

## SUPPLEMENTARY INFORMATION

### 1. Site Details

Site Name:	77 Kingsway	Site Address:	77 Kingsway Holborn London WC2B 6SR
National Grid Reference:	E530564 N181335		
Site Ref Number:	CTIL_300360 00 VF_17049 0	Site Type: <sup>1</sup>	Macro

### 2. Pre Application Check List

#### Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	<b><u>Yes</u></b>	No
If no explain why:		
Were industry site databases checked for suitable sites by the operator:	<b><u>Yes</u></b>	No
If no explain why:		

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

Was there pre-application contact:	<b>Yes</b>
Date of pre-application contact:	08/03/2022
Name of contact:	Chief Planning Officer
Summary of outcome/Main issues raised:	
Pre-application correspondence was forwarded to Camden Council by email on 08 March 2022.	
To date no response has been received.	

<sup>1</sup> Macro or Micro

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### Community Consultation

Rating of Site under Traffic Light Model:	<b>Red</b>	Amber	Green
Outline of consultation carried out:			
Pre- application consultation letters were sent by email on 08 March 2022 to Holborn and Covent Garden Ward Councillors – Cllrs Julian Fulbrook, Awale Olad and Sue Vincent and Sir Keir Starmer - MP for Holborn and St Pancras.			
Pre-application consultation letters were also sent by post on 08 March 2022 to the residents of Nos. 73 and 75 Kingsway, London, WC2B.			
Summary of outcome/main issues raised (include copies of relevant correspondence):			
No response has been received to date.			

### School/College

Location of site in relation to school/college (include name of school/college):	
No schools were identified near the application site.	
Outline of consultation carried out with school/college (include evidence of consultation):	
N/A	
Summary of outcome/main issues raised (include copies of main correspondence):	
N/A	

### Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield? No aerodrome safeguarding area has been identified that would impact the proposal.	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response:		
N/A – full planning application		

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## Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	N/A – full planning application	

### 3. Proposed Development

The proposed site:

The application site is a substantial six storey building located on the westside of Kingsway, near the junction with Great Queen Street. The building is in Kingsway Conservation Area; however, it is not listed.



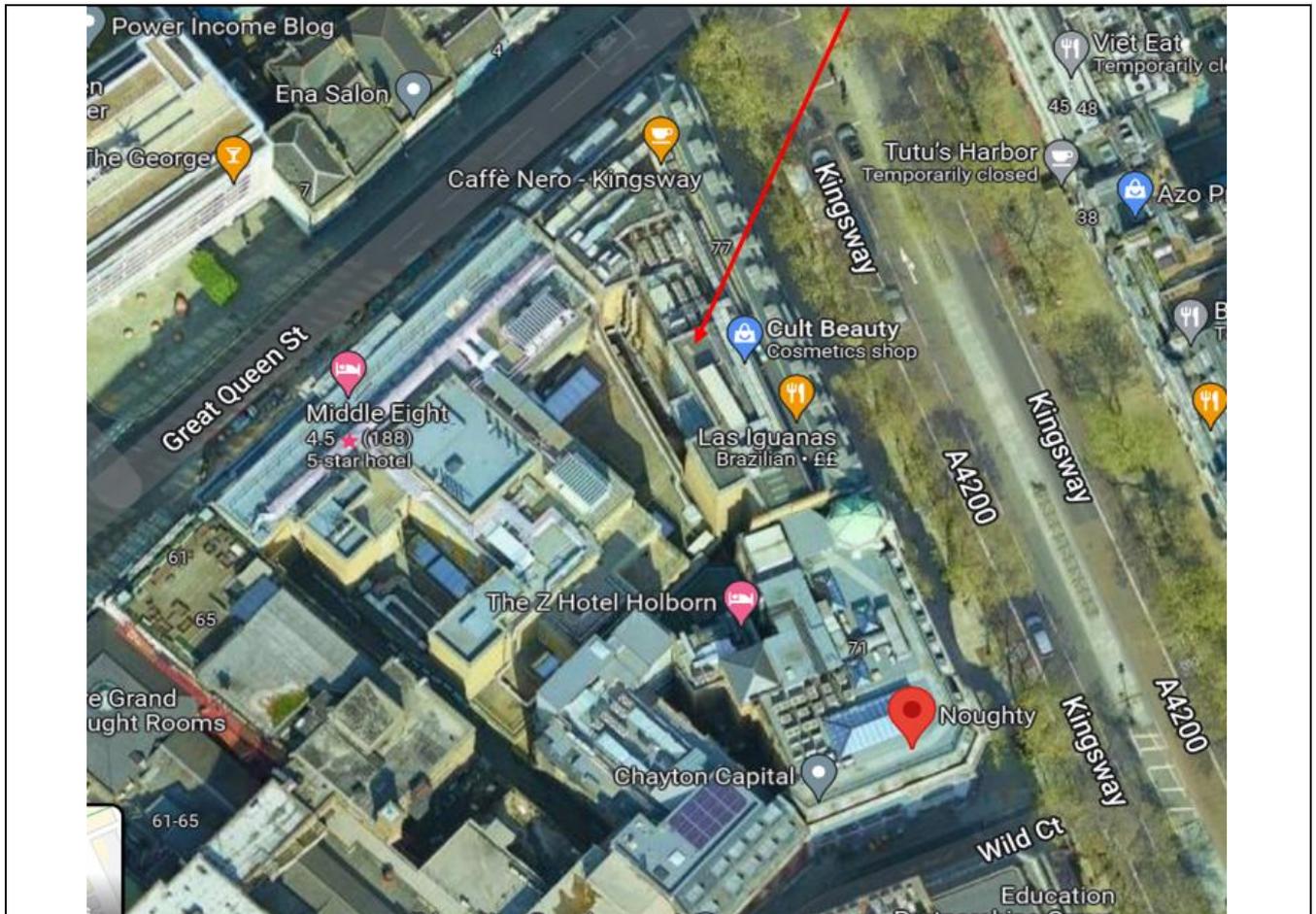
Application site viewed from Kingsway  
Source: Google Maps

