

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Central St Giles	Site Address:	Central St Giles 1 St Giles London London WC2H 8AG
NGR:	E:529969 N:181329		
Site Ref Number:	CTIL_242201_TEF_N/A_VF_15320	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 an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	
If no explain why: N/A		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	06.11.2019	
Was there pre-application contact:	Yes 2019/5697/PRE	
Date of pre-application contact:	Various	
Name of contact:	Matthew Dempsey	

¹ Macro or Micro

Summary of outcome/Main issues raised:

Cornerstone and Vodafone's agents wrote to Camden Council on 06 November 2019. The paid pre-app letter advised the LPA that:

'Cornerstone, Telefonica and Vodafone are in the process of progressing a suitable site in the New Oxford Street area of London for a replacement radio base station. We aim to work with you to progress a proposal that is both acceptable to your authority and meets Vodafone's technical network requirements. This approach accords with Vodafone's Best Practice Commitments to ensure consultation with Local Planning Authorities and other appropriate key stakeholders.

As part of Telefonica and Vodafone's continued network improvement program, there is a specific requirement for a replacement rooftop installation at 1 Central St Giles to replace the nearby radio base station which was lost at Castlewood House. The site provider at Castlewood House served the operator with a notice to quit to enable his plans to redevelop the site to come to fruition. The original site has been decommissioned and is now off air. There is currently no coverage for Vodafone in this busy location within the capital. There is therefore an urgent need to provide replacement coverage as soon as possible, as the operator's customers are unable to utilize their handheld devices in this cell area contrary to the operator's legal requirements to provide a service and the customers reasons for purchasing their handheld devices. A replacement installation in this location will ensure that the latest high quality 2G, 3G and 4G service provision is maintained and enhanced in and around New Oxford Street.

Notably, this is one of three sites required by Cornerstone and Vodafone to provide replacement coverage for the existing site at Castlewood House. Please refer to the Image 1 below:

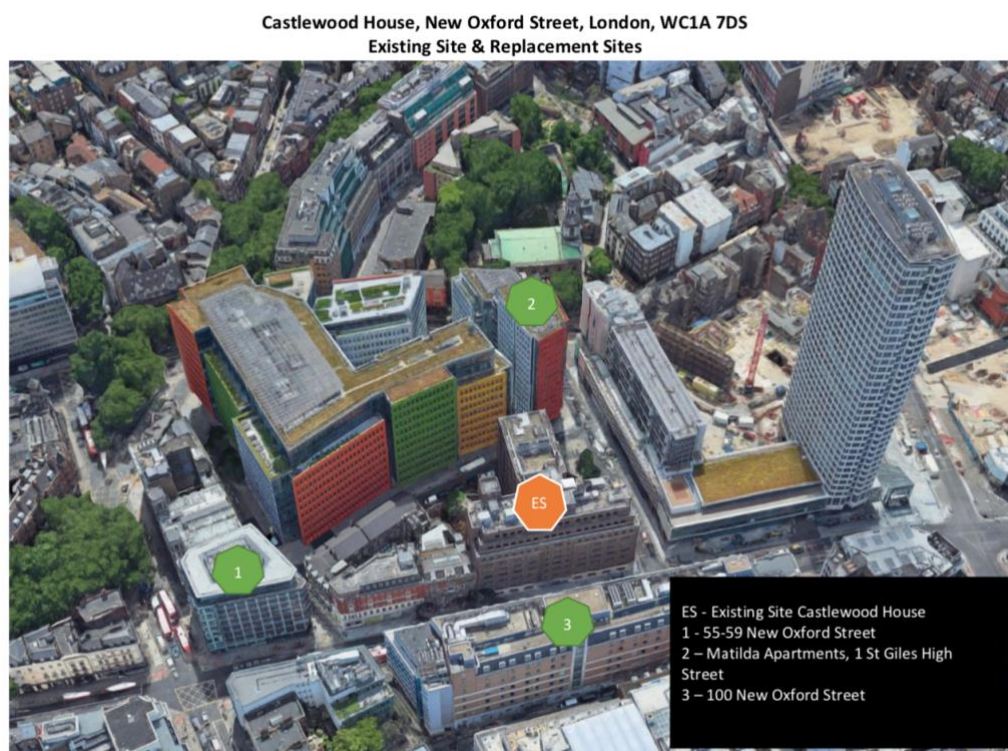


Image 1: Castlewood House and replacement sites

The LPA provided formal pre-app comments in an email dated 05 February 2020.

General comments:

'Site visits both at roof top level and from street level/ public realm viewpoints have revealed that there would be several places around each site where the structures would be plainly visible from ground level. We should also consider the outlook from other buildings, and this is also considered to present an issue with regards visual impact.

To overcome the negative visual impacts of the proposed installations, we would suggest that any proposed equipment should be added to the existing features/ fabric of the buildings, e.g.) the existing central roof top structures, as this would minimise any impact of roof top 'clutter' by shielding/ masking new features (such as proposed antennas). In these circumstances; it is generally considered preferable to add to an existing structure rather than create a new one, or to significantly alter the roof form.

Also; rather than installing scaffolding style rig structures to house the apparatus, greater care should be taken to assess the host building to provide a bespoke solution to the visual impact. There is particular concern about altering the roof-form when appreciated from longer views. For example; 3 or 4 or 5 new scaffold rigs are considered to significantly alter the roof form.

Officers have suggested that apparatus should be painted/ coloured to match the existing roof top in each case, to help blend the equipment with the roof and minimise visual impact. It may be beneficial to include tidying up of roof tops (sites in general) as part of any proposal to ensure the visual impact of any installations is not considered to be negative. It should be noted that where proposals have been welcome historically these included commitments to remove any unwanted equipment as part of the works.

Conservation and Heritage Officers also have particular concerns about the 'scaffolding' structures proposed to support antennas. In short, these are considered ugly. It is understood that it is far cheaper for the applicant(s) to propose more or less the same scaffolding rig structure at each site, however each site is different; and in order to minimise the visual impact of installations, each site should be treated as an individual design challenge rather than using a one size fits all approach. In this regard, it would be preferable to see antennas fixed directly to the host building (visual impact minimal), rather than constructing a 'rickety' tower to plonk them on (visual impact significant)'.

Central St Giles Feedback:

'This block is 16 storeys in height and similarly to other tall buildings visual impact from the immediate street level will be quite minimal however; this increases the potential for visual impacts in longer views. Additionally due to the proximity of many other tall buildings in the vicinity, view of the site roof top are appreciable from several locations nearby. Furthermore; the surrounding street context of the site is such that there are positions from nearby street level where any installation as proposed will be visible.

It is welcomed to see the proposed antennas attached to exiting 'grillage' as opposed to upon bulky scaffold rigs, however rather than positioning antennas vertically it would be preferable to see these positioned horizontally to minimised the overall impacts.

We have only been provided with a proposed West elevation, should you apply for any installation we would encourage the provision of proposed elevations on all sides to ensure all aspects and implications are available during the consultation stages of an application.

We would also advise taking photographs from the public realm showing all views surrounding the site to accompany any application, and ideally these would be overlaid with the proposed installations to give an indication of how the installation would look should it receive approval and be installed.

Although the site is not within a conservation area, it is surrounded by the Bloomsbury Conservation Area, the Seven Dial Convent Garden Conservation Area and the Denmark Street Conservation Area, and given the height of the proposed site/ development, it is considered that this could have impact on the character of the conservation areas. Additionally, there are very many listed buildings in close proximity to the site.

It would also benefit any such proposal if public improvements could be identified and proposed alongside telecoms installations, for example; the provision of wireless internet connections for occupants of the block would be welcomed. Additionally the tidying up of the roof top site would be beneficial to proposals, although it may be noted that roof access was not provided as part of this pre-app'.

