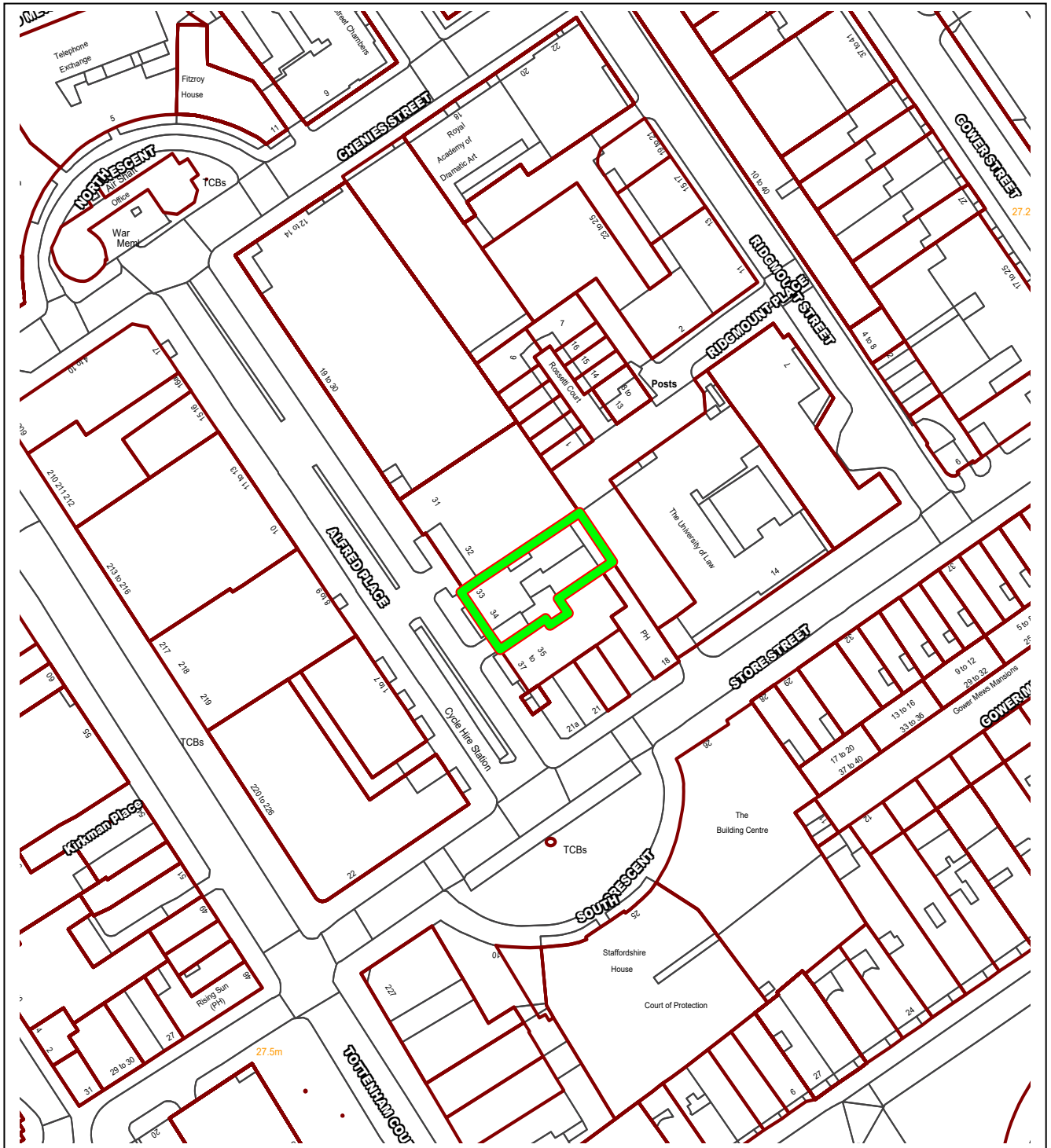


33-34 Alfred Place Site Location



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33-34 Alfred Place Site Photos



