

DESIGN AND ACCESS AND HERITAGE STATEMENT

**Hygiene & Tropical Medicine
1 Keppel Street London
WC1E 7HT**

This Design and Access and Heritage Statement is provided in conjunction with the Supplementary Information Template, drawings and supporting material that was submitted with this planning application [and application for listed building consent]¹.

This statement is submitted pursuant to Article 4C of the Town and Country Planning (General Development Procedure) Order 1995 (as amended) [and Regulation of 3A of the Planning (Listed Buildings and Conservation Areas) Regulations 1990 (as amended)]².

In accordance with the Code of Best Practice on Mobile Phone Network Development³, and published Government guidance, this proposal was drawn up having regard to the need for good design.

In particular:

- Considerations of design and layout are informed by the context, having regard not just to any immediate neighbouring buildings but the townscape and landscape of the wider locality. The local pattern of streets and spaces, building traditions, materials and ecology all help to determine the character and identity of the development.
- The scale, massing and height of proposed development have been considered in relation to that of adjoining buildings; the topography, the general pattern of heights in the area; and views, vistas and landmarks.

The following general design principles have been taken into account in respect of this proposed telecommunications development:

- A proper assessment of the character of the area concerned.
- That the design shows an appreciation of context;

SITE CONDITIONS, TECHNICAL CONSTRAINTS, LANDSCAPE FEATURES AND CAPACITY REQUIREMENTS

Introduction

It needs to be borne in mind that the proposed development is for a mobile telecommunications installation. Hence, access is deliberately restricted, where appropriate, for the security of the installation.

¹ Delete as appropriate.

² Delete as appropriate.

³ Paragraphs 120-126.

Pre Application Discussions and Negotiations

Prior to the submission of this application the applicant initiate pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues. Further consultation has also been carried out with the Ward Councillors.

Design Component

The proposed site at Hygiene & Tropical Medicine, 1 Keppel Street London, WC1E 7HT is an established telecommunication installation. This submission is purely to upgrade this existing installation with new equipment to facilitate 5G coverage.

The current roof equipment is being upgraded with minimal visual impact, indeed the visual implications of this upgrade are negligible. The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. H3G and EE have a network sharing agreement and thus these installations are fully compliant with the NPPF.

The applicant appreciates that the site is Listed however, the alternative to upgrading this site is a new standalone large 5G installation in the immediate area. Upgrading the proposed site is from a sequential site selection process the optimum planning solution. A new mast in the area would be contrary to policy.

Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 124) of the National Planning Policy Framework. It states:

"Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."

In keeping with the National Planning Policy Framework (NPPF). guidelines of using: "high quality communications" (Section 10), the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing built environment. The design of the proposed equipment is considered to be the least visually intrusive option available.

In keeping with the National Planning Policy Framework (NPPF). guidelines of using: "high quality communications", the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing built environment.

The presence of the roof top equipment sets a clear precedent for telecommunications development in this location and indicates that the principle of this proposal is acceptable in terms of siting. As stated above the National Planning Policy Framework advocates site sharing, and as such we believe that there are no sequentially preferable locations within the defined site search area.

The design of the proposed equipment is considered to be the least visually intrusive option available. Although it is accepted that there will be very marginally intensification in the amount of equipment it is felt that such a minor increase would not detract from the character of the area in which the proposal sits.

Any other proposal to satisfy the identified requirement would result in the addition of a separate ground based column elsewhere in close proximity to the existing structure. In our opinion, such a proposal

would, in this instance, unnecessarily add to the clutter in the streetscene and result in a greater visual impact.

Site Ref 27469 Site Address: The School of Hygiene and Tropical Medicine, 1 Keppel Street, Bloomsbury, London, WC1E 7HT

Local Planning Authority: London Borough of Camden

Development Plan: Camden Local Plan (2017)

Fig.1 – CA Map Extract (reference only)



Site and its surrounds

Policy Relevant to the Development Site:

The site is designated as being in the settlement boundary, with urban uses to the north, east, south and west. The site is in the Bloomsbury Conservation Area. The site is also a Grade II Listed Building. The land designation that this site is located in is a material consideration.