Jenny Bye Cornerstone's London Planning and Relationship Strategy Manager and the Head of Design from Clarke Telecom met with Matthew Dempsey of Camden Council on the 19th February 2020.

In response to LPA written and verbal feedback the applicant has provided a full set of elevations, a design rationale, photomontages as part of this submittal pack.

Due to the window cleaning gantry the design has evolved since this meeting. The height of the equipment has been raised by 2.1m. Design engineers further investigated moving the antennas further back from the edge of the building. A stub mast design (6m high) was also explored but rejected for technical reasons.

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline Consultation carried out:			
Prior to the submission of this application the applicant-initiated pre-consultation discussions with the local planning authority and stakeholders. This provides an opportunity for the LPA and stakeholders to discuss the development proposals and identify specific issues early.			
Consultation with Holborn and Covent Garden Ward Councillors (J Fulbrook, A Olad and Sue Vincent) and Keir Starmer MP. Pre-application consultation letters and drawings of the proposals were sent on the 07.02.2020.			
Summary of outcome/main issues raised (include copies of relevant correspondence):			
No response at time of making the application.			

School/College

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

None nearby in term of the Code of Best Practice.
Outline of consultation carried out with school/college (include copies of main correspondence): N/A
Summary of outcome/main issues raised (include copies of main correspondence): N/A

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?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	02.04.2020 (Covering Letter, notice and proof of delivery form part of this submittal pack)	

3. Proposed Development

The proposed site:
<p>The site</p> <p>This application relates to a new telecommunications installation at the site shown on the photograph below:</p>



Image 2: The Application Site

The operators have specified the installation of a telecommunications base station consisting of the installation of 10 no. antennas (top height of masts 52.10m AGL), 2 no. transmission dishes, equipment cabinets and ancillary development thereto.

1 Central St Giles is an unlisted building within the setting of Bloomsbury Conservation Area, the Seven Dial Convent Garden Conservation Area and the Denmark Street Conservation Area.

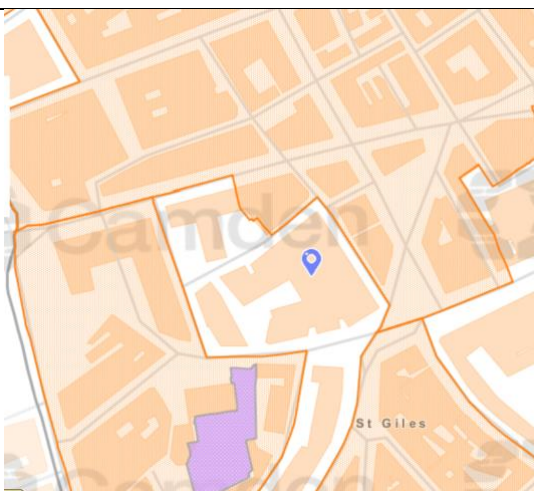


Image 3: Extent of adjacent Conservation Areas



Image 4: Application site in relation to listed buildings

Central Saint Giles is one of London's more colourful mixed-use developments and at 16 storeys is one of the largest in the West End. The site links four of Central London's well known destinations; Bloomsbury, Covent Garden, Soho and Fitzrovia, Central Saint Giles.

To the north west is the NTQ site Castlewood House. Bloomsbury Conservation Area lies to north, to the west lies Denmark Street Conservation Area and the Grade II Listed (East side) Nos.101 AND 103 Centre Point and Pond to front. Seven Dials (Covent Garden) Conservation Area lies to the east and to the south lies the Grade I Listed Church of St Giles-in-the-Fields.

Enclose map showing the cell centre and adjoining cells if appropriate:

The site provider at Castlewood House served the operator with a notice to quit to enable his plans to redevelop the site to come to fruition. The original site has been decommissioned and is now off air. There is currently no coverage for Vodafone and Telefonica in this busy location within the capital. There is therefore an urgent need to provide replacement coverage as soon as possible, as the operator's customers are unable to utilize their handheld devices in this cell area contrary to the operator's legal requirements to provide a service and the customers reasons for purchasing their handheld devices. A replacement installation in this location will ensure that the latest high quality 2G, 3G, 4G as well as new 5G service provision is maintained and enhanced in and around New Oxford Street and Central St Giles.

The operator is seeking to replace the existing installation on Castlewood House to enable enhanced 2G, 3G and 4G coverage and capacity to the surrounding area as well as new 5G services for both Vodafone and Telefónica to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

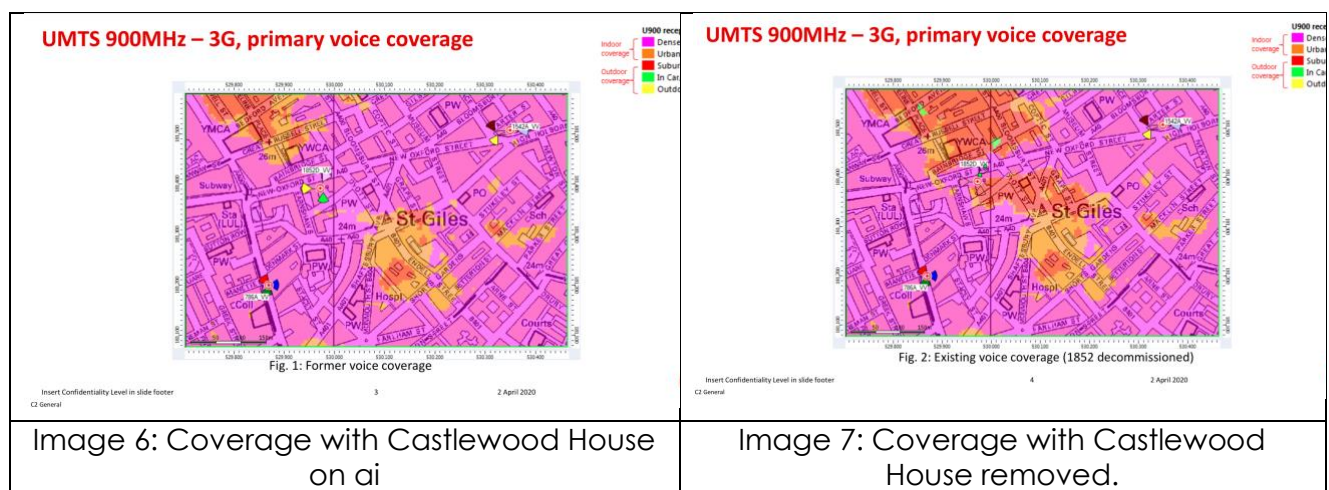
The 3G and 4G provision allows internet access, video calling, data downstreaming, accessing social media networks and emailing to name just a few of the benefits. Therefore, to maintain high quality indoor 3G and 4G services in to this area would promote activity in line with the general population demand as the ownership of smart devices increases. 5G will deliver unparalleled speeds and capacity, with significantly reduced latency, which will be needed to deliver numerous innovative applications from autonomous cars to Internet of Things.



Image 5: Castlewood House

A replacement site in this location will ensure that the security of the latest technologies will be provided into the network particularly for the data hungry applications of the latest smart hand-held devices. The operators have followed a sequential approach to site finding and identified this site as part of this process. As an existing building, adjacent to the existing site, it will provide the necessary replacement coverage/capacity and improved services within this very busy commercial area of Central London.

3G and 4G signals by their very nature (as they carry high data rates) do not penetrate over long distances, (5G even less so), just a few hundred metres, depending on the topography of the land, building clutter and vegetation including trees in the area which can reduce their effectiveness.



Without this new site the numerous business, visitors, residents and students who depend on the service will notice their service sharply diminish resulting in dropped calls, the inability to make calls and non-existent or slow internet access. Clearly this would result in significant detrimental, social and economic impacts for the community should a replacement not be found and this is contrary to NPPF.

Fact sheets on Radio Planning and Propagation, 5G services and General Background Information have been attached to this application for reference.