1. Front elevation



2. Front elevation and roof



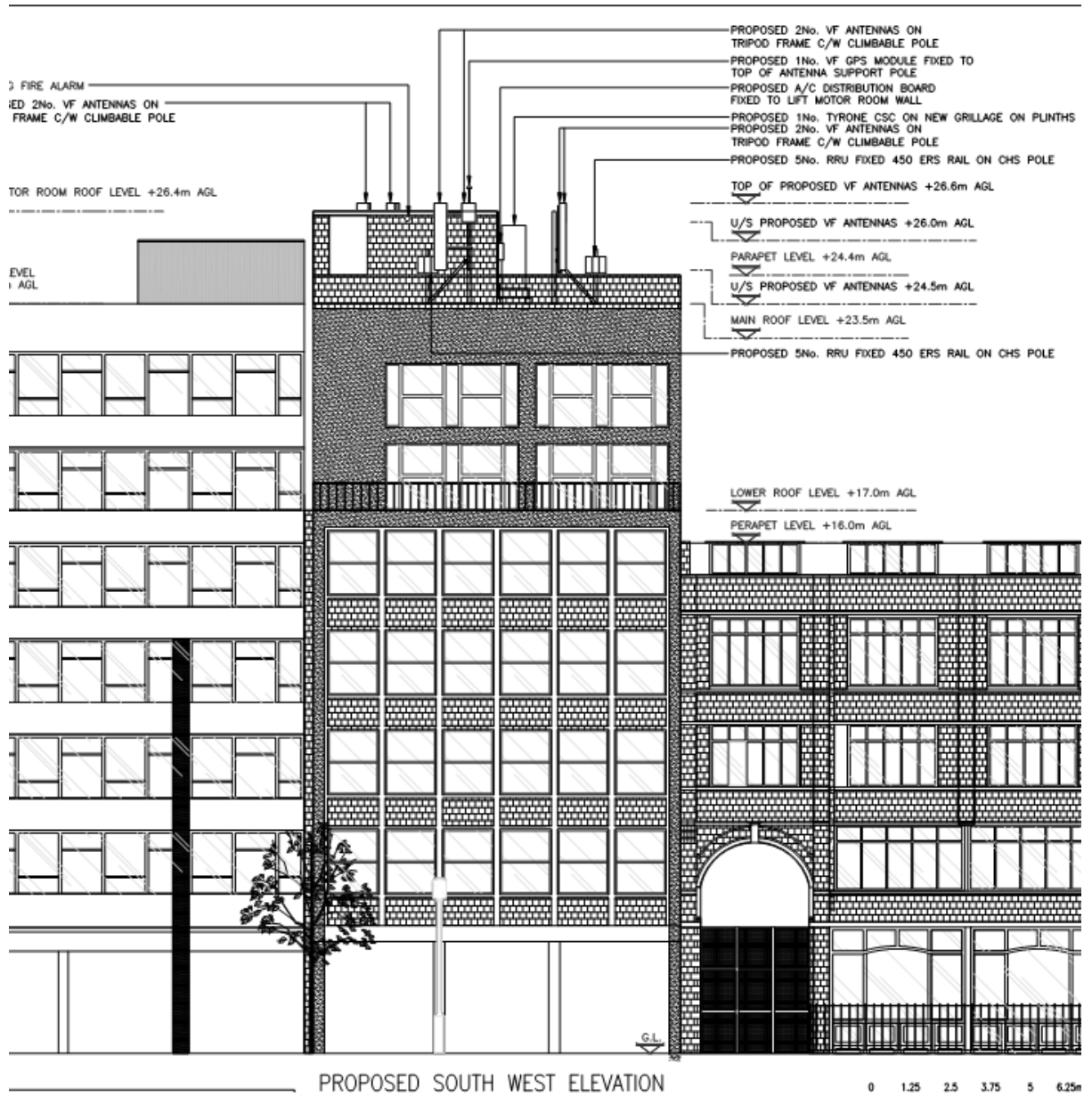
