# Town Planning and Heritage Statement

## The installation of a slimline smart pole hosting three small cell antennas in front of no.141 Euston Road, London NW1 2AY

**Cellnex Site Reference UK-5D-038097**

**April 2022**

## 1. INTRODUCTION

1.1 This statement is submitted in support of an application for a prior approval determination to install a 8m high smart pole hosting three small cell antennas and associated electronic communications apparatus at Euston Road in the Bloomsbury area of central London.

1.2 This statement includes:

- A description of the application site
- An explanation of the development proposed and related planning history
- An explanation of how the proposed siting and design of the development accords with National, Regional, and Local Planning and Heritage protection policies
- A summary of the design and access considerations that have informed the proposed layout of the development.

## 2. THE APPICATION SITE

2.1 The application site comprises part of the adopted footpath on the southern side of the A501 Euston Road, in front of the Premier Inn London Euston Hotel (no.141), approximately 60m to the east of its junction with Duke's Road. Euston Road is part of Transport for London's road network and provides a key strategic east-west route connection through inner London. It also an important bus and cycle route and serves as one the main access routes to Euston Railway Station, London St Pancras Railway Station, and London King's Cross Railway Station.

2.2 Land and property fronting both sides of Euston Road in the vicinity of the application site are in a mix of office, commercial, and other uses. On the northern side of Euston Road, opposite the application site, are the Elizabeth Garrett Anderson Gallery, which is included as Grade II in the National Heritage List for England, the Unison Centre, retail premises, and the Grade II Listed The Rocket Public House. Behind these buildings are other commercial premises, along with flats fronting Churchway, Chalton Street, and Doric Way.

2.3 To the immediate south of the application site are the Premier Inn London Euston Hotel and other buildings in a mix of commercial and office uses, which occupy all the frontage between Duke's Road and Mabledon Place. The roof of the Premier Inn London Euston Hotel also hosts

electronic communications base stations operated by the Mobile Network Operators EE Limited and Hutchison 3G UK Limited (the brand 3).

2.4 On the southern side of Euston Road to the west of the application site are the Grade I Listed Church of St Pancras at Upper Woburn Place, Euston Telephone, and premises in office and commercial uses. The roof of Euston Telephone Exchange is also host to electronic communications base stations operated by Telefónica UK Limited (the brand O2) and UK Broadband. Further to the west, on the northern side of Euston Road, are the Grade II* Listed Euston Fire Station, Euston Gardens, which contains several Grade II* and Grade II Listed structures, and Euston Railway Station.

2.4 The boundary of extensive Bloomsbury Conservation Area covers land and property behind the Premier Inn London Hotel and extends along to the northern side of Euston Road to include Euston Fire Station and Euston Gardens. The application site falls outside of the conservation area and is approximately 60m and 40m to the east and north respectively of its closest boundaries.

2.5 Land and property in an around Euston Railway Station is currently undergoing redevelopment and change to accommodate the London terminus of the High Speed 2 (HS2) Railway Line. This area will also see further significant change in the short-medium term due to its designation as part of the Euston Road Opportunity Area in the London Plan and the related policies for the Euston Growth Area in the Camden Local Plan and Euston Road Area Action Plan. Collectively, these policies envisage the delivery of between 2,800-3,800 homes, 180,000-280,000 sqm of new employment floorspace, and new retail development focused on the creation of world class transport interchange at Euston Station.

2.6 This will result in both new physical infrastructure, including new vertical street features, and the need to provide other infrastructure to support the redevelopment. The latter will undoubtedly result in increased demands for mobile network operator and other connectivity needs in a part of London that is already experiencing high demand for these services.

## 3. THE DEVELOPMENT PROPOSED

### *(i) Overview*

3.1 Cellnex operates a concession agreement with the London Borough of Camden Council that permits the installation of small cells on the Council's lamp posts and other street furniture.

This agreement has enabled the Council, Cellnex, and the Mobile Network Operators to work together to provide improved connectivity, in the form of additional coverage and capacity, to local communities in areas of the Borough where there is high demand placed upon mobile connectivity services.

