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| **SUPPLEMENTARY INFORMATION** |

1. Site Details

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| Site Name: | Battlebridge House | Site Address: | Battlebridge House, 300 Grays Inn Road, Swinton Street, London, Greater London, WC1X 8DU |
| National Grid Reference: | E: 530604  N: 182699 |
| Site Ref Number: | VF 1546 | Site Type:[[1]](#footnote-1) | Macro |

1. Pre Application Check List

**Site Selection**

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| Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority? | Yes | **No** |
| If no explain why:  Existing base station | | |
| Were industry site databases checked for suitable sites by the operator: | Yes | **No** |
| If no explain why:  Existing base station | | |

**Site Specific Pre-application consultation with local planning authority**

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| Was there pre-application contact: | Yes |
| Date of pre-application contact: | 01/04/2020 |
| Name of contact: | Head of Planning |
| Summary of outcome/Main issues raised:  A pre-application consultation email was sent to the LPA on the 1st of April 2020 which outlined the need to the upgrade to the existing base station in the area in order to facilitate improved network coverage.  To date no site specific comments were received and therefore, it was considered that the proposal subject to this application would be advanced in order to seek the formal determination of the Local Planning Authority. | |

**Community Consultation**

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| Rating of Site under Traffic Light Model: | Red | Amber | **Green** |
| Outline of consultation carried out:  A pre-application consultation email was sent to the Ward Councillors on the 1st of April 2020 which outlined the need to upgrade the base station in the area in order to facilitate improved network coverage, a description of the draft proposal have been included. | | | |
| Summary of outcome/main issues raised (include copies of relevant correspondence):  To date no site specific comments have been received. | | | |

**School/College**

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| Location of site in relation to school/college (include name of school/college):  No school was considered to have either a direct or functional relationship with the site. |

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

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| Will the structure be within 3km of an aerodrome or airfield? | Yes | **No** |
| Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified? | Yes | **No** |
| Details of response:  N/A | | |

**Developer’s Notice**

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| Copy of Developer’s Notice enclosed? | | **Yes** | No |
| Date served: | 06/04/2020 | | |

1. Proposed Development

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| The proposed site: |
| The proposed site is found at Battlebridge House, Swinton Street, London, WC1X 8DU. It is of note that Battlebridge House is set out over 7 floors and lies within Bloomsbury Conservation Area.  For reference purposes only please see below a photograph of the site: - |

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| Type of Structure *(e.g. tower, mast, etc): Rooftop* | | |
| Description:  1No. antenna to be wall mounted on new steelwork (approximately 2 meters in height), 1No. antenna to be located on new freestanding frame (approximately 2 meters in height) and 1No. antenna to be located on existing support pole. Installation of 14No. ERS units, changes to be made internally to existing cabin, together with other ancillary development thereto. | | |
| Overall Height: 29.5 Metres | | |
| Height of existing building *(to top of existing equipment cabin):* | | 32.0 Metres |
| Materials *(as applicable):* | | |
| Tower/mast etc – type of material and external colour: | Galvanised steel support frames. Antennas left in manufactured grey finish (RAL 7035) | |
| Equipment housing – type of material and external colour: | Galvanised steel – painted grey (RAL 7035) | |

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| Reasons for choice of design, making reference to pre-application responses: |
| The proposed apparatus is to be installed at a height of 28.50 and 30.70 metres respectively so as not to compromise on the centre line of the antennas when taking into account the extent of surrounding obstacles that they need to clear, coupled with the extent of the target area in relation to neighbouring sites within the operator’s single grid network, ensuring the Bloomsbury conservation area is preserved whilst ensuring reliable mobile digital connectivity. In this regard, the lowest possible height for the antennas has been progressed here so as to present the optimum angle of projection that allows the antennas to see the target audience as much as possible and so enable a reliable signal to propagate across the target area. Taking this into account and to justify the design yet further, it should be recognised that should the applicant pursue a structure any lower, then this would have a direct impact on the proposed base station performance making it an unsuitable option for the operator to invest in. Its footprint of coverage would be greatly reduced and it may result in the need for another new base station in the area, rather than as proposed just one, so preventing the proliferation of telecommunication in the area. In this respect the height and design of the proposal presents the optimum technical solution and negates the unnecessary need for additional base stations to serve the target audience.  The design of the proposal takes into account the overall building height and the immediate natural and built clutter. The proposed antennas and their positions on the building offer a technically preferred solution, in which where possible the antennas will be titled and orientated so as to provide cell specific coverage to the demands of the target area of King's Cross. Taking into account the existing arrangement of the building as well as the character and appearance of the Conservation Area, the extent of development has been kept to a minimum, and where possible existing steelwork / cabin space has been utilised.  In light of the above and the site's context, it is considered that the design of the proposed additional equipment of the base station itself and the ancillary development associated will have a minimal impact upon the visual amenity of the area. The proposal as a whole is justified and strikes a good balance between technical constraints and environmental considerations. Furthermore, it is considered that there is a raft of material considerations that act in favour of this case which would outweigh any resultant minimal harm identified. |

