

<b>Delegated Report</b>		<b>Analysis sheet</b>	<b>Expiry Date:</b>	<b>18/09/2020</b>
		N/A	<b>Consultation Expiry Date:</b>	<b>03/08/2020</b>
<b>Officer</b>			<b>Application Number(s)</b>	
Matthew Dempsey			2020/2792/P	
<b>Application Address</b>			<b>Drawing Numbers</b>	
110 High Holborn London WC1V 6EU			Site location Plan 100 A, 200 A, 201 A, 300 A, 301 A, 302 A, 403 A, Cover Letter 23/06/2020, Supplementary Information 23/06/2020, Radio Planning and Propagation (V.4 November 2019), Cornerstone: Health and Mobile Phone Base Stations, General Background Information for Telecommunications Development, Declaration of Conformity with ICNIRP Public Exposure Guidelines 23/06/2020, and; Clarification of ICNIRP Declaration.	
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>	
<b>Proposal(s)</b>				
Installation of 6no. antennas, 3no. cabinets and ancillary works thereto at roof level.				
<b>Recommendation(s):</b>	i) Prior Approval Required ii) Prior Approval Refused			
<b>Application Type:</b>	GPDO Prior Approval Determination			

<b>Conditions or Reasons for Refusal:</b>	<b>Refer to Draft Decision Notice</b>					
<b>Informatives:</b>						
<b>Consultations</b>						
<b>Adjoining Occupiers:</b>	No. notified	<b>0</b>	No. of responses	<b>0</b>	No. of objections	<b>0</b>
<b>Summary of consultation responses:</b>	A Site Notice was displayed from 10/07/2020 which expired 03/08/2020.					
<b>CAAC/Local groups* comments:</b> *Please Specify	N/a.					

## Site Description

The application site is a ten storey commercial building of mixed retail and offices uses to the northern side of High Holborn. No.110 High Holborn spans the junction of Proctor Street with vehicular and pedestrian traffic passing beneath. The building is of modern design with glazed frontages to High Holborn and Proctor Street. It is not within a conservation area boundary, however; it is closely surrounded by the Bloomsbury Conservation Area, and there are several Listed Buildings in close proximity.

The application in question relates to the roof top of the building where there is some existing plant equipment in place, As shown by existing site plan, drawing no.220 A. As shown by the existing elevation drawing provided (300 A), all existing equipment is housed behind the parapets.

## Relevant History

No relevant site planning history.

Related Appeal Decisions: **Appeal A Ref: APP/X5210/C/18/3199851 & Appeal B Ref: APP/X5210/C/18/3201008** - Land at Crown House, 265-267 Kentish Town Road, London NW5 2TP. Re: 'installation of communications antennae along with associated fixings and cabling on the flat roof of the commercial building.' (Enforcement Notice Ref: EN17/0611). **Appeal A Dismissed and Enforcement Notice Upheld, Planning Permission Refused. Appeal B Dismissed and Enforcement Notice Upheld. 09/11/2018.**

## Relevant policies

**National Planning Policy Framework (2019)**

**The London Plan (2016)**

**The London Plan (intend to publish) 2019**

**Camden Local Plan (2017)**

- A1 Managing the impact of development
- D1 Design
- D2 Heritage

**Camden Planning Guidance:**

- CPG – Design (March 2019)
- CPG – Amenity (March 2018)
- CPG – Digital Infrastructure (2018)

**Code of Best Practice on Mobile Network Development (November 2016)**

**Bloomsbury Conservation Area appraisal and management strategy (2011)**

## **Assessment**

### **1.0 Proposed development:**

1.1 The application has been submitted under Part 16 of schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order (GDPO) 2015 (as amended). The GDPO sets out the details in regard to the type of development for which planning permission is 'deemed' to be granted, more commonly known as 'permitted development'. In particular, the application seeks determination as to whether the prior approval of the Local Planning Authority is required as to the siting and appearance of the proposed development in relation to telecommunication equipment.

1.2 In this instance, Prior Approval is sought to install new telecommunications equipment at the existing rooftop area of the subject building. This would comprise of the Installation of six antennas, three cabinets and ancillary works such as associated cabling and safety handrail installations.

1.3 Two antennas would be fitted to a pole fixed to the High Holborn side of the roof, and four antennas would be fitted to poles (two antennas to each pole) fixed more centrally at roof level towards the Proctor Street frontage and to a lesser extent towards Catton Street. The three proposed cabinets would also be positioned centrally, adjacent to the cluster of four antennas.

1.4 The existing roof level is approximately 31.5m from ground level. The highest part of the proposed development would be approximately 33.3m from ground level. Cabinets and other equipment would be positioned slightly lower, with an approximate height of 31.8m from ground level.

### **2.0 Extension of time agreed:**

2.1 Officers raised concern about the lack of existing and proposed South side elevations, to describe the works as viewed from High Holborn. These drawings were requested as part of the decision making process.

2.2 The applicant provided a revised drawings package to include the South side elevations. There was no alteration to the initial proposal, only clarification supported by additional drawings with an agreed extension of time until 18/09/2020.

### **3.0 Justification:**

3.1 The proposal is a new installation intended to enhance existing network services by increased capacity and allow for new 5G provision in the area. The proposed development would enable the provision of 2G, 3G, 4G and new 5G services for the Telefonica and Vodafone mobile network in this part of London.