3.2 One such area is Euston Road near to Euston Railway Station where there is significant demand for connectivity services with the associated requirement for the Mobile Network Operators to improve both coverage and capacity for their networks in line with their Ofcom licence obligations. This is a demand that cannot be met through the concession agreement, as a combination of the limited structural capacity of lamp posts and the Council's aspiration for other dual use of its street furniture precludes the installation of more than one small cell on lamp posts in this area. The development proposed seeks to overcome this constraint by installing a smart pole with sufficient structural capacity to host three small cell antennas in order to provide improved connectivity along part of Euston Road for several organisations.

***(ii) The proposed electronic communications apparatus***

3.3 The development proposed, which is shown on the elevation drawing and site plan render submitted with application, involves the installation of the following electronic communications apparatus:

- An 8m high tubular slimline smart pole with a diameter of 168mm
- Three small cell units, which are labelled on the drawings as Nokia B, Nokia C, and the Gateway Box with associated 1m long antenna
- A wrap around equipment cabinet at the base of the pole housing the fibre connection, power, and other apparatus that supports the operation of the small cell units and antenna.

3.4 The respective materials and finishes for the apparatus proposed are as follows:

- The smart pole and wrap around cabinets are made of steel and will be coloured black
- The small cell units are made of aluminium and plastic and will be coloured black
- The 1m long antenna is made of aluminium and will also be painted black.

3.5 The small cells proposed are similar, in terms of size and appearance, to those deployed on lamp posts in numerous locations across the Borough under the concession agreement between the Council and Cellnex. These small items of electronic communications apparatus are outright permitted development, i.e. not subject to the prior approval application process, under Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. In this case, however, the small cells will be hosted on a new pole that is subject to prior approval, hence the application before you.

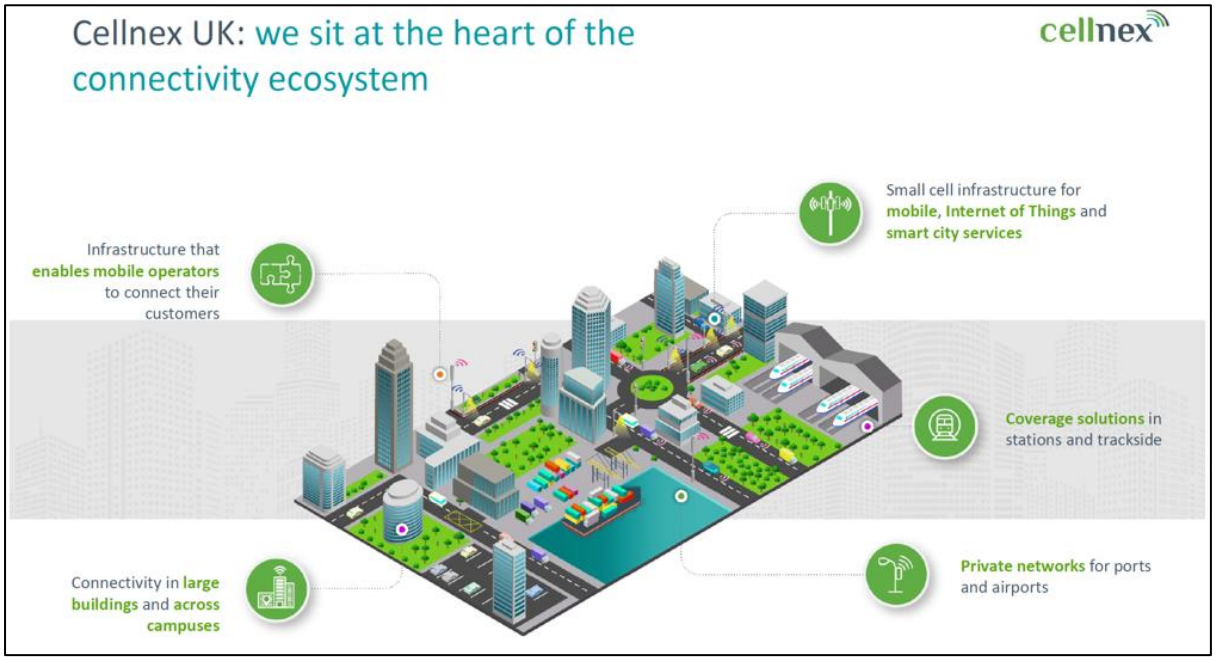
***(iii) Connectivity improvements***

3.6 One of the Nokia small cell units will be used by Virgin Media O2/Telefónica UK to provide additional capacity for O2's fourth-generation (4G) network along Euston Road and on the approaches to Euston Railway Station. The second Nokia small cell unit is reserved for use by another Mobile Network Operator and Cellnex is in active discussions to secure this.