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Aerial View: Application Site (red arrow)  
Source: Google Maps

Type of Structure (e.g. tower, mast, etc): Pole mounted antennas and cabinets	
Description:  The proposal would comprise the installation of 3no. antennas, 1 no. 300mm dish, 1 no. 600mm dish, 4no. equipment cabinets and development ancillary thereto on the roof of the building.	
Overall Height (to top of antennas):	35.9 metres
Height of existing building (where applicable):	29 metres (main roof level) 32 metres (top of plant room)

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Equipment Housing x 2:	
Length:	0.620 Metres
Width:	0.620 Metres
Height:	1.770 Metres
Equipment Housing x1:	
Length:	0.800 metres
Width:	0.660metres
Height:	1.770 metres
Equipment Housing x1:	Meter cabinet (smallest cabinet of the four proposed)
<i>Materials (as applicable):</i>	
Tower/mast etc – type of material and external colour:	Steel with a grey finish
Equipment housing – type of material and external colour:	Steel with a grey finish

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

The design of the proposed development has been formulated having regard to the character of the surrounding area and technical requirement of the site. The type of technology to be deployed has dictated the type of equipment and antennas required, which has in turn impacted upon the design. Every effort has been made to minimise the visual impact of the development as far as is practicable for an installation of this nature. The amount and scale of proposed equipment is the least necessary for operational efficiency.

The design has three main elements; the cabinets which contain the equipment used to generate the radio signal, the supporting structures that hold the antennas in the air and fix them to the building, and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements critical to the operation of the base station, include the dishes which would connect the base station to the wider network, the feeder cables that link the equipment housing to the antennas and other support structures such as grillages and fixings often referred to in general terms as “development ancillary to” the base station. Without any of the above components, the base station would not function.

It is also important to note that, for the base station to effectively provide coverage to the desired areas and fit in with the established network pattern, specific antenna orientations and heights, determined by radio planners, must also be achieved. Features of the surrounding area such as existing buildings and trees, referred to as “clutter” must also be cleared in order that they do not block the signals from the

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antennas. It should be noted that 5G antennas are particularly more susceptible to the shadowing effect of surrounding clutter reducing the range of the radio signal and the effectiveness of the antennas. As a result, the siting of 5G antennas is even more critical as in this case to maximise coverage from the site.