Type of Structure: Pole Mounted	
Description:	
The proposals relate to the installation of 10 no. antennas (top height of masts 52.10m AGL), 2 no. transmission dishes, equipment cabinets and ancillary development thereto.	
Overall Height:	52.10 AGL
Height of existing building:	44.40 AGL (Main Room Level) 46.50 AGL (Upper Roof Level)
Equipment Housing: 2 x ICD Flexi Rack	
Length:	600mm
Width:	750mm
Height:	1500mm
Equipment Housing: 1 x Eltek 4 th Gen PSU	
Length:	700mm
Width:	730mm
Height:	1800mm
Equipment Housing: 2 x Tyrone CSC	
Length:	800mm
Width:	660mm
Height:	1770mm
Materials:	
Tower/mast etc – type of material and external colour:	Galvanised
Equipment housing – external colour:	Grey

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

The government through licence obligations regulated by Ofcom, are making the operators provide 4G service to the area and it is important that any design solution meets technical requirements in the most environmentally sensitive way. One of the main thrusts of 'Supporting High Quality Infrastructure' in the NPPF is a reduction in the proliferation of telecommunications sites. The guidance states operators **"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."** We confirm that the applicant has adopted a sequential approach to site selection as detailed in Section 5.

Matthew Dempsey of Camden Council advised during formal pre-app discussions (2019/5697/PRE):

'This block is 16 storeys in height and similarly to other tall buildings visual impact from the immediate street level will be quite minimal however; this increases the potential for visual impacts in longer views. Additionally due to the proximity of many other tall buildings in the vicinity, view of the site roof top are appreciable from several locations nearby. Furthermore; the surrounding street context of the site is such that there are positions from nearby street level where any installation as proposed will be visible.

It is welcomed to see the proposed antennas attached to exiting 'grillage' as opposed to upon bulky scaffold rigs, however rather than positioning antennas vertically it would be preferable to see these positioned horizontally to minimised the overall impacts'

We are not able to locate the equipment horizontally for technical reasons. Further justification can be provided if required.

Design Philosophy

Vodafone and Telefonica have specified the proposed installation of a telecommunications base station consisting of 10 no. antennas (top height of masts 52.10m AGL), 2 no. transmission dishes, equipment cabinets and ancillary development thereto.

The equipment will be shared by both Vodafone and Telefonica and as such this would ultimately reduce the need to introduce a new installation in to this cell area. This will avoid the need for added proliferation of new masts within the surrounding area whilst allowing the expansion and improvement of the electronic communications networks, including telecommunications and high-speed broadband.

The replacement site is required to fundamentally allow the operators Vodafone and Telefonica to provide high quality 2G and 3G services to the surrounding area, whilst also improving the latest 4G coverage and capacity and providing new 5G services.

The equipment has been designed so that it resembles as closely as possible other items of rooftop infrastructure which are commonly found within an urban streetscene.

The antennas are located in 5 sets of pairs on the north-west, north-east, west and south-west and south-east on the upper roof level. These antennas will have a top height of 52.10m and an underside height of 49.90m. The upper roof level is set well back from the main roof ridge. Therefore, the antennas will be further shielded from external vantage points at ground level. The area is already established with rooftop antennas as Castlewood House nearby had the operator's equipment on it, up until recently. The proposed antennas will appear very similar to these. It is considered that given the scale of this building that the antenna will not be prominent in the street scene.

The height and position of the antennas on the building are so that they can be justified from a technical perspective as the antennas need to clear the immediate roof so as not to create signal clipping and reflection. The height of a proposed antenna has to be offset against its positions on the roof, whereby the closer to the centre of the roof of the building the more height that is needed to clear the immediate roof space in front of the antenna. Furthermore, the additional height is required in order to avoid ICNIRP issues, which would sterilise a large part of the rooftop at lower levels. The pole mounted antennas enable the operators to provide the multiple technologies and meet their full coverage requirements to the target area within the permitted ICNIRP guidelines.

Furthermore, if the antennas were to be any lower, they would be blocked from obtaining a clear line of sight and therefore would not be able to operate effectively reducing the ability of the antennas to provide 3G, 4G and 5G coverage to the immediate area. Image 8 below demonstrates that from Central St Giles the equipment will not be prominent in views from the public realm.





Proposed West Elevation

Image 8: Photomontage of Proposed West Elevation

It is also highlighted that the operators' antennas were located at similar heights on Castlewood which is located within the setting of Bloomsbury Conservation Area and the Grade II Listed 5 – 24 St Giles High Street. As such, this would provide equivalent coverage to that which was provided by the former Castlewood House site and will be of a similar scheme design.

The equipment cabinets are to be located centrally on the upper roof level area and will comprise 5 no cabinets. As illustrated in the attached photomontages these cabinets will not be visible from ground level.

The shared proposal will negate the need for more potentially operator independent sites to meet licence obligations and replace the existing site due to be removed from the network. The height is a direct requirement due to the fact that the taller a site the further it can send signal and this negates the need for additional sites to pick up the shortfall.

A number of alternative designs have been considered as set out below:

Reduce antenna numbers

Due to the technical requirement for the operators, the number of antennas cannot be reduced. 10 no antennas are needed here to provide replacement 2G, 3G and 4G coverage for both Vodafone and Telefonica as well as new 5G services, thus a reduction in antenna numbers is not possible.

Pole Mounts on lower roof level.	Equipment located on the lower levels of 1 St Giles Street will be more prominent in the street scene than the current proposal.
Face mounted antenna on upper roof level.	Face mounting antennas on the upper roof level was investigated. However, antennas could not be face mounted on the upper roof level as this would not be ICNIRP compliant. People would not be able to walk in front of the antenna, and the edges of the building would clip the signal. The height and position of the antennas is the preferred design (see above) and the minimum height needed to ensure both coverage and ICNIRP compliance.
Face mounted antenna on Albion House elevations	Face mounting antennas on 1 St Giles was investigated. However, antennas could not be face mounted on 1 St Giles due to the location of the windows and adjacent buildings. The height and position of the antennas in the current proposal is the minimum height needed to ensure both coverage and ICNIRP compliance.
Stub mast on upper roof level	Our designer engineers have advised that for a stub mast on the plant room to enable coverage and ensure ICNIRP compliance, we would require 6m to the underside of the antenna from the raised grillage level. This would mean either a very headframe (at least 4m wide) to accommodate the 10 antenna on 5 different bearings with a top height of 8m or a dual stack headframe with a top height of 11m. Please note this is provided for information only; no investigation into the structural soundness of the plant room to accommodate a stub mast has been undertaken.

The technical requirements of mobile communication operators such as the applicant are acknowledged in the National Planning Policy Framework which states that local planning authorities should support the expansion of electronic communications networks, including telecommunications and high-speed broadband.

Placing masts near similar structures and utilising simple and unfussy designs is acknowledged in the 'Code of Best Practice on Mobile Network Development in England' to be less likely to dominate and be in discord with the landscape and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area. This design is considered to be an appropriate solution and shows the applicants efforts to help mitigate the proposals impact on the visual amenity, whilst also ensuring that proliferation of masts is reduced by the utilisation of existing structures by two operators as outlined within NPPF. One of the fundamental aspects of the NPPF is a reduction in the proliferation of sites.

As noted above NPPF advises "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."

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design of the equipment represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site. Taking all matters into account it is considered that this proposal to deliver the capability for a new and replacement services for two competing operators from a single network installation, would not appear out of place within the street scene.

Technical Information

<p>International Commission on Non-Ionizing Radiation Protection Declaration attached</p> <p>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.</p> <p>When determining compliance, the emissions from all mobile phone network operators on or near the site are taken into account.</p>	Yes	
<p>In order to minimise interference within its own network and with other radio networks, Vodafone Ltd and Telefonica 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.</p> <p>As part of Vodafone Ltd and Telefonica UK Ltd networks, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>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.</p> <p>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.</p>		

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:

A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

As already explained previously, a Notice to Quit on the former Castlewood House site, has instigated the need for a replacement installation for the operators Vodafone Limited and Telefonica UK Ltd.