3.7 To help the Council understand the Mobile Network Operators' capacity issues in this area, the submitted coverage plot shows incidences of poor and fair signal levels at Euston Road, in the vicinity of the application site, across all of the UK's four operators over a six-month period. As can be seen O2's network is particularly affected by capacity issues. We also highlight that the Council has consistently opposed the installation of additional antennas on Euston Telephone Exchange, where Telefónica has a base station that provides macro level coverage for O2's network, due to concerns about visual impact at the Euston Road frontage of the building and perceived harm within the Bloomsbury Conservation Area. For example, planning application reference 2016/0874/P, which involved the installation of a base station with associated antennas and equipment cabinets for Vodafone Limited, was withdrawn under threat of refusal in April 2016 due to these concerns. There is, therefore, no potential to install additional apparatus on this building to address the capacity and coverage issues.

3.8 The third small cell unit, which is consists of the gateway box and 1m long antenna, will provide radio coverage for Everynet's Smart Internet of Things (IOT) network. In December 2021, Cellnex and Everynet announced a 10-year partnership to roll out Smart IOT coverage across the UK. This coverage will facilitate numerous public and business benefits, including tracking or monitoring assets throughout their supply chain, Smart Parking solutions to help digitise mobility and optimise the use of public highways and urban space, as well as creating a platform for the trial of new services that will allow the development of innovative future

connectivity applications to deliver the Smart Cities concept. Further information can be obtained by clicking on the link below: https://www.everynet.com/blog/cellnex-uk-and-everynet-roll-out-iot-networks-uk




*(iv) Siting and design factors*

3.9 The proposed siting and design of the development is a response to the following technical, operational, and town planning factors:

- The proposed siting seeks to address the heritage concerns raised in response to a previous application to install the smart pole on the northern side of Euston Road outside the Elizabeth Garrett Anderson Gallery (application reference 2021/6227/P). That application was withdrawn in February this year when the case officer advised that it would be refused due to the impact on the setting of the Grade II Listed Gallery. The revised siting takes account of the advice received, which indicated that a revised position for the smart pole on the southern side of Euston Road may be acceptable provided this was not too close to the junction with Duke's Road, and it would not harm the setting of either the Grade I listed St Pancras Church or the Bloomsbury Conservation Area. For the reasons explained more fully in the heritage section of this statement, we believe that the proposed siting of the development accords with that advice and will not cause harm to the setting of heritage assets nearby

- The revised siting on the southern side of Euston Road will enable Telefónica/Virgin Media O2 and a future Mobile Network Operator to address the current capacity issues illustrated on the submitted coverage plot

- The height and diameter of the smart pole are similar to existing 10m high street lights along this stretch of Euston Road. It will also be sited in line with these streetlights and will, therefore, not appear as an incongruous or alien feature in this densely developed urban townscape

- The power supply and other apparatus that supports the operation of the small cells will be contained in a wraparound cabinet at the base of the pole. This design has been adopted in preference to the installation of a standalone equipment cabinet or equipment pillar to avoid creating additional street 'clutter' within the pavement at Euston Road

- The equipment will be finished in black to match the colour of existing street furniture along Euston Road in order to further mitigate its visual impact

- The proposed siting is also a response the limited amount of space available on the southern side of Euston Road, in front of the Premier Inn hotel, where there is already numerous items of street furniture. This includes street lights, traffic signs, bicycle stands, and air monitoring equipment with cabinets

- It avoids impact on the public realm, pedestrian, and cycleway improvements planned for this part of Euston Road in the Euston Road Area Action Plan. It also avoids reducing the width of the pavement in accordance with the guidance in the Manual for Streets 2 and Transport for London's Streetscape Guidance.

