

## SUPPLEMENTARY INFORMATION

### 1. Site Details

Site Name:	Granary Square	Site Address:	Granary Building, 1 Granary Square,
National Grid	530180, 183678		Kings Road, London, N1C 4AA
Reference:			
Site Ref Number:	CAM(TBC)	Site Type:1	Macro

# 2. Pre-Application Check List

## **Site Selection (for New Sites only)**

(Would not generally apply to upgrades/alterations to existing sites)

Was 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:		
Not aware a register exists.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		
n/a		

# Site specific pre-application consultation with local planning authority

Was there pre-application contact:	<del>Yes</del>	No
Date of pre-application contact:	n/a	
Name of contact:	n/a	
Summary of outcome/Main issues raised:		

Correspondence was sent to Camden Council by email on the 14<sup>th</sup> of February 2019, however no response was received.

# **Community Consultation**

Rating of Site under Traffic Light Model if required:	Red	Amber	Green
Consultation letters were sent by email on 14 <sup>th</sup> of February 2019 to the St Pancras and Somers Town Ward Councillors – Councillors Khatoon, Robinson and Tomlinson			
Summary of outcome/main issues raised:			
No comments have been received.			

<sup>&</sup>lt;sup>1</sup> Macro or Micro



# School/College

Location of site in relation to school/college:

As search of the publicly available Department for Education and Ofsted records identified the nearest schools, colleges and nurseries as follows:

Central Saint Martins
Kings Cross Academy
Sfc at Kings Cross Academy
Kate Greenaway Nursery School and Children's Centre

Outline of consultation carried out with school/college:

Consultation was undertaken with all of the above on the 14<sup>th</sup> of February 2019.

Summary of outcome/main issues raised:

No comments have been received.

## Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for	Yes	No
Defence/Aerodrome Operator been notified?		
Details of response:		
N/a – This is a full planning application and not a prior approval.		

## **Developer's Notice**

Copy of Developer's Notice enclosed?		Yes	No
Date served:	N/a – the application see	eks planning con	sent and not
	prior approval. The relev	ant notice has b	een issued as
	per the information on ce	ertificate B.	

## 3. Proposed Development

## The proposed site:

The application site is the Granary the Granary Building, 1 Granary Square, Kings Road, London, N1C 4AA (NGR: 530180, 183678). The application relates to retention of small scale communications apparatus located both internally and externally. The site is host to a college of the University of the Arts London, formed of a combination of the traditional 19th century Grade II listed Granary building and a new section constructed in industrial materials and style.

The development includes the installation of 2No. freestanding antennas, 1No. 300mm dish, 1No. equipment cabinet on freestanding grillage, and development ancillary thereto. The antennas are



located internally, underneath the glass roof, with the dish and equipment cabinet placed on a section of the roof that is outside the glass roof (please refer to the attached plans). As the site is located on the site of a Grade II listed building, the proposed equipment has not been permanently fixed to any part of the building.



**Application Site from Above** 

Type of Structure (e.g. tower, mast, etc):	Pole mounted freestanding antennas
Description:	

Description:

2No. Freestanding Antennas (internal)

1No. 300mm Dish

1No. Equipment Cabinet fixed to freestanding grillage measuring 1.3m x 2m in total

Development ancillary thereto, including a GPS module, cable trays, and fixings (none of which are permanently fixed to any part of the building).

Overall Height:	N/A	
Height of existing building (where applicable):		N/A
Replacement Equipment Housings:		
Length:		As above
Width:		As above
Height:		As above
Materials:		
Tower/mast etc – type of material and external	N/A	
colour:		
Equipment housing – type of material and	Steel painted light grey.	
external colour:		



## Reasons for choice of design:

## **Background**

In designing the scheme the applicant sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints influenced the design and limited the scope to alter the appearance of the site to a significant degree.

When designing a radio base station, it is necessary to incorporate certain vital elements and to work around several technical constraints. There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signal(s), the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units) and communicate with mobile phones and wireless devises.

Other elements necessary for the base station to function are the power source (a meter cabinet or a generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas, link dishes and, depending on the nature of the site various supports, grillages and fixings, often referred to in general terms as "development ancillary to" the base station.

## Site design

Every effort has been made to minimise the visual impact of the proposed development. The equipment has been designed specifically for this location and incorporates a number of elements to minimise impact, including the following.

Keeping the amount of equipment to a minimum due to the location of the site within a Conservation Area and on a Grade II listed building. A total of 2No. antennas, 1No. dish and 1No. cabinet are included to provide 4G and, in due course, 5G coverage for UKB. These elements of the design ensure the impact of the development is kept to a minimum.