3. Rear elevation



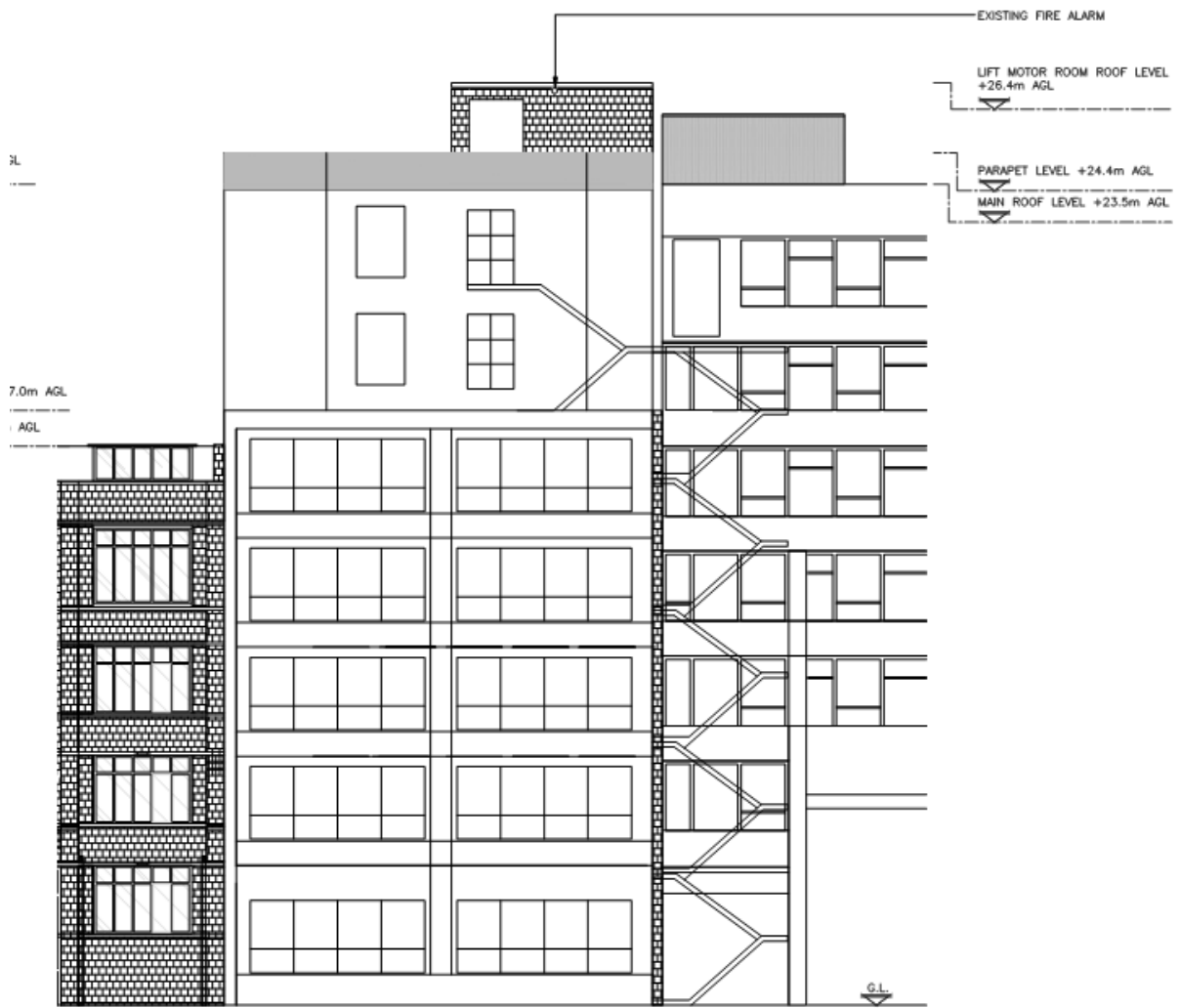
EXISTING SOUTH WEST ELEVATION
(1:125)