## 4. PRE-APPLICATION ENGAGEMENT

4.1 The National Planning Policy Framework (NPPF) and the Code of Best Practice for Wireless Network Development in England require a consultative approach to network development, including engagement with the planning authority and local community where required, reflecting the sensitivities of any given site. In this case, the proposal received a Green score when assessed against the traffic light rating model where pre-application engagement with

the local planning authority only is recommended (see Appendix B of the Code of Best Practice).

4.2 After careful consideration, we considered that engagement through the Council's formal pre-application consultation service was unnecessary given the advice provided during the determination of application reference 2021/6227/P for the previous smart pole location.

4.3 The assessment undertaken did not identify any sensitive receptors, such as schools, where pre-application engagement is required by the NPPF and the Code of Best Practice. In this respect, the closest educational establishment to the application site is the Maria Fedelis Catholic School FCJ, 1 - 39 Drummond Crescent, London NW1 1LY, which is 310m to the north and, therefore, not 'near' to the site for the purposes of the guidance in the Framework. For the avoidance of doubt, the Blossom Lower School, which was based 105m to the north of the application site at Christopher Place, relocated to new premises at Aldenham Street to the north of Euston Station in Spring 2021. This school is now over 540m from the application site.

## 5. PLANNING POLICY

5.1 The relevant planning policy, material planning considerations, and best practice framework is found principally within:

- The Development Plan, which consists of the London Plan 2021 and the Camden Local Plan 2017
- The Euston Area Action Plan
- National Planning Policy Framework (NPPF)
- The Bloomsbury Conservation Area Appraisal and Management Strategy
- The Code of Best Practice for Wireless Network Development in England.

5.2 From these documents can be discerned the general policy background that exists for the application site, as well as site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development. We highlight, however, that the provisions of Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, (the GPDO) do not require the Council's determination of siting and appearance matters to have regard to the provisions of

the Development Plan for this simple reason that planning permission has already been granted by the Order.

5.3 Nevertheless, the following information is provided to assist the Council to understand how the siting and design of the development, as well as the public benefits of providing improved connectivity, accord with relevant town planning and heritage policies.

**(a) National, Regional, and Local Support for Modern Communications Infrastructure**

(i) Overview

5.4 There is significant UK Government support for improved electronic communication connectivity of all types in view of its increasingly central and transformative socio-economic role. Digital connectivity is vital to enable people to stay connected and for businesses to grow. As the demand for mobile data and other digital connectivity services in the United Kingdom is increasing rapidly, it is important that everyone has access to dependable and consistent wireless coverage where they live, work and travel.

5.5 The *Future Telecoms Infrastructure Review* (FTIR), which was published in 2018, set out a package of measures that the UK Government would adopt to deliver its aspiration for world-class connectivity across the UK. The FTIR recognised the important role that small cells will play in providing improved connectivity, especially within urban areas and near transportation hubs (paragraph 175).

5.6 The National Infrastructure Strategy published in November 2020 also provides further guidance the Government's long-term strategy for meeting its digital connectivity targets and delivering high quality, reliable digital infrastructure that works across the UK. Of relevance to the determination of this application is the following statement on page 31 of the strategy:

*'…The government wants to deliver high quality, reliable digital infrastructure that works across the UK, so that mobile calls do not drop, video calls don't freeze, and people working from home can do their jobs and run their businesses with ease. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. Never has this been more important than as the country deals with the impact of COVID-19, when digital infrastructure has enabled home* working, home learning, and kept families in touch with each other in extraordinary circumstances.'

(ii) Section 10 of the NPPF

5.7 The proposal is supported by Section 10 of the NPPF, which provides further guidance on the Government's objective of providing high quality communications networks in England. The NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services.

5.8 For these reasons, local planning authorities are advised to respond positively to proposals for electronic communications development and this must include an understanding of the technical needs of developing communications networks to deliver Smart IOT coverage, as well as the need to install small cells to supplement existing macro-level coverage for Mobile Network Operators (MNOs).