The placement of the equipment cabinet and dish on the outer part of the roof is in such a position that this equipment is not noticeable and doesn't impact on the everyday use of and movement around the site. The antennas, due to their size and position do not stand out or draw the eye when viewed in conjunction with numerous existing lighting equipment and industrial character of the internal space.

It is considered the proposed equipment is appropriately located. It has been possible to devise a scheme which has a minimal visual impact while still meeting the technical requirements of the site. The design results in a less intrusive facility than other possible designs and achieves maintenance of the character and appearance of the area. It is further considered the proposal strikes an appropriate balance between operational and environmental considerations. The smallest amount of equipment has been used that would still be capable of achieving the technical requirements of the site. Furthermore, none of the proposed equipment will be permanently fixed to the building, and thus will not impact on the fabric of the building itself.



#### **Technical Information**

All UKB sites are designed to be fully compliant with the precautionary guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP).

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, UK Broadband ("UKB") 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 UKB'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.

The planning drawings included with this application confirm the development would comply with ICNIRP guidelines.

### 4. Technical Justification

The UKB Group provides wireless services and solutions to the telecommunications industry, service providers, channel partners and the public sector within the U.K. UKB currently provides wireless services from across a number of sites using a combination of macro installations on tall buildings, ground based "street works" sites and small-scale wireless access points attached to street furniture such as lamp-posts and CCTV poles.

UKB's main service is providing 4G network coverage to London and other major cities in the UK. UKB are now also implementing installations and site upgrades to allow 5G coverage to be provided when the service is rolled out.



UKB's service is based on a network of radio base stations, which typically consist of a set of antennas and one or more small equipment cabinets. These are connected to the wider network either by transmission dishes (as in this case) or fibre-optic cables. In this case 2No. antennas, 1No. small equipment cabinet and 1No. transmission dish are required.

The network offers high capacity, secure, wireless, service guarantee levels needed to support initiatives including digital and social inclusion, mobile working, re-deployable CCTV security, emergency services data communications, community healthcare provision.

As stated in Paragraph 122 of the NPPF (2019) "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) ..." The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal, to enable UKB Broadband to provide high-quality network services to the surrounding area, will assist in achieving these objectives.

In its 2011 Communications Market report, Ofcom summarised one of the 'key market developments as follows: "The explosion in mobile data volumes. The increasing use of mobile broadband services via dongles and smartphones resulted in a 67% increase in data transferred over the UK's mobile networks in 2010..."

The increase in smart phone usage clearly demonstrated in the Ofcom Communications Market Report of August 2015, which makes the following key points in relation to mobile phones and 4G usage:

- 'Smartphones have overtaken laptops as the most popular device for getting online, Ofcom research has revealed, with record ownership and use transforming the way we communicate.
- Two thirds of people now own a smartphone, using it for nearly two hours every day to browse the internet, access social media, bank and shop online.
- A third (33%) of internet users see their smartphone as the most important device for going online, compared to 30% who are still sticking with their laptop.
- The rise in smartphone surfing marks a clear shift since 2014, when just 22% turned to their phone first, and 40% preferred their laptop.
- Smartphones have become the hub of our daily lives and are now in the pockets of two thirds (66%) of UK adults, up from 39% in 2012.
- The vast majority (90%) of 16-24-year olds own one; but 55-64-year olds are also joining the smartphone revolution, with ownership in this age group more than doubling since 2012, from 19% to 50%.
- The surge is being driven by the increasing take-up of 4G mobile broadband, providing faster online access. During 2014, 4G subscriptions have leapt from 2.7 million to 23.6 million by the end of 2014.
- We now spend almost twice as long online with our smartphones than on laptops and personal computers.
- On average, adult mobile users spent nearly two hours online each day using a smartphone in March 2015 (1 hour and 54 minutes), compared to just over an hour on laptops and PCs (1 hour and nine minutes).'



To meet this demand and improve the quality of service, additional base stations may be needed.

Furthermore, wireless telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

One of numerous benefits of this, on a wider scale, is that this allows for an increase in home working, by providing the opportunity to create a "virtual office", reducing the need to travel for work as a consequence, which is helpful in supporting the sustainable development agenda.

It is therefore very important for 'mobile only' households that live and work and any businesses that operate in this part of the LPA's area, together with visitors and others who are staying in or travelling through the area, that the necessary indoor RF coverage is provided to enable them to have satisfactory mobile telephone and internet access, and thereby help achieve the Government's objectives for inclusive development and the rollout of modern high-speed communications networks.