0 1.25 2.5 3.75
1:125

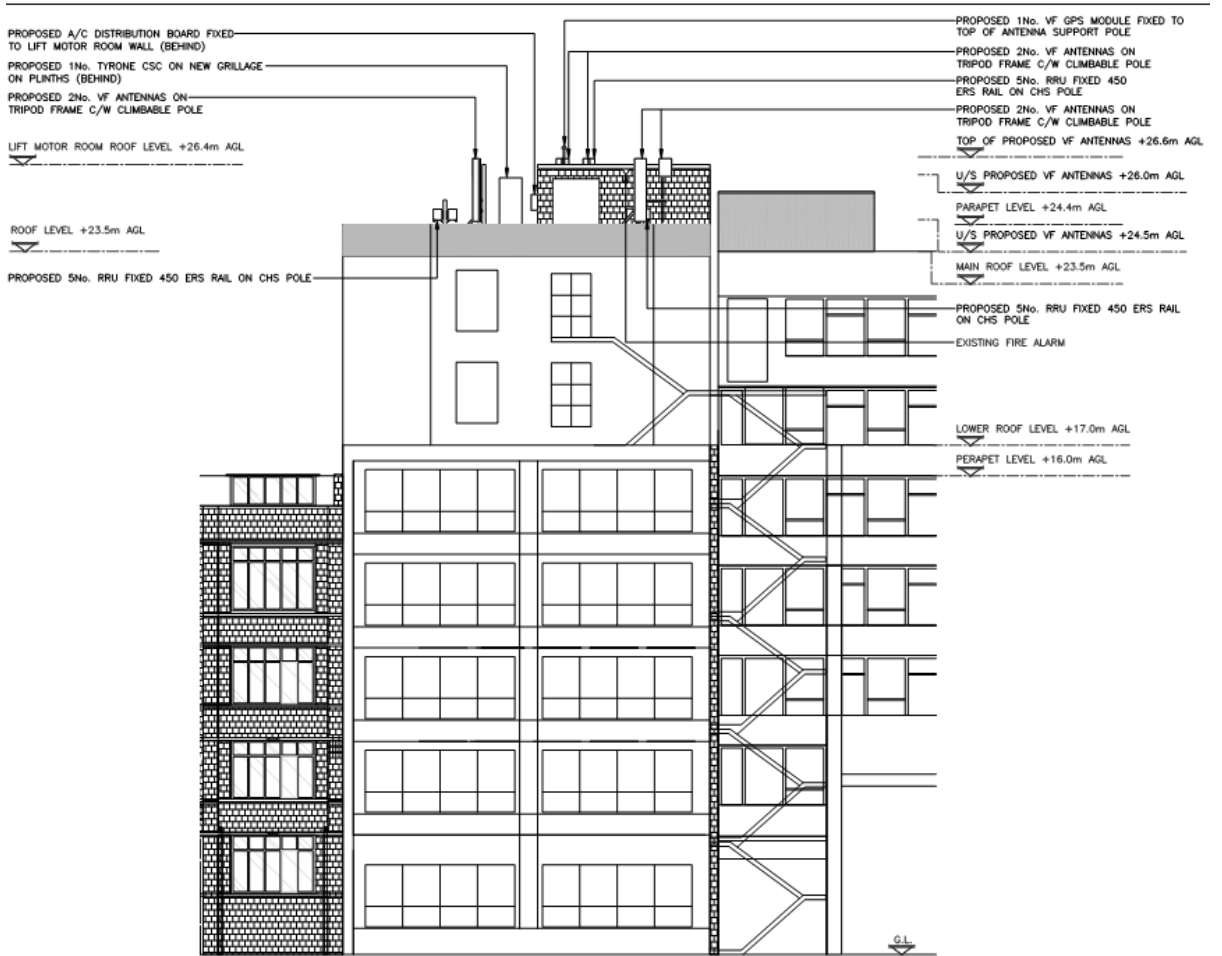
4. Existing front elevation



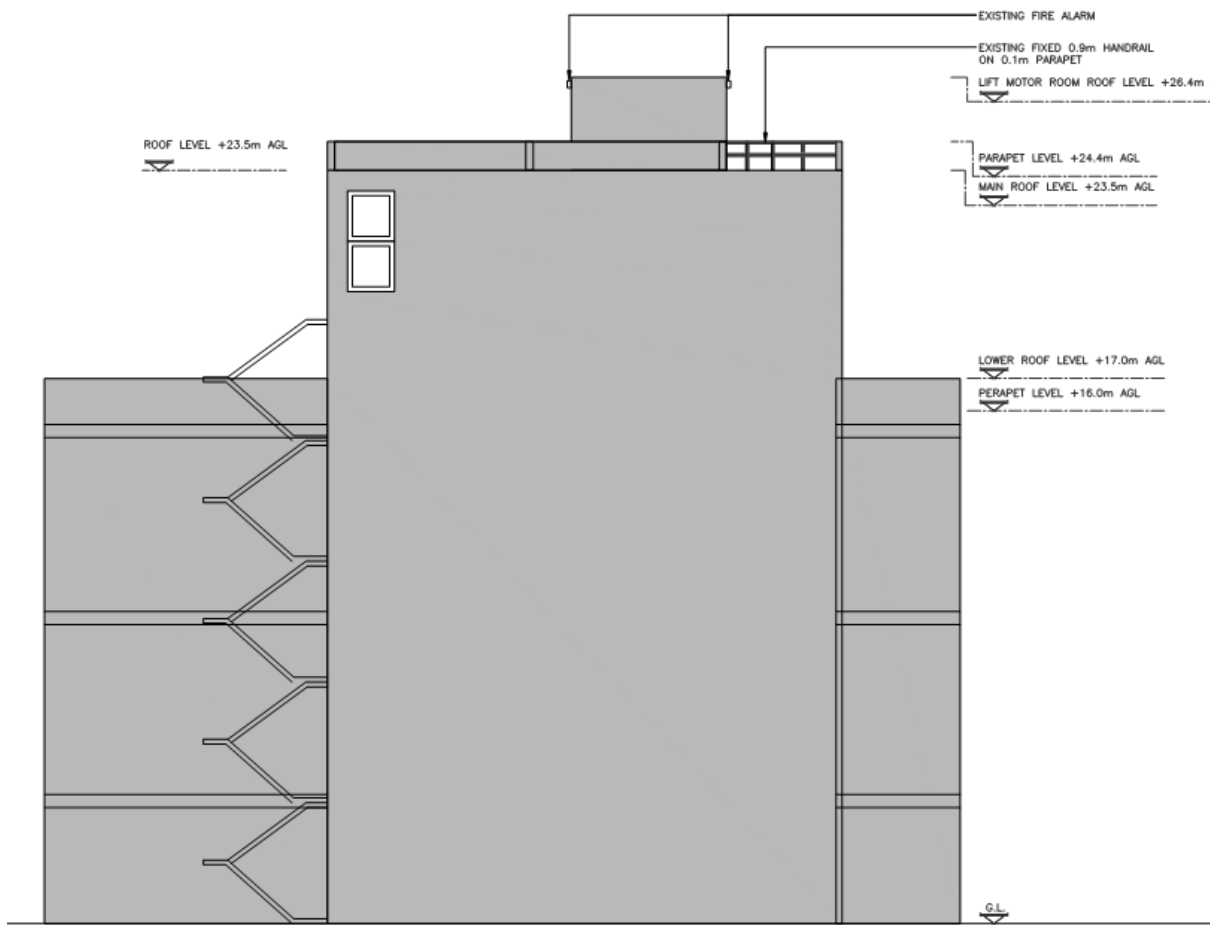
5. Proposed front elevation



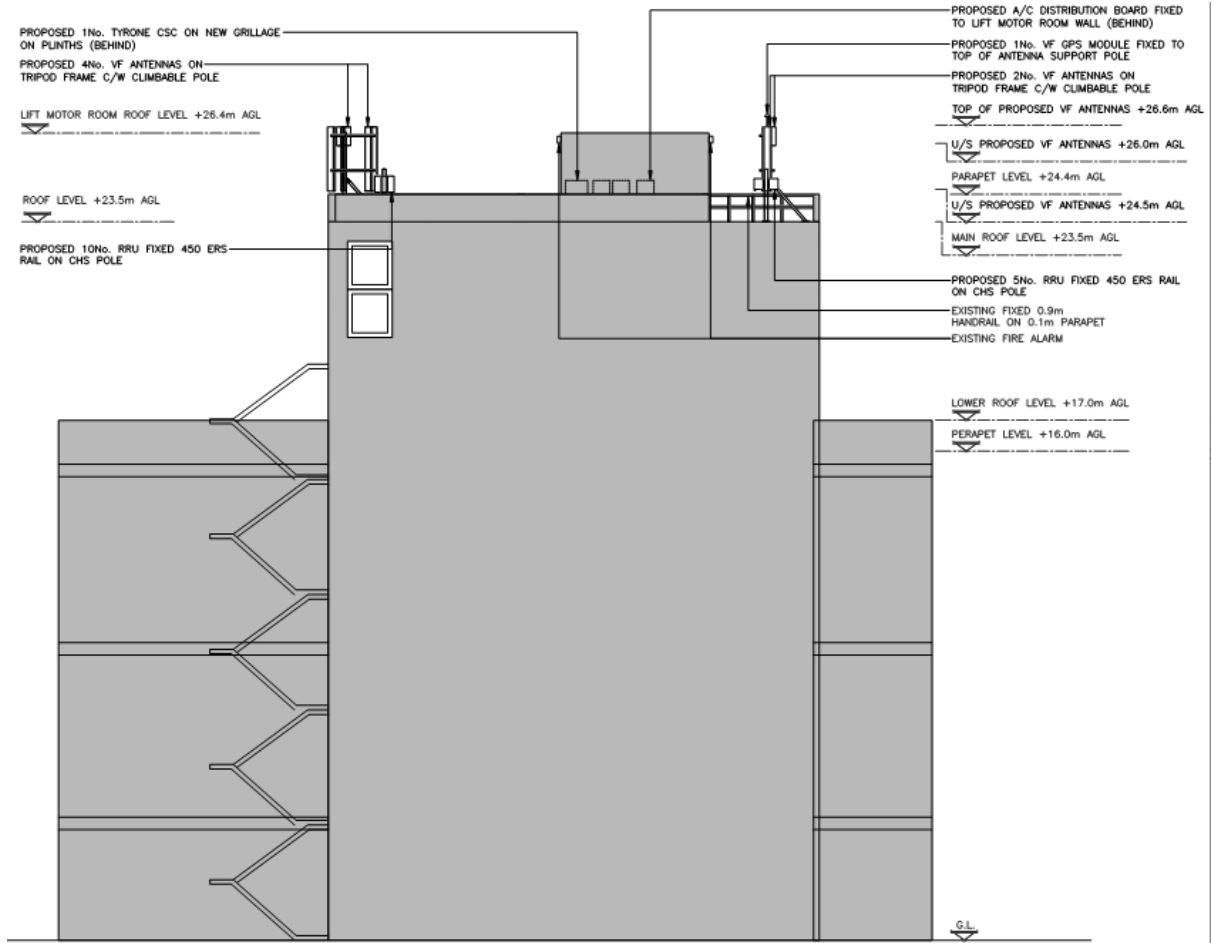
6. Existing rear elevation



7. Proposed rear elevation



8. Existing side elevation



9. Proposed side elevation

Delegated Report		Analysis sheet		Expiry Date:		07/03/2022	
(Members Briefing)		N/A / attached		Consultation Expiry Date:		20/03/2022	
Officer				Application Number(s)			
Edward Hodgson				2022/0083/P			
Application Address				Drawing Numbers			
33-34 Alfred Place London WC1E 7DP				<i>See draft decision notice</i>			
PO 3/4		Area Team Signature		C&UD		Authorised Officer Signature	
Proposal(s)							
The proposed installation of a telecommunications base station at roof level comprising 6 no antennas (height to top 26.6m) on tripod frames, 1no Combined Services cabinet (800 x 660 x 1780mm high) together with ancillary development thereto.							
Recommendation:		Grant conditional planning permission					
Application Type:		Full Planning Permission					

Conditions or Reasons for Refusal:	<i>Refer to Draft Decision Notice</i>			
Informatives:				
Consultations				
Summary of consultation:	<p>A site notice(s) was displayed near to the site on the 23/02/2022 (consultation end date 19/03/2022).</p> <p>The development was also advertised in the local press on the 24/02/2022 (consultation end date 20/03/2022).</p>			
Adjoining Occupiers:	No. of responses	03	No. of objections	03
Summary of consultation responses:	<p>Local residents objected on the grounds of:</p> <ul style="list-style-type: none"> • The equipment would be incongruous and would fail to preserve or enhance the character and appearance of the Conservation Area. • The equipment would have a negative visual impact on the surrounding area. • Health concerns over the exposure to children and residents from 5G transmitters. • The applicant has failed to justify why this site has been