5.9 You will be aware that paragraphs 115 and 117 of the NPPF, and the Code of Best Practice on Mobile Network Development, encourage the installation of antennas on existing electronic communications sites or, where this is not possible, on tall buildings and other structures. This is not a viable approach for the small cells proposed at Euston Road for the following reasons:

- Telefónica/Virgin Media O2 and the MNOs already have macro-cell base stations installed on buildings fronting Euston Road at Euston Telephone Exchange and the Premier Inn London Euston Hotel. Even with these base stations in place, there are still areas of poor coverage along Euston Road, as demonstrated by the coverage plot provided. This position will not be altered by the installation of additional antennas, including small cell antennas, on these buildings. Consequently, the small cells need to installed at street level to address the coverage and capacity issues in this area

- As explained earlier, structural limitations and the Council's aspirations for the dual use of its street furniture prevent the installation of more than one small cell on lamp posts in the area

- While there are examples of small cell installations on the facades of buildings, this is not a technical solution in this case as the small cells need to provide 360° degree coverage. Consequently, the small cell units need to be installed on the proposed pole

in order to provide the required degree of coverage for Everynet and the additional capacity for the MNOs.

5.10 Given these technical and other constraints, we consider that the siting and design of the development proposed accords with the guidance in the NPPF.

(iii) London Plan 2021 Polices

5.11 The proposal will also help to deliver the objectives of Policy SI 6 Digital Connectivity Infrastructure of the London Plan, which includes in criterion 4 *"support the effective use of rooftops* ***and the public realm*** *(such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure."* (our emphasis)

5.12 This aspiration is explained further in paragraph 9.6.1 of the supporting justification to this policy where the following statement is found:

*"9.6.1 The provision of digital infrastructure is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance. London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. Fast, reliable digital connectivity is essential in today's economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration."*

5.13 Also having regard to the importance of digital connectivity and mobile broadband to the London economy, the Mayor has published two further documents relevant to the application proposal: the draft London Infrastructure Plan 2050; and the report *'Raising London's High Speed Connectivity to World Class Levels'.*

5.14 As part of the work on the 2015 London Plan Alterations, the Mayor commissioned work to develop a long-term infrastructure investment plan for London, and in 2014 the *'London Infrastructure Plan 2050'* was published for consultation. One of the stated aims of the Infrastructure Plan is to enable fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 Digital Connectivity of the Plan indicates how the Mayor's Office will support a mix of technologies including 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.

5.15 These objectives are perhaps most clearly expressed in the Executive Summary of the plan, which provides the following statement:

*"Digital connectivity. Our aim is for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 discusses how we will develop a map of London's connectivity, which will be used for connectivity ratings of individual properties and to identify where networks need to be improved. It sets out how we will support an economically viable mix of technologies including fibre broadband, mobile broadband and future methods of wireless internet delivery. It also discusses how we will work with Ofcom to ensure sufficient radio spectrum is identified 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."*

5.16 The development proposed clearly supports the Mayor's Infrastructure Plan, as the coverage and services provided will allow residents, businesses, and visitors to this part of London to benefit from improved digital connectivity.

5.17 The Mayor's report: *'Raising London's High Speed Connectivity to World Class Levels'* provides the background to, and amplifies, Chapter 16 Digital Connectivity of his Infrastructure Plan. The report notes the availability of internet access not only affects the productivity of businesses and proves essential to the future growth of many firms, but is also vital for many residents to take part in modern society, as more services move online. It also notes among other matters that *'Mobile operators already experience difficulty obtaining permission from local authorities…to increase capacity for their networks in areas where there is high demand'.*

5.18 As with the London Plan and the draft London Infrastructure Plan, the delivery of IOT coverage and improved capacity for O2's network is fully in support of the objectives of Raising London's High Speed Connectivity to World Class Levels.

(iv) The Camden Local Plan

5.19 The development proposed will also support the objectives outlined in paragraph 5.10 of Policy E1: 'Economic Development' the Camden Local Plan. This states that:

*"The Council recognises the importance of digital infrastructure in enterprise development and expects electronic communication networks, including telecommunications and high-speed broadband, to be provided in business premises."*

**(b) Heritage Considerations**

5.20 The proposed siting of the development will result in the installation of a smart pole set amongst street lights of taller height and similar design within the pavement on the southern side of Euston Road in front of the Premier Inn London Euston Hotel. There are numerous Grade I, Grade II*, and Grade II Listed Buildings either side of Euston Road nearby, along with land and property falling within the Bloomsbury Conservation Area to the south and west of the application site.