It is for these reasons that the National Planning Policy Framework places such emphasis on encouraging the continued rollout of high-speed digital infrastructure networks, of which this development will form a key part. This position was reinforced by a statement made by the former Prime Minister David Cameron in March 2016 when he specifically addressed the vital importance of mobile connectivity for residents and local economies and highlighted that the urgent delivery of the required network improvements is a Government priority;

"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".

#### Site Selection

There was a site specific requirement to provide wireless communications services at this location, thus the consideration of alternative siting options was not undertaken.



#### Additional relevant information:

### **Environmental Information:**

The application site is not located in an area considered to be environmentally sensitive, or within an identified protected habitat or protected species area. The proposal will subsequently not have any potential negative impacts on any sensitive habitats or species. Furthermore, a check of the Environment Agency website has confirmed the site is within a Flood Zone 1 area, being an area with a low probability of flooding.

As far as practicable the development has been designed to keep to a minimum the impact on amenity and on heritage assets in the area. The use of an existing communications site and the design of the development ensures there would be only a limited impact which would not be sufficient to harm visual or residential amenity, or heritage assets.

## **Heritage Statement:**

The application site is located within the Regent's Canal Conservation Area and on the Grade II Listed Building (The Granary Building).

The Regent's Canal, part of the Grand Union Canal, winds its way through the London Borough of Camden on its way to joining the river Thames, forming a corridor of unique character. The Canal is linked to a 3,000-mile network of waterways. The concentration of industrial archaeology along the Camden section of the canal, with its associated railway features is of exceptional interest and quality, unparalleled in London. It is an important feature of historic and visual interest in the wider townscape and, following the decline of traditional canal-related commercial activities, has been increasingly recognised as a valuable resource for water-based leisure activities, for its tranquil seclusion, for its ecological value and its potential for transportation and informal recreation. The ever-changing views, the variety and contrast of townscape elements and the informal relationship between buildings and canal make significant contributions to the character of the canal. Different sections of the canal vary considerably in terms of aspect, level, width and orientation and in the nature and function of adjacent buildings and landscape. Important features and key aspects of conservation are focused around preserving the view, setting and function of the canal, and to improve its potential for recreation, transportation and wildlife.

The site above the canal is dominated by Cubitt's Granary of 1851, built in the same functional form as Kings Cross passenger station, which is its contemporary. The building had a series of docks incorporated into its basement for the trans-shipment of goods between the canal and the railway. The limited access in and around the site and in particular the lack of a direct link towards the station contribute to the isolation of the site. Two 580-foot-long sheds flank the Granary though they are slightly earlier in date. The two office buildings built in front of the sheds are later additions. The East and West Transit Sheds, the original office block ('Regeneration House') and Midlands Goods Shed and the two Handvside Canopies are regarded as being within the curtilage of the listed Granary.

As noted previously, the Granary building has been subject to more recent redevelopment as part of the regeneration of King's Cross, with modern additions to the building itself to form the arts college space and formation of the new urban square, Granary Square.

The need and desire to conserve and where possible enhance the existing character of the Canal and the Granary Building is recognised by the applicant. Given the nature and scale of the development, it is considered that the proposal will achieve this goal of preservation and it will not detract or impact



on the special features listed as important to preserve with regards to this conservation area and building. The access to, and views to and from the canal, as well as the listed building, will not be significantly impacted. Furthermore, but avoiding any permanent fixings to the building, the proposal will preserve the fabric of the building and the works are considered to be in keeping with the recent regeneration and redevelopments here.

The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding substantial harm to the surrounding area. The equipment will only be visible from certain key vantage points; however, its impact would not be excessive. The small scale of the development, within and on the roof of a large building, does not have a significant impact on the building or conservation area.

On balance this small scale installation is considered to be optimum in terms of siting and design, not resulting in any substantial harm to the host building or on the surrounding area. Any limited impact is balanced by the provision of enhanced services to the area in the public interest. As such, equilibrium is achieved between technical requirements and environmental impact.

It should also be noted that paragraph 196 of NPPF 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".

It is important to keep the impact of communications infrastructure in the area to a minimum and it is considered that the proposal achieves this. The benefits of the proposal however also need to be considered. While the applicants do not suggest that the installation has no impact, that impact is minimal and when the balancing method advocated in the NPPF is applied the results are weighted in favour of the development.