3.2 The applicant has provided evidence to show that they have explored alternative development sites within the vicinity of the proposed site location, and given reasons why these alternative sites were not chosen (see page 13 of Site Specific Supplementary Information document).

3.3 The applicant has indicated that prior to the submission of this application a pre-application consultation was undertaken with the LPA, however; no record or any formal pre-app can be found on the LPA database, as confirmed by the site planning history above.

3.4 The applicants have declared with appropriate documentation that all of the proposed equipment would comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) standards on emission levels in accordance with government guidelines.

3.5 Members of the public cannot unknowingly access areas close to the antennas where exposure may exceed the guidelines. Therefore, the equipment is not anticipated to have any direct impact on public health.

3.6 There would be no impact on residential amenity in terms of loss of light or outlook.

#### 4.0 Siting and appearance:

4.1 The host property is located in a prominent position fronting a main arterial highway and spanning the junction of another busy road. The building is an imposing local structure which contributes to the surrounding roof-scape, being ten storeys in height it is significantly higher than both its neighbouring buildings. The highest elements of the roof can be appreciated in long views from various locations, including both directions along High Holborn and also from Proctor Street to the rear.

4.2 Although the site is not within a conservation area, its' position is such that the site is enveloped by the Bloomsbury Conservation Area on all sides. Furthermore, there are several listed buildings in close proximity, specifically; No.233 High Holborn which is directly opposite, No. 247-252 High Holborn to the South East of the site, and No.114-115 High Holborn to the West (all of which are Grade II Heritage assets), also; Nos.2, 4 & 6 Southampton Row to the North-West (Grade II\*).

4.3 A sample of the street view from High Holborn demonstrating the prominence of the roofscape can be seen below:



Note: There is no visible existing roof top equipment along this stretch of High Holborn. The proposed antennas would be installed close to the parapet edge at a height of approximately 3.2m above the currently unblemished main roof line.

4.4 Policy D1 of the Camden Local Plan seeks to secure high quality design in development. Policy D2 (Heritage) states that the Council will resist development that would cause harm to the significance of a listed building through an effect on its setting, and resist development that causes harm to the character or appearance of conservation areas.

4.4 The proposed telecommunications equipment is considered to cause harm to the character and appearance of the Bloomsbury Conservation Area on account of its prominence in the roofscape, where it would be highly noticeable against the skyline, and; clearly visible from public views close-by and from longer views. Of particular concern, is the proposed installation of equipment fronting High Holborn mounted on a uni-strut pole. Officers note that the scale bar provided on the proposed plans does not appear to be accurate, however; having utilised the above ground level (AGL) measurements provided on the drawing; the height of the proposed equipment fronting High Holborn would be approximately 3.2m above the roofline, and; the cluster of equipment proposed would be approximately 1.7m in width. The cluster of equipment attached to this uni-strut pole would introduce an incongruous addition and this equipment would add visual clutter to the existing 'clean' roofscape

of the property.

4.5 Telecommunications equipment by the nature of the standardised design style and aesthetic may not blend seamlessly with an existing building, however; It is considered that the location, scale, height and design of the proposed equipment would be harmful to the character and appearance of the host building, local views and the character and appearance of the adjacent conservation area.

4.6 The proposed installation is for an entirely new development, as opposed to adding to an existing installation. It would appear that little consideration has been made to enhance the host building or adjacent conservation area, by siting the apparatus sympathetically or proposing any sort of camouflage or screening which may have softened the appearance from street level, nor setting the antennas away from the front elevation in accordance with Section 10 (Telecommunications) of the NPPF (2019).

4.7 It is considered that the location, scale, height and design of the proposed equipment would be harmful to the character and appearance of the host building, local views, the character and appearance of the adjacent Bloomsbury conservation area and the setting of nearby listed buildings.

## **5.0 Planning balance:**

5.1 Considerable importance and weight has been attached to any harm to designated heritage assets, and special attention has been paid to the desirability of preserving or enhancing the character and appearance of the adjacent Bloomsbury Conservation Area in particular, under s.72 of the Listed Buildings and Conservation Areas Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013.

5.2 Local Plan Policy D1, consistent with Section 16 (Conserving and enhancing the historic environment) of the NPPF (2019) which seeks to preserve and enhance heritage assets, states that 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.

5.3 Given the assessment as outlined in sections 1-4 of this report, it is considered that the proposed telecommunications equipment would result in harm to the character, appearance and appearance of the Bloomsbury Conservation Area. It is recognised that the proposed scheme would result in better network coverage, and as such, some public benefit would be derived from the scheme however weighing the harm caused as a result of the development against this public benefit, the proposal is considered to be contrary to Section 16 of the NPPF (2019) which seeks to preserve heritage assets.

5.4 The proposal would therefore fail to accord with policies D1 and D2 of the Camden Local Plan 2017, and Section 16 of the NPPF (2019), The development would create overly dominant visual clutter on a prominent roofscape, causing harm to the host building, local views from the street and to the character and appearance of the Bloomsbury Conservation Area and nearby listed buildings.

## **6.0 Recommendation:**

6.1 Approval Required – Approval refused, on grounds of unacceptable location, scale, height and design.