5.21 The general presumption in favour of allowing development for modern communications, and the special operational and technical factors that require siting of base stations near to conservation areas and in proximity to Listed Buildings, is balanced by the need to conserve or enhance their heritage qualities. This is reflected in the statutory duty imposed on local planning authorities when considering applications for development affecting heritage assets and the related national, regional, and local planning policy heritage protection framework provided by the following:

- Section 16 Conserving and enhancing the historic environment of the NPPF
- Chapter 7 Heritage and Culture of the London Plan
- Policy D2 Heritage of the Camden Local Plan
- The Bloomsbury Conservation Area Appraisal and Management Strategy.

5.22 In relation to this heritage protection policy framework, we highlight that the weight to be given to the special duties imposed by the Planning (Listed Buildings and Conservation Areas) Act 1990 in this case is reduced by the fact that the development benefits from the planning permission granted by Article 3 for the permitted development rights granted by Part 16 of the GPDO.

5.23 We consider that the revised siting on the southern side of Euston Road, nearly equidistant from the junctions with Duke's Road and Cartwright Gardens meets the objective of avoiding

impact on the setting of heritage assets in so far as the technical constrains permit. In this regard the revised siting avoids impact on the setting of the Grade II Listed Elizabeth Anderson Gallery, which was the key concern in relation to application reference 2021/6227/P. The importance of this heritage asset is described in the List entry description in the following terms:

*"Hospital for Women. 1889-90 by J.M. Brydon. Stock brick with red brick dressings in the Queen Anne style, timber cupola, tiled roof. PLAN: rectangular front block parallel with the Euston Road, linked to administrative block along Churchway. Later additions to north and east of lesser interest. EXTERIOR: Frontage block on Euston Road: three storeys and attic. Four-bay front with entrance to left, with projecting porch of red brick, with a moulded arched opening flanked by blocked pilasters. Central chimney stack (truncated), with a cut brick cartouche within a pedimented aedicular surround, reading FOUNDED 1866, at 2nd floor level, alongside a long framed inscription panel. Rusticated quoins of red brick. Segmental-arched windows, originally 6/6-pane sashes (now replaced with UPVC copies), with keystones over centre. Modillion cornice in brick. Mansard roof with a pair of windows within a brick surround abutting the chimney stack; lesser dormers to either side. To right, beyond a recessed link, is a single bay tower of three storeys, the former topped with a weatherboarded superstructure supporting an ogee roof: the ground floor is open, with an altered (formerly arched) opening; the first floor has a segmental-arched window, the second a 6/6-pane sash window within a rusticated, pediment-topped surround, and the third has a round window within a rusticated surround, flanked by pilasters. The west-facing return elevation of the frontage block has a two-storey canted bay to ground and first floors, with a segmental pediment enriched with cut brick decoration at the top. At second floor level is a Venetian window, set within a depressed relieving arch. Three small windows within the gable end. EXTERIOR: former administrative block on Churchway: linked to frontage block with arched, infilled, balconies. Three-bay front with central canted bay to centre. Paired windows to ground floor, tall, 9/9-pane sashes to first floor, 6/6-pane sashes to second. Modillion cornice. Attic storey with tall centrepiece, behind which was formerly a tall ornamental spirelet on an octagonal base. South-facing gable end with truncated chimney stacks, formerly linked with an arch. INTERIOR: much altered. Some memorial plaques over former bed positions remain in situ. HISTORY: this hospital was opened in 1890 as the New Hospital for Women, and was the first purpose-built hospital devoted to women doctors, treating female patients. The foundation stone had been laid by the Princess of Wales in 1889; Brydon exhibited drawings of the building at the 1890 RA.*