The London Borough of Camden does not have a specific telecoms policy. Therefore the NPPF is of relevance. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with the NPPF.

Policy Analysis:

Policy D2 states:

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building;
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
- k. resist development that would cause harm to the significance of a listed building through an effect on its setting.

The proposed works on this site would be suitably distant and diminutive in scale and design (when seen in context) as to not be to the detriment of the surrounding area or its character (the visual change would be limited) as well as respecting the integrity of the building, and yet would provide the requisite coverage needed in the area as well as facilitate site sharing, so according with the principles of the policy, so ensuring any less than substantial harm is outweighed by demonstrable public benefit.

It accords with the requirements of the NPPF and the objectives of the London Plan (Policy 4.11 Encouraging a Connected Economy (March 2015))

Technical Information

ICNIRP Declaration attached

ICNIRP 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 the site are taken into account. Yes

Frequency: This information can be emailed to the LPA on request
Modulation characteristics As above
Power output (expressed in EIRP in dBW per carrier)

In order to minimise interference within its own network and with other radio networks, (EE 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 (EE Ltd)'s network, the radio base station that is the subject of this application will be configured to operate in this way. As above

Height of antenna (m above ground level) 34.5m AGL - See drawings

Technical Justification

The National Planning Policy Framework clearly states that authorities should not question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.

The site is required to provide enhanced coverage for EE Ltd, ESN and H3G LTE.

Discounted Options

In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF) following search criteria have been utilised. Firstly consideration is always given to sharing any existing telecommunication structures in the area, secondly consideration is then given to utilising any suitable existing structures or buildings and thirdly sites for freestanding ground based installations are investigated.

This sequential approach is outlined below:

- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPPF all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Ofcom Site Finder mast register is always examined prior to the submission of an application. This is an upgrade to existing sites thus no other standalone new facilities have been investigated. A new additional mast to facilitate the upgrade would not be in line with NPPF by upgrading the current facility the most sequentially preferable option has been progressed.

Background to the Proposal

Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using their mobiles in their homes and this means we need to position base stations in, or close to, residential areas.

A further limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However, if this overlap is too great unacceptable interference is created between the two cells.

DEVELOPMENT PLAN POLICY.

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, it is stated that:

"Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise."

NATIONAL PLANNING POLICY

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF July 2018) sets out the Government's planning policies for England and how these are expected to be applied at the Local level. It provides a framework within which local people and their accountable Councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including;

- Economic Role – contributing to building strong, responsive and competitive economy;
- Social Role – Supporting strong vibrant and healthy communities; and
- Environmental Role – Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. The NPPF recognises the vital importance of high quality telecommunications and dedicates a whole chapter to this. Chapter 10 of the NPPF outlines the Governments support for high quality communications. The paragraphs below clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 112 states:

"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. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution)."

It continues in Paragraph 113

"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. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate." Operators always follow the sequential site selection process. Where an existing site can be shared or upgraded this will always adhered to before a new proposal is put forward for consideration.

The support for telecoms and the need not to constrain Operators is laid out in Paragraph 116

"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."

Access

Access to the development is by definition limited to the operator and its authorised agents.

Listed Building Consent Statement⁴

This Design and Access Statement is submitted to support an application for listed building consent. In submitting this application specific regard has been had to the statutory tests contained in the Planning (Listed Building and Conservation Areas) Act 1990, published Government guidance and the Code of Best Practice on Mobile Phone Network Development.

In submitting this application, special attention has been paid to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.

Particular regard has been had to the historic and special architectural importance of the building and particular physical features of the building that justify its designation as a listed building and the buildings setting.

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Conclusion

We consider that the development is compliant with the council's policy and that in accordance with Section 38 (6) of the Planning and Compensation Act 2004 permission should be granted for the installation.

We consider the development complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community while minimising visual impact.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

On the basis of a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the requirements of the National Planning Policy Framework and Local Plan Policies.