**Technical Information**

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| International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)  International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.  When determining compliance the emissions from all mobile phone network operator on or near to the site are taken into account.  In order to minimise interference within its own network and with other radio networks, Vodafone Limited operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision  As part of Vodafone Limited’s network, the radio base station that is the subject of this application will be configured to operate in this way.  All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.  The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest. | **Yes** | No |

1. Technical Justification

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| Reason(s) why site required e.g. coverage, upgrade, capacity |
| An upgrade at this radio base station site is required in this location in order to provide improved network coverage and capacity, as well as catering for added multiple technologies, most notably 5G for Vodafone.  Details regarding the general operation of the Vodafone networks can be found in the accompanying document entitled ‘General Background Information for Telecommunications Development’. This information is provided to assist the Local Planning Authority in understanding any technical constraints on the location of the proposed development. Supporting information can also be found in the attached CTIL document called ‘Radio Planning and Propagation’, which discusses how radio networks are planned, the need for height and the limitations associated with the technology.  Furthermore, the new Code of Best Practice on Mobile Phone Network Development published by the Mobile Operators Association (MOA) in November 2016 explains the special operational and technical considerations, which the telecommunications industry encounters. It also details the evolution of mobile networks and discusses the implications of mobile connectivity in the 21st Century. The new Code of Best Practice on Mobile Phone Network Development explains how mobile networks function and the challenges faced in providing sufficient signal, coverage and capacity to supporting customer experiences.  *3.1 “There are many special operational and technical considerations associated with mobile network development and these have changed over time as the technology and demand for services have changed … As 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.”*  *3.2 “The reduced test in the most recent NPPF and the current changes in Permitted Development Rights (‘PDRs’) signal that, in assessing the visual impact, greater emphasis than previously should now be placed on the radio planning requirements to achieve mobile coverage”.*  *3.3 “The 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”.*  Mobile UK in their publication Councils and Connectivity - How local government can help to build mobile Britainstates:- *“The UK’s mobile connectivity is getting better and better. Indoor call coverage from all four mobile networks is now available in 92% of UK premises; data coverage from all operators is now available in 88% of UK premises. This has been achieved by the mobile industry investing billions of pounds every year into network capacity, coverage and capability.*  *The investment in mobile infrastructure will continue and it will evolve. Just as the use of 4G mobile technology becomes widespread, the adoption and use of 5G mobile technology needs to be planned and implemented. Getting this right is important for three reasons:*  *1. 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.*  *2. 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.*  *3. 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.*  *The mobile industry has been able to enhance mobile connectivity across most of the country. But there is more to be done:*  *• There is demand for mobile connectivity in areas where geography, logistics or economics – or a combination of all three – make it difficult.*  *• Mobile network capacity needs to grow to meet the demand of mobile users, who are consuming ever increasing amounts of data.*  *Local government has a key role in addressing these issues because the mobile industry cannot address them alone. Therefore, this report makes recommendations and offers guidance for how mobile network operators and local government can collaborate to create an environment that encourages the build of mobile infrastructure. The recommendations and guidance are presented under three themes:*  *• Adopting a proactive approach – Leadership and political will can provide impetus that improves the mobile connectivity outcomes for residents.*  *• Planning for the long-term – Because of its importance to economic outcomes, mobile connectivity needs embedding into every aspect of local government’s strategic thinking.*  *• Build partnerships and share best practice – The full potential of mobile connectivity cannot be realised unless there is collaboration and exchange of ideas.*  *The recommendations and guidance under these themes have been designed so that they can be applied despite significant financial pressures faced by local government, e.g. Local Authority spending on planning and development services fell by more than 50% in real terms between 2011-12 and 2016-17.*  *It is important to note that alongside the recommendations made in this report other improvements are required to streamline network rollout – such as reduced regulatory burdens, a consistent planning regime, and a supportive tax system. As such, while the recommendations discussed in this document will provide opportunities to improve the environment mobile operators and local government work within, they are not guarantees to enhance connectivity and coverage.”*  Ofcom in July 2019 published the Communications Market Report 2019 which reviewed the media and communications markets in detail and highlighting the changes in consumer usages and challenges these present to mobile phone operators:-  *“*  *“The total volume of voice calls has fallen, but people are using their mobiles more for calling – and using their landlines less. The volume of minutes originating from fixed-line connections fell again in 2019 (by 17%), while the volume of minutes originating from mobiles went up by 5%.*  *Nearly three-quarters (72%) of mobile connections were 4G at the end of 2018, up from 66% a year previously. EE and Vodafone have already launched commercial UK 5G services, with Three’s 5G network due to go live in August 2019 and O2’s later in the year.*  *Average fixed and mobile data consumption increased rapidly in 2018, with average data use per fixed broadband line increasing by 26% to 240GB per month, and average monthly use per mobile data connection increasing by 25% to 2.9GB.*  *While data consumption grows rapidly, total voice usage continues to decline, and it continues to shift from landlines to mobile: the total volume of outgoing calls from fixed lines fell by 17% in 2018, while mobile-originated call volumes increased by 5%.*  *Widespread smartphone take-up means that consumers have access to other forms of communication such as email, web-based messaging services (e.g. WhatsApp and Facebook Messenger) and social networking sites. This contributed to a further decline in the use of SMS and MMS messages in 2018, down by 5 billion messages (6%) to 74 billion in 2018”.* |