*Elizabeth Garrett Anderson (1836-1917), had led the movement for women doctors, and had founded a hospital ward at her dispensary in Marylebone in 1874. The Euston Road hospital combined teaching hospital provision (it initially had 42 beds) with premises for the Women's Medical Institute, situated on the ground floor of the frontage block. The lay-out of the hospital was originally distinguished by a circular ward block at the north end, and by open connecting balconies between the blocks (subsequently in-filled), reflecting the direct involvement of Florence Nightingale and her nephew Sir Douglas Galton. The hospital subsequently expanded considerably, to north and east, in the 1920s, which replaced the circular ward block with a large rectangular block. Only the first generation buildings are included within this listing. Although somewhat altered externally and internally, they possess very considerable historic interest as the country's first proper hospital for women. The frontage block on Euston Road is of particular interest as it is architecturally the most impressive surviving part, and because it originally contained the Women's Medical Institute on the ground floor, with wards on the upper floors."*

5.24 Its importance, therefore, lies in its historical value as the first purpose-built hospital in England where women doctors treated female patients, and in its architectural features along the Euston Road frontage of the building. Today, the setting of this building is characterised by its location on one of London's busiest A roads, which is lined by tall street lights and mature trees, and its position amongst predominantly commercial premises that post-date its construction.

5.25 While the development will introduce a new feature on Euston Road, this will only be intervisible with the Gallery in fleeting views as pedestrians and vehicles pass by. Even then it will then be seen in the context of stall streetlights that line both sides of Euston Road. In our view, the siting on the southern side of Euston Rad, and this context. will ensure that the development will not have any material impact on the sitting of this heritage asset, while leaving unchanged the public's interpretation of the historic role of the site.

5.26 The proposed siting will place the smart pole approximately 75m to the east of the Grade I Listed Church of St Pancras at Upper Woburn Place. The National Heritage List Entry provides the following description of the architectural and history importance of the church:

*"Church. 1819-22. By H and HW Inwood, restored 1951-3. Portland stone with stone coloured terracotta detailing. Single storey, rectangular plan; nave of 6 bays plus vestibule with tower*

*over and portico at west end; east end with apsidal sanctuary and rectangular tribunes to north and south. Greek Revival style, general plan and form influenced by St Martin-in-the-Fields, but rich detailing influenced by, and in some cases copied from, casts of the Erechtheum, Athens. EXTERIOR: west end, hexastyle Ionic portico approached by 2 steps. 3 trapezoid architraved doorways with heavy, panelled wooden doors. All heavily enriched. 4-stage tower over vestibule, a free adaptation of the Tower of the Winds, with octagonal ashlar drum, columns supporting an octagonal entablature, repeated above in diminished scale and surmounted by an octagonal drum with cornice and pointed finial with a cross. North and south facades with trapezoid, architraved, recessed windows, smaller similar windows below, Ionic half columns marking the vestibule and palmette brattishing above the cornice. Projecting near the east end, rectangular tribunes facing north and south; each with Ionic portico supported by 4 caryatids copied from the Erechtheum by John Rossi (formerly a modeller at Coade's Manufactury) built up in terracotta pieces around cast-iron columns; behind the caryatids, a sarcophagus. 2 leaf doors with roundels in the high podium. Apsidal east end with tetrastyle in antis Ionic half columns supporting an entablature and trapezoid, architraved, recessed windows. One similar window each side of the apse, to the nave, and one similar but smaller window to each east facade of the tribunes. INTERIOR: entrance via the west end through an octagonal vestibule corresponding with the tower above and ceiled over a ring of dwarf Doric columns standing in a frieze. Nave has flat, coffered ceiling with galleries supported on lotus columns around 3 sides. Apse with 6 verd-antique scagliola Ionic columns on marble podium in the curve of the apse. Some early memorial tablets in Grecian style. Clerk's vestry in the north tribune with Ionic columns supporting an oval ceiling. Fine mahogany pulpit carried on 4 Ionic columns. High altar, 1914 by Adams & Holden. Stained glass by Clayton and Bell. HISTORICAL NOTE: the earliest Greek Revival church in London, built as part of the southern expansion of St Pancras and superseding the parish church, St Pancras Old Church, Pancras Road (qv)."*

5.27 It's importance is therefore related to its architectural qualities as well as its status as the earliest Greek Revival Church in London. It's importance is also reflected in the Bloomsbury Conservation Area Character Appraisal and Management Plan, where paragraph 5.8 of the document states that: *"…The Greek Revival church of St Pancras (listed grade I) is an important landmark at the junction of Euston Road and Upper Woburn Place. The distinctive tiered tower, the caryatids holding up the portico, and the trees in the churchyard are important elements in views along Euston Road…"*

5.28 The proposed siting of the development has been carefully chosen to ensure that the smart pole will not be intervisible with views of the church and its tower in views from the approaches to Duke's Avenue from the east. To assist the Council with this aspect of the development, the submitted Site Plan Render provides a photomontage of the development from a position to the east of the application site.