chosen. <p><u>Officer's Response:</u></p> <ul style="list-style-type: none"> • The Council, including the Conservation Team, considers that the proposal would bring less than substantial harm to the character and appearance of the Conservation Area and nearby listed buildings. (Please refer to section 3) • The proposal would bring less than substantial harm to the streetscene and townscape. • The applicant has provided supporting information allaying health concerns from 5G. Such concerns are not considered to be a material planning consideration in this instance (please refer to section 4). • The applicant has provided information outlining and justifying the discounted sites within the Supplementary Information. 			
Bloomsbury CAAC:	<p>A letter of objection was received on behalf of the BCAAC. Their objection comments can be summarised as follows:</p> <ul style="list-style-type: none"> • The antennas would be visible from street views and would negative effect on the views and townscape of the Bloomsbury Conservation Area. <p><u>Officer's response:</u></p> <ul style="list-style-type: none"> • The Council considers that the proposals would bring less than substantial harm to the character and appearance of the Conservation Area. (Please refer to section 3) 			

Site Description

The application site is 6-storey office block constructed in the 1960s located on Alfred Place, which has recently been converted into a park. The first four floors have a brick finish with glazed windows and the sixth floor is set back from the principle building line and is finished in white render.

The application site is not listed but is located within the Bloomsbury Conservation Area. It is not listed as a positive or negative contributor.

Relevant History

The planning history for the application site can be summarised as follows:

Application Site:

2017/1689/P- Installation of 6 x air conditioning units in the plant area on the 5th floor. Granted – **07/08/2017**

