SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	The Dutch House	Site Address:	307 High Holborn, Holborn, London WC1V 7LL
National Grid Reference:	E 530948 N 181591		
Site Ref Number:	VF 36743	Site Type:[1]	Macro

2. Pre Application Check List

Site Selection

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: n/a		
Were industry site databases checked for suitable sites by the operator:	**Yes**	No
If no explain why: n/a		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	07/05/2020
Name of contact:	Head of Planning
Summary of outcome/Main issues raised: A pre-application consultation email was sent to the LPA on the 07/05/2020 which outlined the need to upgarde the existing base station in the area in order to facilitate improved network coverage, a description of the draft proposal have been included. 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

Rating of Site under Traffic Light Model:	Red	**Amber**	Green

[1] Macro or Micro

Outline of consultation carried out: A pre-application consultation email was sent to the Ward Councillors on the 07/05/2020 which outlined the need to upgrade the existing 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

Location of site in relation to school/college: No school was considered to have either a direct or functional relationship with the site.
Outline of consultation carried out with school/college: N/A
Summary of outcome/main issues raised: N/A

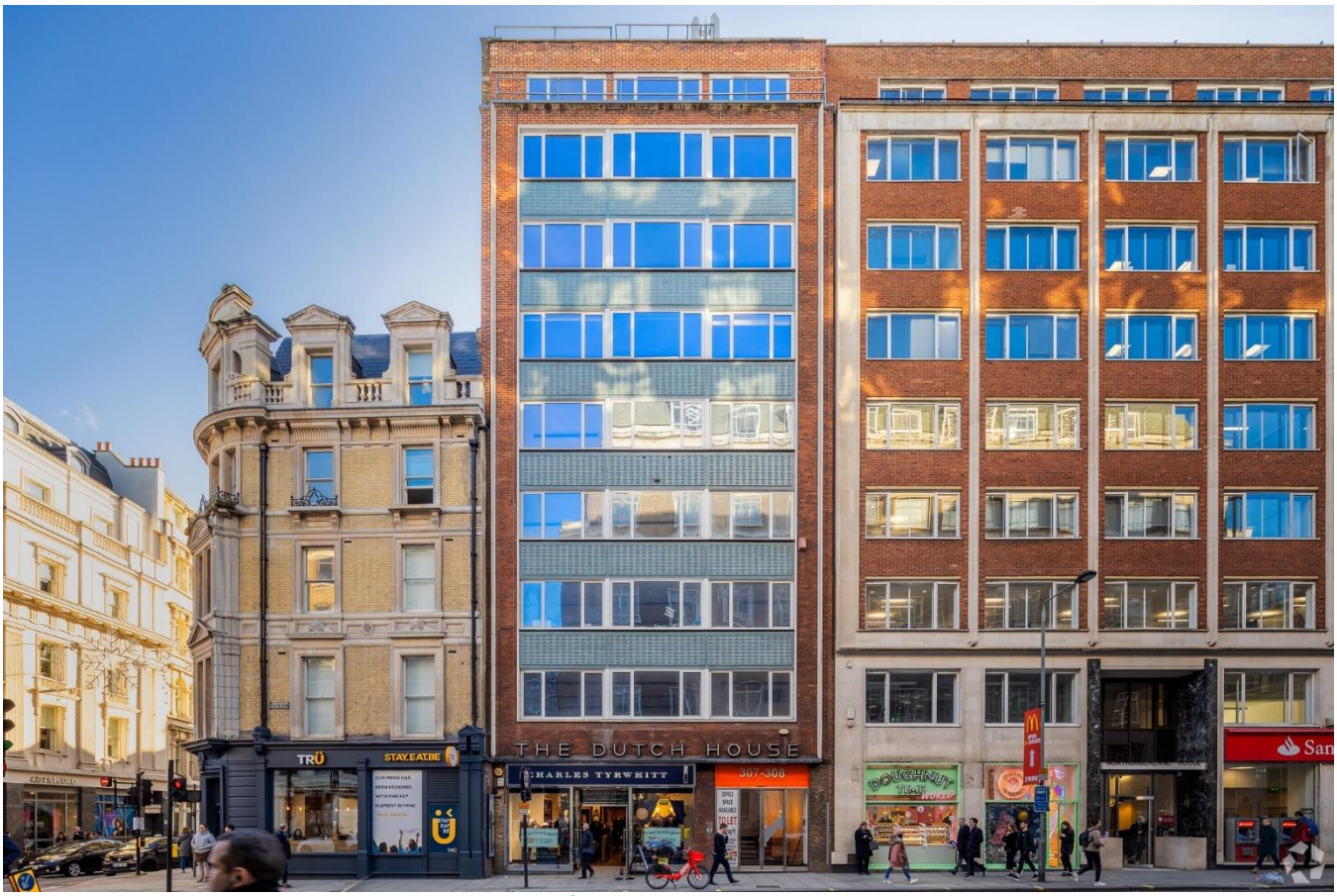
Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation

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

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	**No**
Date served:	11/05/2021 (By email)	

3. Proposed Development

The proposed site:
The proposed site is found at The Dutch House, 307 High Holborn, Holborn, London, WC1V 7LL. It is of note that The Dutch House is situated over eight floors and lies within Bloomsbury Conservation Area. For reference purposes only please see below a photograph of the site: -      Application site: The Dutch House, 307 High Holborn, Holborn, WC1V 7LL

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

Type of Structure*:*	*Rooftop antennas*

Description:
- *The proposed installation of 1 no. antenna to be removed and replaced with 1 no. new antenna on new wall mounted pole at a height of 31.10 metres.* - *The proposed installation of 2 no. antennas to be removed and 2 no. new antennas to be relocated and mounted on proposed tripod fixed to existing steel platform at a height of 31.10 metres.* - *The proposed addition of ancillary development thereto, including but not limited to, 1 no. GPS module, ERS units and cable trays.*

Overall Height:	31.10 Metres
Height of existing building*:*	31.10 Metres to existing antennas (28.70 Metres to Plant Room level)

Materials:	
Tower/mast etc – type of material and external colour:	Galvanised steel – manufactured grey (RAL 7035)
Equipment housing – type of material and external colour:	Galvanised steel – manufactured grey (RAL 7035)

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

A proposed radio base station is required in this location in order to improve both coverage and capacity of the existing network and to future-proof future demands by mobile users with the rollout of 5G. The overall height of the proposed antennas has been kept to its technical minimum given the structure types which are available to the aforementioned operators. The proposed installation is at a height of 31.10 metres so as not to compromise on the centre line of the antennas and to allow for adequate coverage to the target area. The proposed height and structure type will also cater for 4G and future 5G coverage demands which will enable network restructuring towards a single grid network that can serve both operators should Telefonica have a further requirement in this locality in the future.

Technological advances have enabled a mast share structure that breaks the barriers of conventional schemes which in the past would have typically involved an even taller mast height than proposed. This is because as individual operators each have varying technical requirements and there is normally a need for vertical separation between each set of operator's antennas. In this instance the Cornerstone (CTIL) consolidation agreement between Telefónica and Vodafone has allowed both organisations to pool their basic network infrastructure, while still running two, independent, nationwide networks. In this case the environmental benefits have meant the number of antennas and the overall height of the proposals has been kept to minimum.

The proposed apparatus is to be installed at a height of 31.10 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 historic qualities of the conseration area are 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 along Holborn. 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.

It is therefore considered that the proposed telecommunications installation on the roof of the building will have a negligible visual impact on the streetscape and skyline given the scale of the apparatus and their position at height within an urban streetscene, in which it would not be uncommon to find such apparatus.

The proposed antennas will be fixed on to a number of individual support poles spread across the roofline. The proposed antennas will be left in their manufactured grey form so as to reduce their visual prominence against the skyline. In this regard although the proposed antennas will be seen from wider vantage points, it is considered that the level of visual impact has been kept within reasonable bounds when taking into account the extent of development balanced against the operational requirements of the operators. Also the proposed telecommunication development will potentially provide multiple technology platforms for both operators, thus catering for the areas connectivity demands.

In light of the above and the site's context, it is considered that the design 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

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	**Yes**	No

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.		

4. Technical Justification

Reason(s) why site required e.g. coverage, upgrade, capacity

A 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 4G for Vodafone, together with the provision for future 5G.

Details regarding the general operation of Telefonica and 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 Britain states:- *"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."

Ofcome 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

Alternative sites considered and not chosen

Site Type	Site Name & Address	National Grid Reference	Reason for not choosing
	n/a		n/a

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

In accordance with the operators licence obligations, NPPF and the Code of Best Practice on Mobile Phone Network Development, Cornerstone have reviewed existing telecommunications provision operated by Vodafone and Telefónica in the intended target area. An existing base station has been identified, in which taking advantage of the Cornerstone agreement, a sequential approach to site selection has been taken in seeking to upgrade this particular installation. Furthermore it should be acknowledged that alternative sites would have been considered by the operator and determining planning body when this now existing base station was first conceived and established on-site.

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

The site is found upon a relatively tall building, set back from the highway. The application site is positioned along a main arterial route through the operators intended coverage area, which is predominantly urban in character with a variety of land uses including residential, commercial and recreational. The existing telecommunications installation is an established feature within the environment.

Land use planning designations;

It is noted that the application site is found with designated Article 2(3) land, notably being set within the Bloomsbury Conservation Area.

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.