The National Planning Policy Framework states that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt as set out below the replacement site is needed for the companies, via Cornerstone to maintain and improve their 2G/3G/4G services. Without the replacement equipment the existing 2G/3G/4G services will be lost resulting in dropped out calls, inability to access data and send texts and clearly this has significant detrimental, social and economic impacts for the community should a replacement not be found, which is contrary to NPPF. Moreover, 5G would not be rolled out in the area.

Moreover, the Covid-19 pandemic has created unparalleled demand and pressure on our networks while people try to keep life and the economy moving through isolation and containment measures, with many people now working from home or remotely.

Considering the significant importance placed upon our network rollout for socio-economic reasons, and how the network functionality is even more important during this challenging period to facilitate social communication, remote access to work and access to healthcare/emergency services it is the operators intention to continue with the rollout programme as efficiently as is reasonably possible

The area within which an installation needs to be established in order to meet the coverage requirement is constrained by the location and extent of the coverage provided by existing installations in the surrounding area. The proposed scheme relocates an existing established radio base station installation. This permanent resited and upgraded installation will provide additional coverage and capacity for Vodafone without the requirement for any further installations to be proposed within this locality. This will enable the operators to meet their efficiency, capacity and ever increasing technical capability requirements within a single grid network.

Coverage maps are a useful tool for establishing network coverage in an area. They are developed using assumptions regarding the handset use, expected level of call reliability and signal loss within a vehicle or a building. However, plots only tell part of the story as even when the coverage plots provided show good coverage in an area there may still be a requirement to improve capacity and as such local network services. Coverage plots show coverage issues only; they cannot show capacity issues.

Coverage plots are attached to this application for information. They clearly demonstrate a need for this proposal when the existing site is removed from the network.

In short, this proposal for a shared installation will negate the need for more potentially operator independent sites to meet licence obligations and to replace the Castlewood House site.

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. In addition, fact sheets on Radio Planning and Propagation and 5G services have been attached to this application for reference. This information is provided to assist the local authority in understanding any technical constraints on the location of the proposed development.

5. 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)

In accordance with the licence obligations and advice in the National Planning Policy Framework and the Code of Best Practice in England the applicant's network rollout team investigated the following siting and design options using this sequential approach to site selection:

- Upgrading their own existing base stations;
- Using existing telecommunications structures belonging to another communications operator. i.e. Mast and/ or site sharing, co-location;
- Installations on existing high buildings or structures including National Grid pylons;
- Using small scale equipment; and finally
- Erecting a new ground-based mast site – (1st) Camouflaging or disguising equipment. (2nd) A conventional installation e.g. a lattice mast and compound.

Alternative site options considered and rejected are as follows:

Site	Site Name, Address, NGR, Site Type	Reason for not Choosing
RT	Castlewood House, 77-91 New Oxford Street, London, WC1A 1DG NGR E: 529984 N: 181402	This is the NTQ site where the operator was originally located. An NTQ was served, the site has been decommissioned and is currently off air. This site is no longer available hence the need for a replacement site.
RT	St Giles in the Fields Church, High Street, London, WC2AH 8LG NGR E: 529961 N: 181267	This building is too low to provide the necessary coverage to the target coverage area. The surrounding tall buildings would prevent the antennas from being effective and an additional installation would still be required. There is also insufficient space in the church spire to accommodate a radio base station.

RT	Centre Point, New Oxford Street, London, WC1A 1DD NGR E: 529873 N: 181371	This site is being redeveloped and it is also listed. Therefore, the site is unavailable to the operators. Due to its listed status the preferred option would also have less impact as it is not a designated heritage asset.
RT	Fairgate House, New Oxford Street, London, WC1A 1HB NGR E: 529983 N: 181435	The building is lower than the surrounding properties. Therefore, the antenna signal would be blocked. This site is therefore not suitable.
RT	Burtons, 118/132 New Oxford Street, London, WC1A 1HL NGR E: 529850 N: 181399	This property is listed and therefore would have a greater impact on the character and appearance of a heritage asset than the preferred option which is not statutorily protected. The site also borders the next cell. A radio base station in this location would interfere with the existing radio base stations operation causing it not to work as effectively. This would be detrimental to the operation of the network in this area. As the site is on the edge of the search area it would not provide as good a coverage as the preferred option. This site has therefore been discounted for these reasons.
RT	55 New Oxford Street, London, WC1A 1BS NGR E: 530057 N: 181418	A site in this location would provide significant uplift in coverage due to the operators existing network configuration. As such, it would not provide the necessary coverage to the target coverage area for Telefonica and Vodafone. It has therefore been discounted for this reason.
RT	64-76 New Oxford Street, London, WC1A 1BS NGR E: 530025 N: 181455	A site in this location would provide significant uplift in coverage due to the operators existing network configuration. As such, it would not provide the necessary coverage to the target coverage area for Telefonica and Vodafone. It has therefore been discounted for this reason.

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

N/A

Environmental Information (refer to Section 2 of Site Finder Report):

See below.

Land use planning designations (if Heritage Statement is required then include here or make reference to attached Heritage Statement).

Relevant Planning Policy is detailed below.

Additional relevant information (planning policy and material considerations):

As already explained earlier, a Notice to Quit on the former Castlewood House site, situated to the north, has instigated the need for a replacement installation for the operators Vodafone Limited and Telefonica UK Ltd.

From the outset, it should be appreciated that irrespective of the proposed installation's use as a telecommunications base station, any change in form in the streetscene will always be, to some degree, a noticeable alteration to those residents and regular passers-by found closest. However, it should be recognised that visibility or a development's siting and appearance, does not automatically result in an overwhelming adverse harm.

The provisions of the GPDO require the local planning authority to assess the proposed development solely on its **siting and appearance**.

The principle of development has been established by the Government when the new permitted development rights came in to force in November 2016, which enabled sites such as this one to be built under the operators permitted development rights, (as the column height does not exceed 25m), with prior approval for siting and appearance being the only matters that the local planning authority can take in to consideration.

Planning Practice Guidance explains how a prior approval application differs from a planning application at paragraph 28. It states that:

'The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established (emphasis added). Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion on what processes they put in place. It is important that a local planning authority does not impose unnecessarily onerous requirements on developers, and does not seek to replicate the planning application system' (emphasis added).

The Planning Portal also provides Application Type Guidance. This guidance states that:

'Certain forms of telecommunication development, for example, mobile telephone masts, are known as 'permitted development' and subject to prior approval from the local planning authority. The prior approval procedure means that the principle of development is not an issue. The LPA can only consider the siting and appearance of the proposal'.

In light of the above it is considered that the planning assessment of this case should concentrate on whether the proposed installation in terms of its siting and appearance are significant as to outweigh other material planning matters.

The applicant considers the proposals in terms of their size, design and location would have less than substantial harm to the character and appearance of the setting of the Bloomsbury Conservation Area, the Seven Dial Convent Garden Conservation Area and the Denmark Street Conservation Area and adjacent listed buildings.

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The NPPF is pro – development with a '**presumption in favour of sustainable development**' being seen as a golden thread, running through both plan making and decision taking'.

The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

It is not necessary to quote extensively from this document but the following points are highlighted.

National Planning Policy Framework (February 2019)

The government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high-quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 112 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of *reliable* communications infrastructure for both economic growth and social well-being.

The NPPF continues to support the expansion of electronic communications networks at paragraph 112. It notes that 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. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF makes reference to 5G:

'Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)...

With the above in mind, the Government is already forward thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

Paragraph 113 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 116 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining 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.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out- of-date, granting permission unless the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 38 it 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...permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 80 states:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴⁰'...