Three antennas are proposed to be installed on the building's plant rooms. Two pole mounted antennas and one 600mm dish would be fixed to the wall of the plant room on the north end of the roof. One antenna and one 300mm dish would be installed on the plant room on the southwest end of the roof. Four equipment cabinets are also proposed on the plant room adjacent the antenna on the south end of the roof. The antennas would be positioned at a height that clears surrounding clutter and maximises coverage from the site and ensures ICNIRP compliance too. By positioning the antennas on the plant room as opposed to the main roof, it has been possible to deploy shorter support structures than would otherwise have been required reducing the overall height of the development and minimising its visual effect.

As part of the proposal, two transmission dishes are proposed measuring 300mm and 600mm respectively. The size of the dishes is the minimum necessary for operational efficiency. The dishes would be installed at a height that would enable the installation to connect with other base stations in the wider network without obstruction.

On balance, it is felt that the proposed design is appropriate in the context of the character of the surrounding area and would not have a significant impact on the building and visual amenity.

#### 4. Technical Justification

**Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.**

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

The proposed base station would form part of the Vodafone network. Vodafone currently has a radio base station sited upon the roof of Kingsway House, 103 Kingsway, Holborn, London, WC2B 6QX (subsequently referred to as the 'NTQ' site). The landowner has plans to redevelop the roof and therefore the existing electronic communications apparatus needs to be removed to facilitate redevelopment. This

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has created the need for a replacement site to maintain mobile services to users in this area of Holborn.

The proposed base station at 77 Kingsway would provide coverage in the place of the existing base station at Kingsway House on the Vodafone network.

The new site would maintain and improve connectivity in this area by providing 2G, 3G, 4G and 5G coverage. This will aid ultra-fast mobile connectivity with increased data speeds and faster downloads offering users greater economic and social opportunities.

Ofcom's 2021 Communications Market Report highlights an increase in the use of mobile technology. It states that the volume of data used on mobile connections grew significantly in 2020. The average use per mobile data user was up by 27% to 4.5 GB per month. Given the sustained increase in demand for mobile services year on year, it is crucial for mobile operators to provide and maintain a very high quality and reliable communications infrastructure that provides the necessary coverage and capacity to allow mobile connectivity and meet the ever increasing demand for data as obliged by their Ofcom licence agreements. The proposed development would contribute to meeting this demand.

The government recognises the importance of high quality and reliable communications infrastructure, such as the proposal, as key drivers of economic growth. It considers digital connectivity as an essential service that should be readily accessible to everyone. The importance of mobile connectivity particularly 5G is highlighted in various connectivity reports which support the need for a high quality communications infrastructure network and the expansion of 5G technology.

The Ofcom report "Online Nation 2020" highlights the increasing demand for communications services particularly data services and the important role mobile phones play in accessing the internet. According to the report "71% of all measured time spent online was on smartphones. 35% of internet users only accessed the internet on mobile devices (smartphone or tablet)".

In the government's report "Next Generation Mobile Technologies: A 5G Strategy for the UK" March 2017, the government lays out its strategy to make the UK a global leader in 5G mobile technology by facilitating its deployment to create a world-leading digital economy that works for everyone. It recognises the need for a flexible regulatory framework to facilitate the speed of development.

The government acknowledges that providing the levels of connectivity and coverage required for 5G means having the best possible networks today providing

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high quality coverage able to meet the demand placed upon them and are readily accessible where people live, work and travel.

The significant potential social and economic benefits of 5G are further emphasised in another report by Vodafone UK ‘‘Levelling up’’ June 2020. These benefits could include a revolution in healthcare delivery and outcomes, revitalising retail and improving public sector and business efficiency and remote working, to opening up opportunities for autonomous vehicles. The report also highlights the key role 5G could play in levelling up the country across sectors and geographies and the significant role it can play in economic recovery.

Examples of practical applications of 5G connectivity in everyday life include:

### **Education**

The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

5G’s ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

### **Health**

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G’s ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

The above connectivity reports emphasise the growing demand for mobile technology particularly mobile data and support the need for a high quality communications network which can handle ever larger data requirements. They recognise the importance of telecommunications infrastructure in promoting economic growth. The proposed base station which incorporates 5G technology is precisely the type of high-speed digital infrastructure that the government is seeking

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to support to achieve sustainable economic growth and to meet social needs of users.