It is recognised that the application site is found within the Bloomsbury Conservation Area and is on the same stretch of road as the Citie of York Public House which is a Grade II Listed Building, in which the surrounding context, together with any other material planning considerations, will also be discussed in this statement.

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 policy specific to telecommunications development and as such the main source of policy guidance is found within the below national planning policy documents.

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.

<u>10. Supporting high quality communications</u>
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:

- *a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- *b) 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;

- *a) the nature of the heritage asset prevents all reasonable uses of the site: and*
- *b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that weill enable its conservation; and*
- *c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- *d) 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 Telefonica and 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 Telefonica and 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 and Telefonica 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

The application site is found upon the roof of The Dutch House, 307 High Holborn, Holborn, WC1V 7LL. The proposed upgrade involves the installation of 1 no. antenna to be removed and replaced with 1 no. new antenna on new wall mounted pole at a height of 31.10 metres, the installation of 2 no. antennas to be removed and 2 no. new antennas to be relocated and mounted on proposed tripod fixed to existing steel platform at a height of 31.10 metres, as well the addition of ancillary development thereto.

From the outset, it should be appreciated that irrespective of the installation's use as a 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 within Bloomsbury Conservation Area, does not automatically result in overwhelming adverse harm occuring.

Nevertheless it is understood that the presence of the existing telecommunications installation on-site may result in a number of preconceptions regarding the proposal now subject to this application. On reflection it should be appreciated that these opinions may actually derive from the previous planning history and or the case presented relating to the siting and appearance of the now existing mast. Irrespective of these viewpoints and what has gone before, it is clear for all to see that the existing base station is now established on-site, in which this provides a good reference point for the upgrade scheme's siting and appearance.

In light of the above it is considered that the planning assessment of this case should concentrate on whether the proposed changes when compared to the existing development are significant as to outweigh any other material planning matters. Indeed it should also be ascertained as to whether there is still a need for the base station, whether the changes can be justified and if there have been any notable changes in terms of the site specific siting and surroundings which should be taken into account. Also the latest proposal subject to this application should be reviewed against the up to date planning policy regarding telecommunications development.

It has been a longstanding Government policy objective to encourage telecommunications operators, wherever viable, to share masts and sites as a means of minimising overall mast numbers. The NPPF states that local planning authorities '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'.

Operators also support site sharing wherever viable. If operators are able to share sites, and install more equipment on each site, as in this case, it reduces the overall visual impact of network infrastructure, because 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, such as Cornerstone (CTIL), the joint venture between Vodafone Ltd and Telefonica UK Ltd.

As discussed previously with regards the choice of design, it is considered that when comparing the appearance of the existing and redeveloped schemes, the proposal will not undermine the visual amenity of the area given the minimal change in form to the existing rooftop apparatus. The proposal has dual user and multi-technology capabilities, whereby the amount of equipment deployed is at its technical minimum and is justified in order

to fulfil the aforementioned network demands. In this regard and when balanced against the other material planning matters as below, it is considered that the overall appearance of the proposal is acceptable.

With regards the need for the development it has been highlighted earlier that the existing base station requires upgrading in order to meet the existing and future demands of mobile users. In this respect it's continue presence and operation is essential in providing network coverage for both Vodafone and Telefónica. The Government encourage the growth and provision of a modern telecommunications infrastructure, in particular 4G and future 5G, in which it should be recognised that mobile coverage is a key component that will aid social and economic prosperity.

The existing radio base station is found upon the roof of Dutch House, 307 High Holborn, in which the surrounding land uses are predominantly commercial and retail uses all of a similar scale and the existing telecommunication installation subject to this application is co-located next to another operator's mast. Operators sharing the existing infrastructure of the co-located Vodafone installation ensures that the physical amount of equipment required on site has been kept to an operational minimum in order to help mitigate its impact. These are all considered features and a context that would help assimilate the base station's change in form into this particular environment. The proposed equipment would be read at height, in which when viewed in perspective and taking into account the relatively small scale nature of the apparatus, it is considered that the proposal would not appear incongruous within the immediate or wider streetscene.

The proposed upgrade in this case can be justified by the technical need for improved coverage together with the need to ensure the antennas of both operators are above the immediate and wider built and natural clutter such as buildings or trees which would interfere with the effective propagation of the radio signal from the antenna. The proposed antenna are marginally larger than the existing antennas in order to accommodate to provide multiple technologies from a single site, whilst they have been positioned on individual support poles to allow for these antennas to be orientated and tilted so as to provide the optimum level of coverage to the area. It is highlighted that it is the technical requirements to deliver multiple technologies for two operators that have dictated the design of the proposal in this instance. It is considered that the proposed change in form from the existing installation is not considered to be so marked that it would appear visually obtrusive given its context and when balanced against the benefits of the proposed upgrade.

In light of the above, it is considered that the upgrade proposal would not be overly intrusive in this particular environment. Taking all matters into account, it is the applicant's opinion that the visual impact as a result of the proposed changes would not outweigh the other material merits of this case.