Footnote 40 of the NPPF states:

'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'.

The NPPF provides guidance on proposals affecting heritage assets. Paragraph 189 states that 'in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 190 goes on to state that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset).

The NPPF goes on to provide guidance on considering the potential impacts of development on heritage assets. Paragraph 193 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. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 196 retains advice provided in the 2012 version of NPPF relating to the degree of harm. It 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, where appropriate, securing its optimum viable use.

The proposed development accords with all these aspects of the NPPF in that it will provide Telefonica with continued and improved network provision within the WC2H area of London bringing a range of associated economic and technical benefits.

Public benefits are defined within the NPPG and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Code of Best Practice on Mobile Network Development in England (24 November 2016)

The Code of Best Practice has been fully revised in November 2016 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information super highway no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2013).

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. The Code also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

Section 2 of the Code highlights the Government's Communications Policy and Planning Policy. It acknowledges that the continued expansion and development of mobile networks is a key element of the National Infrastructure Delivery Plan 2016 – 2021. This recognises that digital communications are now a crucial component of everyday life, with improvements in connectivity being key to a vibrant economy (para 2.1).

Paragraph 2.2 goes on to state that consumers, businesses and public bodies increasingly rely on mobile communications and expect to receive a signal wherever they are. The Code indicates that recent changes in planning policy [and regulation] are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed.

Section 2 of this Code also reiterates NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth.

Section 3 of this Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time due to changes in technology and associated changes in demand. The Code acknowledges that there remains a reliance on radio masts to provide the main umbrella of coverage. Paragraph 3.1 explains that radio signals operate like light and must "see" over

the target coverage area, they cannot be hidden and so there will always be a degree of visual impact.

Paragraph 3.2 clearly indicates that in assessing the visual impact, greater emphasis than previously should now be placed on the radio planning requirements to achieve mobile coverage (as shown in the recent changes to permitted development rights, at the end of November 2016, and the reduced test in the most recent NPPF).

Paragraph 3.3 goes on to highlight that the [operator systems tend to be demand-led or to fulfil coverage obligations. With the ever-increasing demand for data hungry applications available to a range of connected devices, such as smart phones and tablets, the requirement to upgrade and improve networks through changes to existing sites and the development of new sites is constant. As most parts of the country move on to a superfast highway, so the need to bring coverage to 'not spots' (i.e. areas where there is no mobile coverage from any operator) and improve coverage in 'partial not spots' (i.e. where there is some coverage but not from all operators) intensifies.

Paragraph 3.4 of The Code provides advice to local Planning authorities who are concerned about proposals, stating that they should not 'look for problems' but should work proactively with the Mobile Network Operators to find solutions, in line with paragraph 187 of the NPPF.

Section 4 of the Code sets out the evolution of mobile networks from 2G voice calls and text to 4G superfast mobile broadband which are now approximately the same speeds as fixed broadband connection.

Paragraph 4.1 of the Code acknowledges that customer expectations have evolved with technology. The expectation is that they will always be connected and able to access services in exactly the same way as fixed broadband for personal, educational and business purposes.

Paragraph 4.2 acknowledges that data, i.e. using the internet, puts increased demand on capacity and therefore the need for additional base stations to keep abreast of customer demand. Also, 3G base stations, originally using higher frequencies didn't travel as far and therefore each base station covered a smaller area. However, changes in working practices for the operators, in line with national guidance, streamlining networks, sharing base stations has reduced the overall amount of infrastructure required.

The Code goes on to acknowledge that operators maximise the use of their existing network infrastructure for the provision of 4G services and are similarly upgrading their 3G network infrastructure to improve capacity and coverage. However, the revised Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity needs to be enhanced in line with Government commitments and customer demand.

Similarly, some new sites will be required to replace existing sites that are lost, for example, through redevelopment of an existing building. Some masts may need to be redeveloped or replaced to enable an upgrade in services to take place.

Section 5 relates to mobile connectivity in the 21st Century, explaining that mobile phones and other devices are now everywhere. Mobile connectivity is not just making calls and texts but also mobile broadband. The majority of mobile phones in the UK are Internet-enabled smartphones and large numbers of people also now own tablet devices. People are increasingly choosing to access the internet using a mobile device even when they have fixed broadband connection available.

The Code acknowledges that by the second decade of the 21st Century, the greatest increase in traffic across mobile networks was in data i.e. internet use (para 5.3). Paragraph 5.4 states that in terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5% in the Gross Domestic Product per capita, while another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade.

Section 5 of the Code goes on to highlight that connectivity promotes social inclusion. In recent years, more people rely on a mobile phone than they rely on a landline. Furthermore, people on lower incomes are even more likely to live in a mobile only household, or to access the Internet using a mobile connection (para 5.5).

The Code illustrates that mobile connectivity helps in the delivery of public services e.g. to access Central and Local Government via online services, acknowledging that lives are more likely to be saved when a 999 call is made from a mobile than from a landline, Telehealth is becoming increasingly important and text message reminders also improve compliance with medication and keeping NHS appointments.

Good mobile connectivity also promotes sustainability e.g. it reduces the need to travel and thus carbon emissions (para 5.7). The Code continues to support mobile telecommunications network as it is seen as a crucial piece of national infrastructure in economic, community and social terms (para 5.8).

Paragraph 5.9 states that there is a need to continually upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely. This is driven by increasing consumer demand for data, improved connectivity and more capacity, together with Government aspirations for improving connectivity and coverage.

Section 7 of the Code sets out the need for all agencies to work together to deliver connectivity that is essential to the country's economy and society including Central Government which provides the overall strategy for connectivity, mobile operators to deliver the mobile network development through the planning system and helping to identify land and structures suitable for mobile infrastructure. Local Planning authorities can also ensure that the planning function works in tandem with other relevant departments and agencies such as their own economic development departments and appropriate digital connectivity teams in order to facilitate digital connectivity.

The Code provides guidance on siting and appearance principles at Appendix A. It sets out a number of design principles in respect of telecommunications development. However, the code acknowledges that the options for design used by an operator will be affected by site conditions including requirement to link the site to the network, landscape features and coverage and capacity requirements. The main options for the operator include:

- Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator);
- Installation on existing buildings and structures;
- Erecting new ground-based masts;
- Camouflaging or disguising equipment where appropriate;
- Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage).

The Code in Appendix A acknowledges that it has been a long-standing Government policy objective to support the sharing of masts and sites. Operators also aim to site share wherever viable. If operators are able to share sites, and install more equipment on each site, this

reduces the overall visual impact of network infrastructure, because even though shared sites will tend to be slightly bigger, it means that fewer sites are needed to improve coverage and capacity, infrastructure becomes more feasible, and is more cost-effective to deploy. In fact, sharing of sites is now the norm, and network operators now share much of their network infrastructure via joint venture commercial arrangements.

However, the Code also highlights the constraints of mast sharing. Acknowledging that mast sharing may not be an appropriate environmental or technical solution in all cases. Visual intrusion may occur. The Code indicates other constraints which may include:

- Coverage problems – The existing mast may be poorly located or not have sufficient height to give the required coverage;
- Radio interference – Antennas need a separate amount of vertical and horizontal separation. This could lead to the visual impact of the mast significantly increasing;
- Structural Loading – The existing mast may not be able to hold extra equipment. The existing mast may need to be strengthened, redeveloped or replaced with a bigger structure with a consequent effect on visual amenity.

Concerning the erection of new ground-based masts; The Code at Appendix A page 27 provides examples of where the environmental and visual impact of the mast can be greatly reduced. Placing the mast near similar structures. For example, industrial and commercial premises, road signs and lamp posts; Placing a mast within or adjacent to an existing group of trees. This option is more successfully implemented in or near wooded areas. It should also be noted that the top of the mast placed in trees will need to be above the tree-line in order for the equipment to work for the allowance of future tree growth; Using simple and unfussy designs. Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts, and Appropriate colouring. Masts seen against the sky are best left in their galvanised state or painted pale grey. Against a wooded backdrop, a matt green or brown colour scheme would be more applicable.