**Site Selection Process**

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| Alternative sites no considered as this proposal related to an existing CTIL, Telefonica (02) and Vodafone base station. |
| Environmental Information (refer to Section 2 of Site Finder Report):  The site is found upon a relatively tall building which is 7 storeys in height. The application site is positioned along a main arterial route through the operators intended coverage area which is urban in character. |
| Land use planning designations;  The application site lies within the Bloomsbury Conservation Area and is close to grade 2 listed residential housing.  In this regard the impact of the development, whether that be positive, negative or neutral on the site’s land use designation will be considered in more detail in the Planning Assessment section of this Supplementary Information submission. |

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| Additional relevant information (include planning policy and material considerations):  **Local Planning Policy**  It is acknowledged that the Council’s approach to the plan-led system has evolved over the years. The Core Strategy is normally the key document that forms the new Development Plan and this is supported by various types of detailed information about the local and sub-regional matters. As a result decisions will be made in accordance with the adopted Development Plan and/or saved policies unless material considerations indicate otherwise.  In this regard, the Local Plan has now been adopted by the Council, in which there is no planning policy adopted that is specific to telecommunications development. Therefore the guidelines from the NPPF have been used.  **Policy D1 Design**  The Council will seek to secure high quality design in development. The Council will require that development:  a. respects local context and character;  b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;  c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;  d. is of sustainable and durable construction and adaptable to different activities and land uses;  e. comprises details and materials that are of high quality and complement the local character;  f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;  g. is inclusive and accessible for all;  h. promotes health;  i. is secure and designed to minimise crime and antisocial behaviour;  j. responds to natural features and preserves gardens and other open space;  k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,  l. incorporates outdoor amenity space;  m. preserves strategic and local views;  n. for housing, provides a high standard of accommodation; and  o. carefully integrates building services equipment.  The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.  **Policy D2 Heritage**  The Council will preserve and, where appropriate, enhance Camden’s rich  and diverse heritage assets and their settings, including conservation areas,  listed buildings, archaeological remains, scheduled ancient monuments and  historic parks and gardens and locally listed heritage assets.  Designated heritage assets  Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:  a. the nature of the heritage asset prevents all reasonable uses of the site;  b. no viable use of the heritage asset itself can be found in the medium  term through appropriate marketing that will enable its conservation;  c. conservation by grant-funding or some form of charitable or public  ownership is demonstrably not possible; and  d. the harm or loss is outweighed by the benefit of bringing the site back  into use.  The Council will not permit development that results in harm that is less than  substantial to the significance of a designated heritage asset unless the public  benefits of the proposal convincingly outweigh that harm.  Conservation areas  Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. In order to maintain the character of Camden’s conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.  The Council will:  e. require that development within conservation areas preserves or, where  possible, enhances the character or appearance of the area;  f. resist the total or substantial demolition of an unlisted building that  makes a positive contribution to the character or appearance of a  conservation area;  g. resist development outside of a conservation area that causes harm to  the character or appearance of that conservation area; and  h. preserve trees and garden spaces which contribute to the character  and appearance of a conservation area or which provide a setting for  Camden’s architectural heritage.  **National Planning Policy Framework (2019)**  It is recognised that in seeking to adopt a new Local Plan and Core Strategy national guidance on the matter suggests that repetition, should be avoided thus the most up-to-date policy stance regarding telecommunication development should be taken from National Planning Policy Framework.  10. Supporting high quality communications  *112. “Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).*  *113. The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.*  *114. Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:*  *a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*  *b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.*  *115. Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:*  *a) the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and*  *b) for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or*  *c) for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure*  *and a statement that self-certifies that, when operational, International Commission guidelines will be met.*  *116. Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure”.