The proposed ancillary equipment in the form of ERS units, which are small in nature, will be installed adjacent to the antenna and will not be noticeable additions given they will be read at height. The applicant has made every effort to ensure that the form and function of the proposed development is as sympathetic as possible, whereby the operator has sought to design the most discreet solution available to them in order to minimise the impact of the development so far as practicable.

With regards to the site specific design of the proposal, it is highlighted at this juncture that the operator has sought to deploy the operational minimum amount of apparatus required in this case, seeking only to remove and replace/relocate the existing 3 no. antennas with 3 no. new antennas , whereas the technically preferred solution would be for additional antennas.

In this regard, it is the applicant's opinion that the telecommunication development would not appear untoward within the context of the Bloomsbury Conservation Area. It is considered that the proposed antennas would be barely noticeable at a casual glance given their discreet siting and size relative to the building. Furthermore, allowing for their height above ground level and angle of perspective together with efforts to camoflague the apparatus, their presence are likely to go unnoticed to the untrained eye. Therefore, the applicant considers that the siting and appearance of the proposed installation would preserve the character and appearance of the Conservation Area.

Indeed, it should be noted that the National Planning Policy Framework (NPPF) directs that when considering the impact of a proposed development on the significance of a heritage asset, great weight should be given to the asset's conservation. The proposed apparatus will provide a rental income to the buildings owner that can be utilised in its upkeep, helping to preserve its long term viability. NPPF also 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 to the public that travel along Holborn and nearby areas. Furthermore, full consideration has been given to the location and design and appearance of the pole mounted antennas together with the character and appearance of Bloomsbury Conservation Area.

To expand upon the siting and appearance of the propsed scheme within the context of Article 2(3) land, the applicants search area is contained entirely within Bloomsbury Conservation Area, which contains some 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 historic environment, especially when taking into account that the operator has compromised their technical requirements and, in this case, the amount of apparatus proposed has been kept to an operational minimum and has been progressed proportionate to the asset's importance. In this regard it should be appreciated that the proposal seeks to provide improved network coverage within a historically sensitive area and has been designed with no more development than is sufficiently needed to fulfil the technical requirements of this site. The location of the three proposed antennas will be 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.

It is also of note that in a recent appeal case (PINs Ref:- APP/X5990/W/19/3238167 – dated 20/01/2020) in which the operators sought planning permission to install new pole mounted antennas within a conservation area, the inspector in allowing the appeal concluded that:- *"Within the Haymarket Conservation Area, information submitted by the appellants indicate that very many of the buildings accommodate utilitarian features at the roof level, including communications equipment, cabinets, air-conditioning plant, window cleaning equipment etc. The appellants have also stated that it is necessary that some of the proposed equipment projects above the screen in order to function. From what I have seen and what has been submitted it seems clear to me that there would be very few opportunities to view the proposed equipment from the ground level, if at all. There may be opportunities to see some of the proposed equipment from higher up within adjacent buildings. This would be from positions where other roof-tops would also be seen and the presence of utilitarian equipment is common. It is also relevant that equipment on St Albans House would be removed and so there is some balance to be considered.*

Having taken account of the limited opportunities to see the proposal, along with the fact that what would be seen would be very small in comparison with the size of the building, I am satisfied that the proposal would have no negative effects on the character and appearance of the Haymarket Conservation Area. In addition, I am also satisfied that there would be no harmful effects on the setting of the Regent Street Conservation Area, for the same reasons."

Whilst each case is to be read upon its own merits, it is considered that there pertinent points to be drawn from this case in that the installation of modern day utilitarian apparatus within a historic environment is not imcompatible and should not be viewed as inappropriate by default.

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 as it has been designed in consideration for the heritage assets that constrain the operator's cell search area. Similarly, it is considered that the 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 designated heritage asset. It is clear that the telecommunications development respects the historic qualities of the site and its surroundings, whereby it would not undermine those specific features as listed that warranted the site's designation.

With regards the need for the development it has been highlighted previously that the operator is required to address coverage shortfall areas 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, the listed buildings, unlisted buildings of merit and the 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. The proposal provides a well balanced approach to telecommunications development and preserving character and appearance of Bloomsbury Conservation Area. It is considered that it complies with both NPPF and local policy.

In light of the case presented above, the applicant considers that the proposal strikes a good balance between environmental impact on the heritage assets 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.

Name: (Agent)	Mark Rogers	Telephone:	
Operator:	Vodafone Limited		
Address:	Mono Consultants Steam Packet House 76 Cross Street Manchester M2 4JG	Email Address:	
Signed:		Date:	12/05/2021
Position:	Acquisiton Surveyor	Company: (on behalf of Cornerstone and above operator)	Mono Consultants