TP/20545 - The installation of a new shop front at 33/34 Alfred Place. Granted – **09/09/1964**

TP/64136/NW/4407 - The rebuilding after war damage of Nos. 33 and 34 Alfred Place, Holborn. Granted – **19/08/1960**

Neighbouring properties:

31-32 Alfred Place

2015/4464/P - Alterations to existing building, including new shopfronts, roof terraces at 5th and 7th floor levels, ground floor cycle store, creation of lightwell, and rooftop plant, enclosures and ductwork. Granted – **08/01/2016**

2016/0883/P - Alterations to the approved external works, namely new free-standing railings to the rear at first and second floor level; alterations to access ramp at ground floor level; new outward opening door on Alfred Place Frontage; and omission of light well and railings to the Alfred Place frontage as amendment to planning permission reference 2015/4464/P dated 08/01/16 (for alterations to existing building, including new shopfronts, roof terraces at 5th and 7th floor levels, ground floor cycle store, creation of lightwell, and rooftop plant, enclosures and ductwork) Granted – **08/03/2016**

Relevant policies

National Planning Policy Framework (2021)

The London Plan (2021)

Camden Local Plan (2017)

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

Camden Planning Guidance:

- CPG Amenity (2021)
- CPG Design (2021)
- CPG Digital Infrastructure (2018)

Conservation Statements:

- Bloomsbury Conservation Area Appraisal and management strategy (2011)

Assessment

1. The proposal

- 1.1. Planning permission is sought for the installation of 6 no antennas on tripod frames and 1 no combined services cabinet in order to provide enhanced mobile coverage. The equipment would be located at roof level on the sixth floor and would be set back from the principle front elevation of the building. The existing fifth and sixth floors are already set back from the front principle elevation. The antennas would have a height of 1.7m. The roof currently houses a roofbox, railings and air conditioning units.