*  16. Conserving and enhancing the historic environment  *193. “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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*  *194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*   1. *grade II listed buildings, or grade II registered parks or gardens, should be exceptional;* 2. *assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks or gardens, and World Heritage Sites, should be wholly exceptional.*   *195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply;*   1. *the nature of the heritage asset prevents all reasonable uses of the site: and* 2. *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that Weill enable its conservation; and* 3. *conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and* 4. *the harm or loss is outweighted by the benefit of bringing the site back into use.*   *196. 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”.*  **Code of Best Practice on Mobile Phone Network Development (2016)**  *1.3 “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.*  *2.1 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.*  *2.2 Consumers, businesses and public bodies increasingly rely on mobile communications and expect to receive a signal wherever they are. Coverage in rural areas is recognised as a vital component for maintaining economic activity and social inclusion.*  *4.1 As technology has evolved, we have been able to do more and more with our mobile devices. Second Generation (2G) technology gave us voice calls and text messages, and Third Generation (3G) gave us access to the Internet and other data on the move. More recently, 4G brings superfast mobile broadband at speeds roughly equivalent to those you would expect from a fixed broadband connection. At the same time customer expectations have evolved with the 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.*  *4.3 In line with the NPPF, Operators anticipate maximising the use of their existing network infrastructure for the provision of 4G services, and are also similarly upgrading their 3G network infrastructure to improve capacity and coverage. However, this does not mean that there will not be a need for any new base stations. 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 existing masts may need to be redeveloped or replaced to enable an upgrade in services to take place.*  *5.1 Mobile phones and other devices are now everywhere. Mobile connectivity is now about far more than simply making calls and texts, but is also about mobile broadband. The majority of mobile phones in the UK are Internet-enabled smartphones, and large numbers of people also now*  *own tablet devices.*  *5.2 Even when they have a fixed broadband connection available, people are increasingly choosing to access the Internet using a mobile device, and the numbers doing so are growing, as ownership of Internet enabled devices rises.*  *5.3 By the start of the second decade of this century, the greatest increase in traffic across mobile networks was in data, i.e. Internet use. As the Government’s productivity plan, ‘Fixing the Foundations: Creating a More Prosperous Nation’ states ‘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’.*  *5.9 Increasing consumer demand, especially for data is putting demands on mobile operators for improved connectivity and more capacity on their networks. This is driven by the widespread adoption of smartphones and the rapid uptake of tablet devices, and the way consumers are now using them, often choosing to do so when they have a fixed connection available. In addition, the Government has ambitious aspirations for improving connectivity and coverage, especially in rural areas. All these factors result in the need to continually upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely.*  *6.6 In urban areas, increased call and data transfer volumes put high demand on the networks, potentially leading to the need for more infrastructure. In some urban areas, such as conservation areas, the number of potential sites suitable for base stations might be constrained”.*  **London Plan (2016)**  The London Plan sets out the Mayor’s planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area, although it is of note that there is a new Draft London Plan that is awaiting adoption. In Paragraphs 1.38-1.41 *‘Ensuring the infrastructure to support growth’*, the London Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that the city requires to secure its long-term growth. Such matters are further echoed by the Mayor’s Offices long term strategy as documented in the London Infrastructure Plan 2050.  It is considered that the Vodafone networks are an integral element in securing the Mayor’s vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in Policy 4.11 ‘Encouraging a Connected Economy’ of the London Plan. Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform in allowing Vodafone to provide additional 3G and 4G coverage to the surrounding area as well as future 5G.  The aim of the Infrastructure Plan is to enable for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 8 of the Plan indicates how the London Mayor’s Office shall support an economically viable mix of technologies including fibre broadband, mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. This document is supported by the report Raising London’s High Speed Connectivity to World Class Level. As detailed within these Digital Connectivity is now considered the fourth utility. Internet access not only affects the productivity of businesses and proves essential to the future growth of many firms, it is also vital for many residents to take part in modern society as more services move online.  