## 5. Site Selection Process

Several factors are considered when assessing potential locations for a base station. Because they are relatively low powered devices, base stations can only cover a limited geographical area. The area each base station covers is called a cell. In heavily built-up areas, for example, a small base station might cover a cell area of only a few hundred meters. Each base station can also only handle a limited number of calls at one time (this is referred to as the “capacity” of the cell or network). Each cell overlaps with its neighbouring cells to create a continuous network. The size and shape of each cell is determined by the features of the surrounding area, such as buildings, trees and hills, which can block signals. When people travel between cells, the signal is transferred between base stations without a break in service.

Site placement is always critical in network planning and becomes even more so when seeking to replace another radio site like in this case, due to the unique and specific gap in coverage that must be infilled to ensure the site fits into the established cellular pattern. This places even greater limitations on the potential siting opportunities as many locations will not enable this specific gap to be adequately filled. As mentioned previously, the need for the proposed site has arisen due to the redevelopment plans at Kingsway House, 103 Kingsway, London which would affect the existing base station on the roof. The replacement site therefore needs to be sited as close as possible to Kingsway House to fit into the cellular pattern required to achieve the necessary replacement coverage.

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
RT	Aviation House, 125 Kingsway, Holborn, London, WC2B 6NH	530494, 181471	The rooftop is not structurally suitable to accommodate telecommunications equipment. In addition, the building is Grade II listed and therefore on planning merit is considered less suited for the development relative to the

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			application site which offers the opportunity to address the technical objective without impacting a listed building.
RT	Victoria House, Bloomsbury Square, Holborn, London, WC1B 4DA	530395, 181709	The building is Grade II Listed and due consideration was had to the potential impact of development on the architectural qualities of the building and it's setting. The application site presents an opportunity to meet the coverage requirement without any impact to a listed building and as such holds greater planning merit. In addition, this option is technically inferior to the proposed site due to its location further away from the NTQ site.
RT	15 Richbell, Boswell Street, Holborn, London, WC1N 3PZ	530496, 181832	This option is located too far north of the target area and the NTQ site. A radio base station at this location would not provide the required coverage to the target area.
SW	88 Kingsway, Holborn, London, WC2B 6AA	530530, 181524	A 20m high street furniture pole would be required at this location to achieve optimum coverage in this area. Due consideration was had to the potential impact of such a structure on the setting of this area. It was considered that a ground installation at this location would have a greater impact on visual amenity and heritage assets relative to the proposal at the application site which would be sited on a building with limited visual impact.
RT	10 Great Queen Street, London, WC2B 5DG	530501, 181375	This building is lower than the application site. It would not provide sufficient coverage to the target area.

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SW	Land near 10 Lincoln's Inn Fields, London WC2A 3BP	530704, 181415	Due consideration was had to the potential impact of a 15- 20m mast on the setting of this area. This option is very close to the Grade II listed Lincoln's Inn Fields. It was assessed that a ground installation at this location would have a negative impact on the street scene and setting of this park. This option was discounted in preference of the application site which presents an opportunity to meet the coverage requirement without negatively impacting heritage assets.
RT	Africa House, 70 Kingsway, London WC2B 6AH	530563, 181451	The building is Grade II Listed and due consideration was had to the potential impact of development on the architectural features of the building and it's setting. The application site presents an opportunity to meet the coverage requirement without any impact to a listed building and as such holds greater planning merit. In addition, this option is technically inferior to the proposed site due to its location a considerable distance away from the NTQ site.
RT	65 Kingsway, London, WC2B 6TD	530582, 181277	The building is Grade II Listed and due consideration was had to the potential impact of development on the architectural qualities of the building and it's setting. The application site presents an opportunity to meet the coverage requirement without any impact to a listed building and as such holds greater planning merit.