The Code continues to support sympathetic design and camouflaging including concealing antennas in familiar features such as flagpoles, street lamp posts, telegraph pole style designs and signs.

The Code also provides advice on more sensitive locations including conservation areas and listed buildings. It states that operators may be able to avoid specific locations such as listed buildings, but not an entire protected area. In such cases, they should seek to minimise the impact through sensitive design and appropriate siting of the proposals.

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that “If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

The Local Plan for the Camden area comprises:

- The London Plan: The Spatial Development Strategy Consolidated with alterations since 2011 (Adopted March 2016);
- Camden Local Plan (Adopted 2017)

The London Plan 2016

The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. Policy 4.11 "Encouraging a Connected Economy" recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to secure its long-term growth. The proposed development which would contribute towards achieving this objective by improving connectivity across London is entirely consistent with this policy.

Policy 4.11 – Encouraging a connected economy (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) 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.

1.59 – In the emerging information society, London will need to become increasingly a learning city in which skills and the ability to use information will be essential. This will place heavy demands on education and training resources.

1.60 – Finally, information technology will add to the flexibility of home and work environments but will not replace the need for regular face-to-face meetings. It may lead to work journeys being spread over a longer part of the day, and to more local journeys being made, for example to services and cafes.

Paragraph 7.29 states 'London's built and landscape heritage provides a depth of character that has immeasurable benefit to the city's economy, culture and quality of life. Natural landscapes can help to provide a unique sense of place²²⁷ whilst layers of architectural history provide an environment that is of local, national and world heritage value. It is to London's benefit that some of the best examples of architecture from the past 2000 years sit side by side to provide a rich texture that makes the city a delight to live, visit, study and do business in. Ensuring the identification and sensitive management of London's heritage assets in tandem with promotion of the highest standards of modern architecture will be key to maintaining the blend of old and new that gives the capital its unique character. Identification and recording heritage through, for example, character appraisals, conservation plans and local lists, which form the Greater London Historic Environmental Record (GLHER) are essential to this process'.

Policy 7.8 Heritage Assets and Archaeology states (inter-alia)

"A London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

B Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

Planning decisions

C Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

E New development should make provision for the protection of archaeological resources, landscapes and significant memorials.

The physical assets should, where possible, be made available to the public on-site.

Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset".

London Plan 'Intend to Publish' 2019

Chapter 7 of the London Plan 'Intend to Publish' relates to 'Heritage and Culture'.

Policy HC1 relates to 'Heritage conservation and growth' and states:

A Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.

B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making*
- 2) utilising the heritage significance of a site or area in the planning and design process*
- 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place*
- 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.*

C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process'.

The New London Plan (creates the strongest policies ever for Digital Connectivity.

Policy SI 6 relates to 'Digital connectivity infrastructure' and states:

A To ensure London's global competitiveness now and in the future, development proposals should:

- 1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users
- 2) meet expected demand for mobile connectivity generated by the development
- 3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation
- 4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.

B Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access.

The Camden Local Plan (Adopted 2017)

The Camden Local Plan is the key strategic in Camden's development Plan. It sets out the vision for shaping the future of the Borough and contains policies for guiding planning decisions.

There are no policies specific to telecommunications in the Council's Local Plan. Applications for telecommunications are therefore determined in accordance with more general policies of the Local Plan and NPPF.

The Council's vision for the borough is set out in the Camden Plan. The overall vision of the Camden Plan also acts as the vision for this Local Plan:

'We want to make Camden a better borough — a place where everyone has a chance to succeed and where nobody gets left behind. A place that works for everyone'.

Policy A1 relates to Managing the impact of development. Policy A1 therefore seeks to ensure that standards of amenity are protected. The policy states *'The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity'*.

The photomontages submitted as part of this submittal pack clearly demonstrate that the proposed equipment will not be prominent from street level. The proposed equipment is located on the upper roof level and as such is set back from the building edges. The area until recently was host to existing antenna on Castlewood House, and the proposed equipment on Albion House will appear similar in appearance.

Part D1 of the Local Plan deals with Design, but appears more relevant to large scale proposals.

Policy D2 refers to the 'Historic Environment'. This policy requires development to conserve and enhance the historic significance of the borough's designated assets. The building is located within the setting of numerous conservation areas and listed buildings. As with the existing equipment, the replacement equipment is set well back from the parapet of the building, and as such will not be visible from the street or be visually prominent within the setting of heritage assets. Accordingly, as the proposed upgrade would result in very minor changes to the appearance of the site, the character and appearance of the adjacent conservation areas is preserved.

Policy E1 relates to 'Economic development'. The policy states that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses.

As the proposal is for minor alteration to existing infrastructure, it is considered that the proposal is in compliance with Policy A1, D1 and D2 and E1.

Policy DM1 relates to Delivery and monitoring and advises that the Council will deliver the vision, objectives and policies of the Local Plan by (inter-alia): *'working with a range of partners to ensure that opportunities for creating the conditions for growth and harnessing its benefits for the borough are fully explored; working with relevant providers to ensure that necessary infrastructure is secured to support growth aspirations.'*

Camden Digital Infrastructure Planning Guidance (Adopted March 2019)

The Council has prepared this guidance to support the policies in the Camden Local Plan 2017. It is a formal Supplementary Planning Document (SPD), which is therefore a "material consideration" in planning decisions.

This guidance supports the Camden Local Plan policies E1 Economic development and DM1 Delivery and monitoring. One of the Council's priorities for delivering growth and harnessing its benefits for the borough is securing infrastructure and services to meet the needs of Camden's growing numbers of residents, workers and visitors. The Council aims to enable improved internet access through the acceleration of high speed connectivity, including public wireless systems. Policy E1 specifically expects the applicants to provide electronic communication networks, including telecommunications and high-speed broadband in business premises.

The Key Message of this planning guidance is that the Council will support the expansion of electronic communications networks, including telecommunications and high-speed broadband.

Camden Economic Development: Invest in Camden (<https://www.camden.gov.uk/invest-in-camden>)

The Council's website states:

'Camden's Camden is a world-class centre of business growth and the gateway to Europe and the rest of the UK. Our video showcases the borough, and the advantages for businesses locating in Camden:

Camden Council is committed to working with industry to make Camden the best place in London to do business and to work. Through the Camden Business Board the council is working with business groups to secure inclusive local growth. The Camden Business Charter sets out the commitments of the council and businesses in supporting Camden's dynamic economy, and creating opportunities for residents, entrepreneurs and businesses.

Camden offers twenty two square kilometres of opportunity and diversity in the heart of London. World leading businesses have chosen to base themselves in Camden for its dynamic environment, opportunities for collaboration and access to skilled talent. Camden enjoys high growth industries in bio-medicine, tech, professional services, and the creative industries.

With more universities than anywhere else in the UK, Camden is a centre for learning and skills. It's also the home of the Knowledge Quarter, a collaboration of over 75 academic, cultural, research, scientific and media organisations, united in advancing and sharing knowledge.

Jobs and businesses thrive in our high quality and healthy environment, with excellent transport links and a central location in London. King's Cross, St Pancras International and

Euston stations provide excellent rail connections locally, nationally and internationally, as well as direct access to three of London's five airports'.

The Council does not have a policy that deals specifically with issue of telecommunications. Accordingly, development proposals are determined in line with NPPF as well as general design, conservation and delivery policies of the Local Plan A1, D1, D2, E1 and DM1.

Policy 4.11 of the London Plan is also relevant to the proposals and supports the delivery of adequate and suitable network connectivity across London.