2. Assessment

The principle considerations material to the determination of this application are as follows:

- Design and Conservation
- Residential Amenity
- Planning balance

3. Design and Conservation

- 3.1. The Council's design policies are aimed at achieving the highest standard of design in all developments. The following considerations contained within policy D1 are relevant to the application: development should respect local context and character; comprise details and materials that are of high quality and complement the local character; and respond to natural features. Policy D2 'Heritage' states that in order to maintain the character of Camden's conservation areas, the Council will not permit development within conservation area that fails to preserve or enhance the character and appearance of that conservation area.
- 3.2. The application site is located within the Bloomsbury Conservation Area but is not listed as making a positive or negative contribution. The site is an office block constructed in the 1960s which has little architectural or design merit.
- 3.3. Camden Planning Guidance 'Design' states that 'good design should respond appropriately to the existing context by ensuring the scale of the proposal overall integrates well with the surrounding area, carefully responding to the scale, massing and height of adjoining buildings, the general pattern of heights in the surrounding area, and positively integrating with and enhancing the character, history, archaeology and nature of existing buildings on the site and other buildings immediately adjacent and in the surrounding area, and any strategic or local views, vistas and landmarks'.
- 3.4. The proposed antennas would protrude above roof level and would be visible from street level and long-range views along Alfred Place and Store Street. The works would be visually intrusive and visible from the public realm. The Council, including the Conservation Team, considers that the proposal would bring less than substantial harm to the character and appearance of the conservation area. The applicant has also stated the proposals would bring less than substantial harm to the conservation area. The antennas would add clutter to the roofscape. The antennas would be set back from the principle front elevation as the existing sixth floor roof is set back. Two of the tripod stands would be located towards to the rear elevation which would make them less visible from the public realm. They would also be obscured by the existing roofbox from views from Alfred Place. The third tripod stand would be located towards the front elevation however this is set back from the principle front building line.
- 3.5. The application site is neither listed as a positive or negative contributor to the conservation area. The site is a 1960s commercial building of little merit and it is therefore considered that the proposals would not bring harm to the character and appearance of the host property.
- 3.6. The applicant has argued that a new telecommunication base is required within the Bloomsbury Conservation Area. A list of discounted sites and their justification has been submitted within the supplementary supporting information. Other sites including 23 Store Street, the Met Building and British Museum were discounted on grounds of a lack of space for equipment, redevelopment of the Met Building which would prevent installation, and harm caused to a listed building in the case of the British Museum. The Council considers that the proposed works cannot be delivered in a less harmful site within the

Bloomsbury Conservation Area.

- 3.7. It is considered that the proposal would cause less than substantial harm to the character and appearance of the conservation area.

4. Residential Amenity

- 4.1. Policy A1 seeks to protect the quality of life of occupiers and neighbours by only granting permission to development that would not harm the amenity of residents. This includes factors such as privacy, outlook, implications to natural light, artificial light spill, odour and fumes as well as impacts caused from the construction phase of development. This is supported by CPG Amenity.
- 4.2. One objection was received on the ground of health concerns. The submitted supporting information states that the balance of evidence to date suggests that exposures to radio frequency radiation below National Radiological Protection Board and International Commission on Non-ionising Radiation Protection Guidelines do not cause a general risk to the health of people living near to the base station. The applicant has submitted information that states that the equipment will meet the ICNIRP guidelines and is therefore acceptable in environmental health terms. Chapter 10 of the NPPF states that local planning authorities must determine applications on planning grounds only and does not give scope for the authority to determine health safeguards beyond compliance with ICNIRP guidelines for public exposure. There is no justification for refusing this application on environmental health grounds.
- 4.3. It is considered that the antennas would not have any adverse impacts on the amenity of residents with regards to privacy, outlook, light, odour or noise.
- 4.4. A condition will be attached to the decision notice requiring details of the construction method prior to the commencement of works. This is because of the recent park created along Alfred Place and to ensure that the construction does not damage or cause disruption to the park and its users.
- 4.5. The proposal is therefore in accordance with policy A1 of the London Borough of Camden Local Plan.

