 The operators' requirement is in the context of network needs associated with a cellular system. These impose particular locational and siting requirements. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.

7.4 The operators have followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:

- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Arqiva.
- Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
- An examination of design options to try and minimise potential visual impact.

7.5 The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.

7.6 This statement and the other accompanying material have demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in the NPPF. It is a form of development that is specifically encouraged as a matter of principle – hence the planning permission granted by the GPDO - and in its detail complies with the policy objective of minimising potential environmental impact.

7.7 Consequently, we consider there are no grounds on which permission should be withheld for the implementation of permitted development rights to install the base station at the application site.