5.29 As can be seem, the church building and its tower are set back from Euston Road in this view where the bulk of the Premier Inn London Euston Hotel and the presence of mature trees will block views of this heritage asset. Perspective dictates that views of the church and its tower only widen appreciably when the viewer passes the application site to a position near the entrance to the hotel on the approaches to Duke's Avenue. On the Euston Road approaches to Upper Woburn Place from the west, the presence of mature trees, tall street lights, and built development will also ensure that the smart pole is not intervisible with the church.

5.30 The same position applies in response of the key views and vistas identified in paragraph 3.15 of the Bloomsbury Conservation Area Appraisal and Management Strategy, i.e. the views east and west along Euston Road towards St Pancras Church. There will be no view of the application site from within the Bloomsbury Conservation Area to the south at Bidborurgh Street, Mabledon Place, or Judd Street due to the height of intervening built development fronting Euston Road. Similarly, the smart pole will be viewed against the backdrop of the Premier Inn London Euston Hotel in oblique views from the closest boundaries of the Bloomsbury Conservation Area from the north west at Grafton Place and from the Kings Cross St Pancras Conservation Area to the north east at Midland Road.

5.31 In our view, this siting of the development will ensure that the smart pole will not have any material impact on the setting of heritage assets nearby. Even if some very minor impact is perceived, this will be towards the lower end of 'less than substantial' having regard to the guidance in the NPPF. As you are aware, paragraph 196 the NPPF sets out a balancing exercise where the harm is 'less than substantial'. This strand of national planning policy requires the harm identified to be weighed against the public benefits that flow from the development in terms of the providing improved 4G connectivity, as well as Everynet's Smart IOT coverage for the first time, to the many people living, working, visiting, or travelling through this part of central London.

5.32 In our opinion, the weight is overwhelmingly in favour of permitting the development in the planning balance. The proposal, therefore, accords with the heritage protection policy framework provided in the Development Plan and the NPPF, in so far as this relates to siting and appearance matters.

**(c) Other Policy Considerations**

5.33 Our observations on the design and siting considerations that apply to the development are provided above in relation to the electronic communications and heritage protection policies set out in the Development Plan and the NPPF. For these reasons, we consider it unnecessary to examine in any detail the many considerations that potentially apply to matters of design set out in the NPPF, the London Plan, and the Camden Local Plan.

5.34 In the light of the above, we consider that the careful approach taken to the siting and design of the apparatus demonstrates that all reasonable steps have been taken to minimise visual impact having regard to the technical and operational constraints that apply in this case. The proposal, therefore, accords with the various strands of electronic communications, design, and heritage planning policies set out in the NPPF and the Development Plan.

## 6. ICNIRP COMPLIANCE

6.1 In support of the application, we include a certificate confirming compliance with the relevant ICNIRP guidelines on public exposure. The ICNIRP guidelines seek to protect against the well-known thermal effects of radio emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.

6.2 National planning policy remains clear; provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines through the refusal of planning permission or prior approval.

## 7. SUMMARY AND CONCLUSIONS

7.1 This application relates to the installation of a slimline smart pole within the pavement at Euston Road that will host three small cells and related apparatus. These small cells will remedy some of the current deficiencies in MNOs' network capacity along Euston Road while providing Smart Internet of Things coverage for Everynet's network for the first time.

7.2 As is demonstrated in this Planning and Heritage Statement, any visual impact associated with proposed apparatus should be acceptable in the planning balance and hence the proposed development is in accordance with the NPPF, the Mayor's London Plan, and the Camden Local Plan.

7.3 The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and, therefore, no need to consider health effects and related concerns such as the perception of risk further.

7.4 This statement and the other accompanying material has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in the NPPF. It is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.