5. Planning Balance

- 5.1. Local Plan policy D1 along with chapter 16 of the NPPF, seeks to preserve and enhance heritage assets, and states that the Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 5.2. The assessment outlined in section 3 of the report states that the proposal would result in less than substantial harm to the character and appearance of the conservation area. The proposed telecommunications equipment is considered a significant public benefit. The supporting information recognises the high level of mobile use in the UK, and 5G systems would serve to provide additional public benefits through greater bandwidth and connectivity. It is argued that local communities can benefit from the new development through greater connectivity which would bring enhanced social interaction and inclusion, improved local economy and services and greater productivity.
- 5.3. It is noted that 5G has more complex requirements and require taller antennas compared to 2G, 3G and 4G, to avoid signals being interrupted.
- 5.4. Weighing the less than substantial harm caused by the development against the demonstrable public benefit, it is considered on balance that the benefit to the public arising from enhancing the local telecommunication coverage and increased capacity outweighs the less than substantial harm caused to the conservation area.
- 5.5. Therefore, on balance the proposed development accords with chapter 16 of the NPPF, which seeks to preserve and enhance heritage assets and the proposal is considered on balance to be acceptable in design terms.

6. Recommendation

6.1 Grant conditional planning permission.

The decision to refer an application to Planning Committee lies with the Director of Regeneration and Planning. Following the Members Briefing panel on Tuesday 19th April 2022, nominated members will advise whether they consider this application should be reported to the Planning Committee. For further information, please go to www.camden.gov.uk and search for 'Members Briefing'.

Application ref: 2022/0083/P
Contact: Edward Hodgson
Tel: 020 7974 8186
Email: Edward.Hodgson@camden.gov.uk
Date: 12 April 2022

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Phone: 020 7974 4444

planning@camden.gov.uk
www.camden.gov.uk

Clarke Telecom
Unit E
Madison Place
Northampton Road
Manchester
M40 5AG

DRAFT

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Full Planning Permission Granted

Address:

Alfred Place
33-34 Alfred Place
London
WC1E 7DP

DECISION

Proposal:

The proposed installation of a telecommunications base station comprising 6 no antennas (height to top 26.6m) on tripod frames, 1no Combined Services cabinet (800 x 660 x 1780mm high) together with ancillary development thereto.

Drawing Nos: Site Location 100, 101, 200, 201, 300, 301, 302, 303, 304, 305, 306, 307, Site Specific Supplementary Information (prepared by Cornerstone dated 22/11/2021), Declaration of ICNIRP, Public Benefit Brochure, Cover Letter (prepared by Cornerstone dated 31/12/2021), Allaying Health Concerns regarding 5G and exposure to radiation (prepared by the Institute of Engineering and Technology), Radio Planning and Propagation v4, Cornerstone Community Information Sheet,

The Council has considered your application and decided to grant permission subject to the following condition(s):

Condition(s) and Reason(s):

- 1 The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans

Site Location 100, 101, 200, 201, 300, 301, 302, 303, 304, 305, 306, 307, Site Specific Supplementary Information (prepared by Cornerstone dated 22/11/2021), Declaration of ICNIRP, Public Benefit Brochure, Cover Letter (prepared by Cornerstone dated 31/12/2021), Allaying Health Concerns regarding 5G and exposure to radiation (prepared by the Institute of Engineering and Technology), Radio Planning and Propagation v4, Cornerstone Community Information Sheet,

Reason:

For the avoidance of doubt and in the interest of proper planning.

- 3 The colour of the proposed antennas and equipment hereby approved shall match as closely as possible the background, or the part of the building to which it is attached. All supporting mounts, poles or structures shall be designed to be as unobtrusive as possible, and should be painted the same colour as the antennas.

Reason: In order to minimize the impact on the appearance of the building and local environment in accordance with the requirements of Policies D1 and D2 of the London Borough of Camden Local Plan 2017.

- 4 The apparatus hereby approved shall be removed from the building as soon as reasonably practicable when no longer required.

Reason: In order to minimize the impact on the appearance of the building and local environment in accordance with the requirements of Policies D1 and D2 of the London Borough of Camden Local Plan 2017.

- 5 Prior to commencement of works a method statement for a precautionary working approach to construction should be submitted to the Local Planning Authority and approved in writing. This shall include details of the duration of the works, the proposed site working hours, the type and size of the vehicles required, a plan indicating where the vehicles would load and unload from, the route of the construction vehicles to and from the site, details on how equipment and materials would be transferred between the vehicles and the site, details on how to ensure the safety of the staff and details on how to keep the public realm clear from obstructions.

Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan 2017

Informative(s):

- 1 Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
- 2 This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.
- 3 All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden.gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)

Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraph 38 of the National Planning Policy Framework 2021.

You can find advice about your rights of appeal at:

<http://www.planningportal.gov.uk/planning/appeals/guidance/guidancecontent>

Yours faithfully

Chief Planning Officer