Planning Assessment

The following paragraphs set out how the application complies with the NPPF, The Code of Best Practice and the Camden Local Plan. The requirement for the replacement and new capacity and coverage is urgently required (as clearly evidenced in the attached coverage plots). As already explained earlier, the removal of the former site at Castlewood House has instigated the need for a replacement installation for Vodafone Limited and Telefonica UK Ltd.

The proposed equipment relocated from Castlewood House fully complies with the objectives of the NPPF. Government guidance states that in order to limit visual intrusion the number of radio and telecommunication masts and the sites should be kept to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need of a new site has been justified.

This radio base station will enable Telefonica and Vodafone to maintain services in the New Oxford Street and St Giles High Street area, in line with the NPPF. The Code of Best Practice also acknowledges that new sites are necessary when existing sites are no longer available. The operators' license obligations requires them to meet customers "reasonable demand". Reasonable demand would be to provide indoor coverage as customers expect to be able to use their handsets indoors. The operators also have a competitive market driven "requirement" to provide a high-quality service.

The main matter for consideration is whether the proposed siting, size and design of the telecommunications equipment would be out of keeping with the character and appearance of the mixed-use area, resulting in significant harm to the character and appearance of the adjacent conservation areas and adjacent listed buildings. Would this harm outweigh the significant social and economic benefits associated with the replacement and increased service provision attributed to the proposal and other valid material considerations as outlined within NPPF regarding a reduction in mast proliferation through mast sharing.

Policy D1 of the Local Plan relates to large scale developments but and requires development to be of a high standard. The proposal accords with Policies D1 in that the antennas are located in sets of threes and are located behind the plant screen on the plant level. Given their distance above ground level, the antennas would not be visible from ground level. This point is demonstrated by the Lind of Site plans which formed part of the application. As such, they have been designed and sited to minimise the visual impact on the character and appearance of the conservation area. Consequently, they will preserve the character and appearance of the setting of the Bloomsbury Conservation Area, Seven Dial Convent Garden Conservation Area and the Denmark Street Conservation Area. This is in full accordance with Policy D1 and D2 of the Local Plan.

This is a well-considered design, which conforms specifically to NPPF in the determination of

this planning application. However, the Council's local policies are not designed to meet the particular requirements of the local need to maintain and expand the mobile phone network.

Telecommunications antennas are essential infrastructure to enable the mobile network to function. Similarly, plant rooms and air conditioning units are essential infrastructure but will not necessarily create places that are locally distinctive, people friendly, provide natural surveillance, nor improve the built character and quality of an area and the way it functions. Indeed, few if any essential rooftop infrastructure in the vicinity of the site enhance the character, quality or function of the area.

The installation of 10 no. pole mounted antennas and 2 no dishes designed to be as similar as possible to other roof top infrastructure found in the immediate area, will be no more at odds with the streetscene and character of the area than other existing equipment located on rooftops such as plant rooms and air conditioning units.

It is accepted that the height of the proposed installation is taller than upper roof level of the host building. The operators have minimised the siting and appearance of the equipment by attaching the pole mounts to the existing steel grillage. The fact the equipment is taller than the upper roof level is not a valid reason to conclude that it is not appropriate at a specific location. Telecommunications apparatus by its very nature must be taller than surrounding built and natural form to ensure its efficient operation. To suggest that it is inappropriate because it is potentially visible, (if you crane your neck in an unnatural stance), is no more relevant than suggesting that plant rooms are inappropriate because they are taller and bulkier than existing rooftops. It would be very unusual for anyone to be craning their necks upwards to the top of this building, especially considering the very busy activity at street level, along the vibrant area of St Giles High Street.

NPPF at Paragraphs 184-192 advises 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. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. The impact of the proposal on the character and appearance of the setting of the adjacent conservation areas and listed buildings would be less than substantial.

Although the upper roof level is 46.50m and the top height of the antennas is 52.10m these antennas will not appear prominent in public vantage points as demonstrated in the photomontages which form part of this submittal pack.



Image 9: View of the equipment from Denmark Street Conservation Area

Fundamentally, given the distance to the roof edge, the building mass of the host building and the height above ground level these proposed antennas will hardly be noticeable once in situ. At some 52.10m above ground level such a minor scheme will be virtually imperceptible to the naked eye. As such, the proposals should not be considered negatively due to these antennas being marginally taller than the existing upper roof level.

Reasonable consideration of the proposal in the context of adjacent rooftops can only conclude that the presence of other rooftop equipment in the immediate area only seeks to provide a setting wherein a base station may appear more congruous from which to provide an important service to a wider area.

The Councillor's Guide to Digital Connectivity notes that a survey conducted by the Confederation of British Industry found that 81% of firms said that they see more reliable mobile connectivity as essential. Studies have also shown that mobile broadband is associated with positive impacts nationally, such as higher GDP and increased employment.

Therefore the Government fully supports high quality communications infrastructure, even more so with the advent of 5G. The NPPF continues to strongly support telecommunications connectivity and states at paragraph 112 that local planning authorities should support the expansion of electronic communications networks. It acknowledges that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.

The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.

Being able to use smartphones, and other mobile devices such as tablets whenever and wherever you are is essential for the community as a whole. Indeed, there are some users who rely solely on their mobile devices as their form of communication and do not have a landline. As such, to be unable to use their handsets would render them unable to call upon the emergency services should they need to, potentially putting their lives at risk.

The area is currently suffering from a fundamental loss of service. This will result in significant and ongoing detrimental social and economic impacts should a replacement not be found.

The proposed equipment will meet the aspirations of NPPF which encourages the use of sympathetic design and camouflage to minimise the impact of the development on the environment as well as the utilisation of existing masts.

The proposal will help to meet the license obligations and continue to meet the reasonable customers' demands which include being able to access their mobile phone whenever and wherever they are. The equipment relocated from the Castlewood House will continue to enable the operator to provide a high-quality service to its customers and access to the latest technologies.

Economic and Social Benefits

The NPPF strongly supports sustainable development as does the London Plan and Council's Local Plan and Digital Strategy. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with the NPPF and the Council's Development Plan to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

It is therefore clear that the Government places significant importance on reliable communications and as such the Planning Inspectorate gives significant weight to the public benefit arising from local service provision. The issue of benefits and planning balance is considered in Appeal Ref: APP/L1765/W/18/3197522 Land at junction of Andover Road and Athelstan Road, Winchester. The proposal related to the installation of a 17.5m street works pole and associated equipment cabinet at land at the junction of Andover Road and Athelstan Road, Winchester.

The Inspector found at Paragraph 9 *'The Government places a high priority on the provision of high- quality communications. The National Planning Policy Framework (the Framework) at 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". In this instance, the proposal is not so much seeking to provide significantly higher standards but to maintain recent local provision of 2G, 3G and 4G services as a result of a notice to quit from a nearby*

site that was providing these services. The Council has commented that service provision would be 'adequate' without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision'.

The issue of benefits and planning balance was also considered in Appeal Ref: APP/X5990/W/16/3162918, 55 – 59 Oxford Street, London, W1D 2EQ. The Inspector found at Paragraph 20:

'Whilst I have paid special attention to the desirability of preserving or enhancing the character and appearance of the conservation area, the above factors lead me to conclude that there is less than substantial harm to the character and appearance of the existing building and the Soho Conservation Area'.

The proposal related to the installation of 9 no antenna inside a 'replica' GRP extension to the plant room. Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

There is a demand for mobile connectivity in areas where geography, logistics or economics – or a combination of all 3, make it difficult. Mobile network capacity needs to grow to meet the demand of mobile users, who are consuming ever increasing amounts of data.

Paragraph 38 of the revised NPPF 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...permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.

Maintaining high quality 2G, 3G and 4G coverage and capacity whilst also providing new 5G services in this area fully me this part of the NPPF. The social and economic benefits are a significant material consideration which should be weighed against the visual impact associated with a radio base station in this location. HM Treasury outlined such benefits in its report 'Fixing the Foundations: Creating a More Prosperous Nation' – July 2015. Paragraph 7.1 of the plan stated that 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.