The Mayor’s Office shall work with central government and London’s local authorities to ensure that strategic communication networks are enabled rather than inhibited by the planning and other regulatory systems whilst ensuring the utility works themselves are properly managed.  The Vodafone networks are integral elements in securing the Mayor’s vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.  **National Infrastructure Delivery Plan 2016 – 2021 (2106)**  Central Government's Infrastructure and Projects Authority who report to HM Treasury and Cabinet Office have produced a national plan that aims to improve the planning and delivery of infrastructure based projects and in turn will help to increase investment in the UK and accelerate achieving.  Chapter 7 relates to Digital Communications in which it is said in paragraph 7.1 that *"Digital communications are now a crucial component of everyday life. Technologies such as mobile phones and broadband have revolutionised the way we work, socialise and enjoy our leisure time. Improvements in connectivity mean the UK is rapidly embracing a vibrant digital economy, currently worth around £120 billion a year.1 Over 30% of UK premises have taken up superfast broadband and there are more than 23 million 4G subscriptions."*  It then goes on to state in paragraph 7.2 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, open-up access to new markets and support more flexible working practices."*  It is also recognised in paragraph 7.4 that *"Demand for digital services and applications will continue to rise rapidly, with a consequent acceleration in the amount of data being carried over networks. Over the next decade we can expect the emergence of new services, applications and devices which will create additional demands on networks. To support this demand, the UK needs infrastructure that is high capacity, reliable, resilient, secure, affordable and fast."*  It is acknowledged in paragraph 7.10 that *"The government will work to provide greater freedoms and flexibilities for the deployment of mobile infrastructure, including reducing planning restrictions for existing telecoms infrastructure and allowing taller new ground-based masts to be built."*  The National Infrastructure Delivery Plan details key projects and programmes including voice coverage to 90% of the UK geographic area by the end of 2017. With regards 4G rollout it is said that by 2017, 98% of premises should have access to 4G mobile broadband.  **Planning Assessment**  From the outset, it should be appreciated that irrespective of the proposals installation on an existing telecommunications base station, the visibility or a development’s siting and appearance within the context of a sensitive designation, most notably in this instance the site being found within Bloomsbury Conservation Area, does not automatically result in an overwhelming adverse harm to the area. The proposal utilises an existing base station which means additional equipment required has been kept to a minimum.  The proposal will involve the installation of new support structures that are set back from the buildings edge and sensitively sited so as to minimise the visual impact of the base station. In this regard, the applicant has sought to identify locations that firstly meet their technical requirements but also occupy the least prominent positions upon the building that achieve these coverage objectives. Furthermore the additional apparatus would not be seen in isolation given the rooftops layout and current equipment in situ, coupled with their relative height. In light of this, it is considered that every effort has been made to minimise any impact on the surrounding areas.  The proposed ancillary equipment in the form of RRUs, which are small in nature, will be installed on existing freestanding frames and will not be noticeable additions given they will be read at height. The proposed radio equipment cabinets will be installed within an existing cabinet on the upper roof level. The proposed new cabinets will therefore not have a detrimental impact given their internal location.  In this regard, it is the applicant’s opinion that the telecommunication development would not appear untoward upon the host building or within the context of the Bloomsbury Conservation Area and other buildings of historic merit. It is considered that the proposed antennas would be barely noticeable at a casual glance given their siting and size relative to the building from street level. Therefore, the applicant considers that the siting and appearance of the proposed installation would comply with policy D1 and D2 and ensures that the character and appearance of the wider Conservation Area is not undermined.  Indeed, it should be noted that the National Planning Policy Framework (NPPF) advocates that any impact should be weighed against the public benefits of the scheme. It has been clearly demonstrated that there is a well defined technical need for the installation to address the operators coverage needs and that such infrastructure is of benefit to the public that travel through or work within the Kings Cross area.  To expand upon the siting and appearance of the proposed scheme within the context of Article 2(3) land, the applicants search area is contained entirely within Bloomsbury Conservation Area, which contains multiple listed buildings. With this in mind, the applicant has taken every possible steps to ensure that the proposal has been designed sensitively to respect the surrounding environment. The location of the three proposed antennas have been situated in the least obtrusive positions possible in which as previously explained will reduce the visual impact of the base station so far as practicable.  