## **Impact of Development**

The design of the base station is very simple, with two sets of single pole-mounted antennas located on freestanding frames, one dish fixed to an existing column and one equipment cabinet fixed to freestanding grillage located on the roof of the building. The cabinet and dish are located on a section of roof outside the glass section and are small in scale. Overall this is considered to be the optimum form of development within this setting.

It is acknowledged that views of the equipment are achievable from points within the building. From external viewpoints, there is negligible visibility or impact. It is important to note at this juncture that the fact that something might be visible does not mean that it is necessarily harmful. It is considered that the proposal, when viewed in the context of existing lighting equipment and within the context of the building, which has a deliberately industrial character, does not have any significant impact on the appearance of the building. It is submitted then that the appropriate siting and high standard of design will result in a proposal which is highly suitable to its setting. Consequently, there would be no significant or negative impact upon visual amenity, nor cause harm to the character or appearance of the conservation area or listed building.

On balance this location is the optimum o in terms of siting and design, with the limited harm it may impose being balanced by provision of enhanced network services to the area in the public interest, and the lack of suitable available alternatives. As such, equilibrium is achieved between technical requirements and environmental impact.



## **Planning Context**

# National Guidance National Planning Policy Framework (2019) (NPPF)

The NPPF sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states "The purpose of the planning system is to contribute to the achievement of sustainable development", and in paragraph 10 that "at the heart of the Framework is a presumption in favour of sustainable development". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

- "a) **an economic objective** to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

For **decision-taking** (paragraph 11) this means:

- "c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date7, granting permission unless:
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. 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."

Further to this, paragraph 38 states that "Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area."

The development will enable the provision of reliable wireless communications services to the surrounding area, bringing about substantial public benefit both socially as well as the allowing for certain businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the 'virtual office', thus reducing the need to travel and contributing to the sustainability agenda.



Government advice in recent years has been to promote and encourage communications services. Within his presentation to Parliament in July 2015 of the Government report "Fixing the Foundations: Creating a more prosperous nation" the Chancellor of the Exchequer reiterated the importance of a high-speed digital communication infrastructure. "7.1 Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

By reducing regulatory red tape and barriers to investment, the government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published in March, of near-universal 4G and ultrafast broadband coverage."

The NPPF (2018) directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

"b) infrastructure for transport, **telecommunications** (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"

Leading on from this, paragraph 112 states that "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections".

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 113 states that "The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged".

It is not possible to utilise an existing installation in this case to bring the required services to the target area. The above guidance recognises that new sites are sometimes required for the *efficient* operation of the network, as in this case.

Paragraph 116 states that "Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure". Compliance with those guidelines is confirmed by the ICNIRP certificate provided.

The proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.



### **Development Plan Policy**

Section 70 of the Town and Country Planning Act 1990 as amended 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, the current adopted development plan for Camden Council, relevant to the proposal, comprises:

- The London Plan: Spatial Development Plan for Greater London;
- The Camden Local Plan (2017).

These are discussed below:

### The London Plan

The London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In Paragraphs 1.38-1.41 'Ensuring the infrastructure to support growth', the 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 applicants' network is an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the 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, which states that:

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

At paragraph 4.55 of the supporting written justification to policy 4.11, the Mayor "wishes to ensure sufficient ICT connectivity to enable communication and data transfer within London, and between London, the rest of the UK and globally" and "...support ubiquitous networks – those supporting use of a range of devices to access ICT services beyond desk-based personal computers..." Furthermore, at paragraph 4.57, the Mayor states the intention to "...support competitive choice and access to communications technology, not just in strategic business locations but more broadly for firms and residents elsewhere in inner and outer London, and to address e-exclusion amongst disadvantaged groups."



Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing UKB to provide continued and enhanced coverage to the surrounding area.

## **Local Plan**

There are no policies relating directly to telecommunications development within the Camden Local Plan. General policies of relevance include D1 (Design) which requires a high standard of development, and policy D2 (Heritage). This policy aims to preserve and enhance Camden's heritage assets, including conservation areas and listed buildings. Development within conservation areas is required to preserve or enhance the character or appearance of the area.

It is considered the development complies with both policies. The scheme has been specifically designed for this location, with the majority of apparatus visible only from within the modern, industrial style interior. The external elements are small in scale and have been positioned so as to prevent any unacceptable impact upon the appearance of the building or within the wider area.

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 and would preserve heritage assets.

## **Summary**

The apparatus has been sited and designed to minimise the impact on the host building, the surrounding environment and its conservation area setting. It represents the most suitable option available to the applicant, taking into account the planning and technical considerations, to being the desired wireless communications services to this specific location and has resulted in a negligible impact to the site and wider area.