Paragraph 7.2 goes on to highlight strong support for high quality communications infrastructure. It states

'by reducing 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 March, of near universal 4G and ultrafast broadband coverage.'

Indeed, MPs have noted in parliament that the UK's Superfast Broadband connectivity was 'relatively poor'. As such, there is continuing and growing strong national support for high quality communications infrastructure. Further to the Government's commitment to improve connectivity, on 24th November 2016 the new permitted development rights for telecommunication operators came in to force, designed to lift the restrictions on mobile operators such as the significance and weight the Government place upon the benefits attached to modern connectivity.

In October 2016, there was also the BIG Infrastructure Group (as Chaired by MP Grant Shapps) Report release calling on operators to improve their network. This is signed and has comments from numerous MP's nationally.

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016 ([https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-\(1\).pdf.aspx](https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-(1).pdf.aspx)). It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

'A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global market place. Securing digital connectivity is thus critical to the UK's long-term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases'.

The Assessment goes on to note that 'Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy'. Therefore, this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of maintaining high quality 2G, 3G and 4G coverage to this very busy area of the capital, where the social and economic benefits outweighed the environmental considerations.

Ministers from the DCMS and MHCLG wrote to all CEOs of Council's in England (March 2019) setting out its position in respect of supporting investment in high-quality, reliable digital connectivity. The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion. Ministers state:

'It is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. As outlined in the Future Telecoms Infrastructure Review, the Government would like to see nationwide full fibre coverage by 2033. We would also like the UK to be a world leader in 5G, with the majority of the population covered by a 5G signal by 2027. We are writing to ask for your help in supporting the investment necessary to achieve these objectives.

Recent years have seen substantial investment in mobile and fixed digital infrastructure across the UK.

While mobile coverage across the UK has been significantly improving, there are still too many areas where coverage is poor. The UK has now achieved 95% superfast broadband coverage but still only 6% full fibre coverage.

We need to create the market and policy conditions necessary to support the large-scale commercial investment required to extend and future-proof digital connectivity. A key part of this is making it easier for operators to deploy infrastructure. To help to achieve this, the Government recently reformed the Electronic Communications Code - the statutory framework which underpins agreements between communications network providers and those in both the private and public sector who can provide sites for the installation of network equipment. The purpose of the reforms was to make it easier and more cost effective for communications network providers to deploy and maintain digital infrastructure.

Local authorities have an essential role to play as site providers. As Chief Executives, you can support investment in digital communications infrastructure by ensuring your organisations have policies and procedures in place that promote effective engagement with the digital communications industry and minimise barriers to deployment'.

The COVID-19 pandemic, stresses the benefits of the infrastructure allowing people to stay connected when they cannot go to work, school or socialise. This physical infrastructure makes it possible for people to work from home, children to continue their education from home and for everybody to stay in touch. Governments across the world have urged their people to stay at home and only to leave for essential shopping or medical needs. Many people are self isolating or in quarantine. Employers were requested to allow home working and many schools moved their lessons online by providing virtual instruction or assignments. In these times of social distancing, connectivity, including mobile connectivity, has become more important than ever. When social contact is restricted, people turn to face-time calls using various applications on their mobile phones.

For the first time in history, all of mobile networks sent out a government message to their customers with details of the new shutdown measures. The message from 24 March 2020 reads: 'GOV.UK CORONAVIRUS ALERT. New rules in force now: you must stay at home. More info and exemptions at [gov.uk/coronavirus](https://www.gov.uk/coronavirus) Stay at home. Protect the NHS. Save lives'. Even the World Health Organisation launched a WhatsApp chatbox allowing people to get instant information about the coronavirus through the smartphone messaging application. None of this would be possible without the physical infrastructure associated with mobile phone industry such as masts, antennas, microwave dishes and cabinets.

Health and Safety

The proposed installation conforms to current government planning guidelines regarding potential health effects arising from telecommunications development. The operator has attached a declaration that the site conforms to ICNIRP guidance. This is in full accordance with NPPF.

Recent court cases have confirmed that the *public perception* of health risks can be a material consideration within the land-use planning system. The weight to be attached to this issue has to be determined accordingly in each case by the decision maker. It has been generally held, and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been demonstrated that the proposed installation will comply with the ICNIRP guidelines.

The publication of the National Planning Policy Framework continues to highlight the Governments view that the planning system is not the appropriate mechanism for

determining health safeguards. It sends a clear message to local planning authorities stating that they 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'**. This is reiterated in the Code of Best Practice.

In this instance, Telefonica and Vodafone believe that it is not necessary to consider health effects further, as recommended by NPPF. The operator is committed to ensuring that all new and existing installations are ICNIRP compliant, and consequently it is considered that there is no basis for this application to be refused on health and safety grounds or for reasons relating to public concerns about health and safety. ICNIRP compliance certificates are enclosed for the operator with this application. If required, additional information regarding the operation of mobile telephone base stations and health and safety considerations can be provided.

Summary

The following conclusions have been reached:

It has been demonstrated that the proposed scheme is in full accordance with the NPPF. The limited harm caused by the installation would not outweigh the benefits of retaining, enhancing and providing new community facilities, and that maintaining and enhancing 3G/4G and new 5G communications network in this area would bring. It has been shown that such provision is essential for sustainable economic growth and plays a vital role in enhancing the provision of local community facilities and services in full accordance with Policy 4.11 of the London Plan.

The proposed rooftop installation has been sympathetically designed and sited so as not to look incongruous in the streetscene and will resemble the existing rooftop infrastructure. As such, the proposed scheme would integrate well with the existing rooftops and streetscene. The antennas as such would not result in a particularly dominant structure incongruous with its surroundings. It would not cause detrimental harm to the overall character and appearance of the host building or the setting of adjacent heritage assets. The proposed scheme will also be in full compliance with The Code of Best Practice which encourages installations to be located on existing buildings and Paragraph 196 of the NPPF that advises that when less than substantial harm to the significance of a designated heritage asset is identified, the harm should be weighed against the public benefits of the proposal.

The proposed scheme will not represent a prominent and alien feature out of character with the locality, by reason of its design, scale and siting.

The proposal will not cause a detrimental loss of visual amenity to the surrounding area.

It has been demonstrated that the proposed 52.10 height is the lowest possible that will allow both operators to obtain their required replacement indoor 3G/4G coverage/capacity and new 5G services to the surrounding predominantly mixed-use area.

There are no more sequentially preferable sites that would provide the required replacement 2G/3G/4G services and enable 5G coverage to be provided that would cause less visual harm than this proposal.

It has been demonstrated that the installation of the new telecommunications radio base station in this location will secure urgently required replacement continuous 3G/4G services and new 5G coverage within the local area following the decommissioning of the permanent shared site at Castlewood House. An installation in this location will provide security for the operators and their customers for continuous 3G/4G provision (coverage and capacity) as well

as the opportunity to provide 5G services to this area of London. As such, it will allow the operators to maintain, as well as expand, the electronics network for two operators, carrying significant economic benefits, including facilitating home working (which in turn has its environmental benefits through reducing the need to travel) easier access to emergency services, social inclusion, greater connectivity for businesses to their suppliers, customers, operating systems etc. to name just a few. This is in full accordance with the NPPF which states that advanced, high quality communication infrastructure is essential for sustainable economic growth.

The proposal will replace, improve and provide replacement and upgraded 3G/4G coverage for Vodafone and Telefonica as well as new 5G services in this area of St Giles High Street, London.

It has also been demonstrated that the proposed development will cause less than substantial harm on the significance of a designated heritage asset, and that this less than substantial harm to the host building or the character and appearance of nearby heritage assets is far outweighed by the social and economic benefits of the proposal.

Confirmation that submitted drawings have been checked for accuracy

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