In terms of siting the applicant has taken advantage of the building’s height, whereby it is of note that the proposed antennas will be positioned at the lowest possible height so as not to pierce the roofline of the building and therefore limit long range views. In this regard the proposal will not undermine the character and appearance of the Conservation Area. Similarly, it is considered that the changes to the existing rooftop base station will not appear overly pronounced within the context of host building nor the skyline as the changes are negligible. In conclusion, it is considered that when balanced against all material factors of this case, the proposal’s siting and appearance will not have a significant impact on this building or the surrounding conservation area.  With regards the need for the development it has been highlighted previously that the operator is required to improve coverage in the area to meet existing and future demands of mobile users. Irrespective of a site designation, the public benefits of the telecommunication development in providing coverage and capacity should be seen as a material planning consideration. The use of mobile devices has become an essential part of everyday life for the vast majority of people in the UK.  Indeed, mobile technology is important for personal communications, but it is becoming more and more important for businesses, making a vital contribution to overall economic prosperity. In this respect the network infrastructure development progressed by the operator is largely determined by consumer demand. These customers wish to be able to use their devices wherever they are, in which in designated areas this coverage requirement is no different. Albeit Conservation Areas can present difficulties in terms of their built character, it is considered that the technical needs have been addressed by taking a responsible and sensitive approach to the siting and appearance of this base station development. In this regard it is considered that the wider public benefit of providing multiple technologies is sufficient to outweigh any undue harm to the designated asset.  With regards the proposal compliance with planning policy, it is evident that NPPF, should be given significant weight in the determination of this application. It is considered that the scheme's siting and design, together with justification provided, presents no significant material conflict and accords with national planning policies. As previously highlighted the Code of Best Practice on Mobile Network Development which is a guidance document that should be used by all has updated and is more reflective of today’s current practices. Indeed, the latest version of the Code of Best Practice coincided with the statutory instrument changes to Part 16 that came into force at the end of November 2016. The process taking in advancing this particular scheme has taken a best practice approach in which its sited and designed.  This is the optimum planning option given the scale of the built form and Conservation Area. It is considered that the proposed development is acceptable in this location, and it would not appear visually intrusive and detrimental to the character of the street scene and provide significant public benefits. In light of the case presented above, the applicant considers that the proposal strikes a good balance between environmental impact and the operational considerations of the operator to provide improved network coverage and capacity to this area.  **Health & Safety**  Court cases have confirmed that the public perception of health risks can be a material consideration within the planning system. That said the weight to be attached to this issue has to be determined accordingly in each case by the decision maker when assessing the evidence provided. However, it has been generally upheld and widely established that health concerns are not a sufficient matter alone to refuse a planning application providing it has been demonstrated that the proposed base station will comply with the International Commission on Non-Ionizing Radiation Protection guidelines.  It should be recognised that it has been long since established that it is Central Government's stance that the planning system is not the appropriate mechanism for determining health safeguards. It remains their responsibility to decide what measures are necessary to protect public health. Most notably they take the stance that if a proposed development meets the ICNIRP guidelines for public exposure it should not be necessary for a Local Planning Authority, in processing and determining a planning application to consider further the health aspects and concerns about them.  In this respect the operator believes that it is not necessary to consider health effects further. Vodafone are committed to ensuring that all new and upgraded installations are ICNIRP compliant. In this regard there should be no basis for this case to be refused on health and safety grounds or for reasons relating to public concerns about the perception of health fears. An ICNIRP compliance certificate is attached as part of this submission, as required by NPPF, in which it takes into account the cumulative effect of the radio frequency emissions from the proposed installation. Albeit the proposal has dual user capabilities and seeks to provide multiple technologies, the levels from the proposed development will be many times lower than the ICNIRP standards in all publicly accessible areas around the installation. In the light of this, it is clear that the weight to be given to such health and safety concerns should not be so great as to warrant a refusal of the case on these grounds. |

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1. Macro or Micro [↑](#footnote-ref-1)