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

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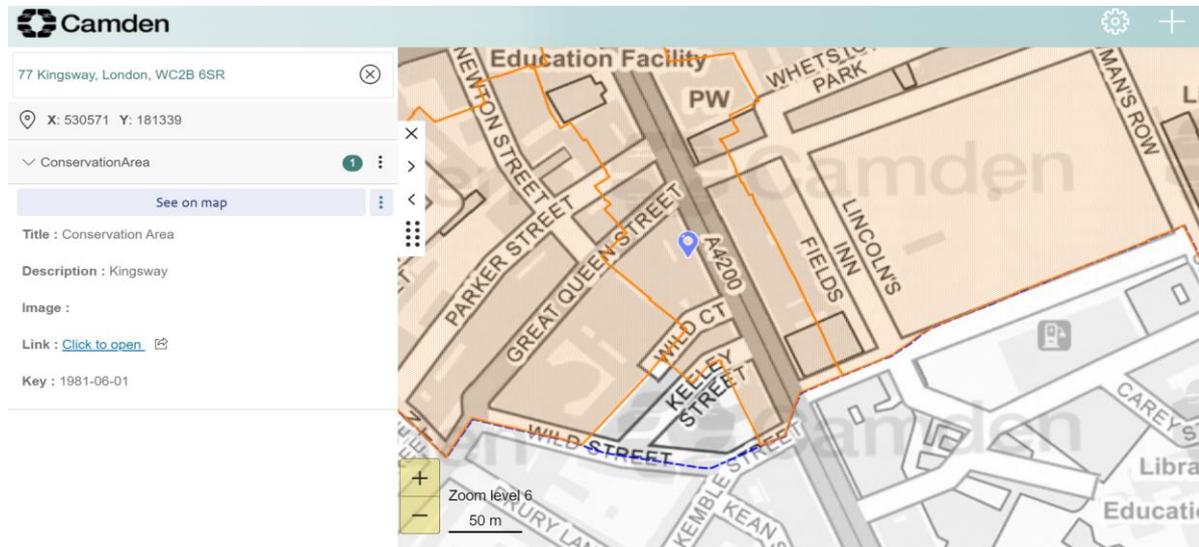
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Land use planning designations:

The application site is in Kingsway Conservation Area as identified on the map below.



Application site (blue marker) in relation to Kingsway Conservation Area (orange boundary)  
Source: Camden interactive maps

The subject building is not statutory listed as shown on the map below. The nearest listed building is Grade II listed 40 and 42 Kingsway, London, WC2B sited on the opposite side of Kingsway located approximately 30 metres away.



Application Site (blue marker) in relation to the nearest listed buildings  
Source: Camden interactive maps

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## Heritage Assessment

### Kingsway Conservation Area Statement

According to the Kingsway Conservation area statement, this part of the conservation area derives its character from the comprehensive scale of early 20th century commercial architecture whose character contrasts strongly with the smaller buildings of Covent Garden to the west and the gardens and legal precinct of Lincoln's Inn Fields to the east. "Individually the buildings provide a range of architectural detail and there is some difference in quality. The whole however is cohesive; a distinct boulevard character was created a century ago and remains largely intact."

"Nos.77-97 Kingsway has been redeveloped with the retention of the original façade designed by Norman and Trehearne. New shopfronts have been installed that are sympathetic in their design to the original building."

Kingsway has several contrasting views which reinforce its character and provide interest and relief. The regularly spaced plane trees, on either side of Kingsway together with the buildings create a boulevard effect and a pleasing homogeneous character.

## **Heritage Planning Policy**

In determining planning applications, the National Planning Policy Framework (July 2021) (NPPF) advises that "local planning authorities should take account of:

- a) *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;...." (para. 197)*

*"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." (para 202)*

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Camden's Local Plan policy relevant to heritage assets is Policy D2. For ease of reference relevant parts of this policy are highlighted below:

### **Policy D2 Heritage**

*The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.*

### **Designated heritage assets**

*"Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss,....."*

*The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.*

*With specific reference to conservation areas Criterion e requires "that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;"*

### **Heritage Impact Assessment**

In evaluating the development proposal, a key consideration is the balance of preserving heritage assets while also enabling the economic growth and social needs of this area of Holborn to be suitably served by quality electronic communication services.

The main issue for consideration is the impact of the proposal on the building and the character and appearance of the conservation area and nearby listed buildings. It should then be assessed whether any resultant impact would be outweighed by the public benefits of the proposal.

The proposal site forms part of a sizeable building on a major road that links Camden Town to south London. The surrounding area is predominately commercial in nature and provides an appropriate setting for the proposed development. The proposed equipment would be installed on two plantrooms on the roof. The apparatus proposed on the north end of the roof would be set back from the building's frontage.

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The equipment on the south end would be positioned at the rear of the building. The setback positions of the proposed apparatus would preserve the character of the building and considerably reduce the visual effect of the proposal. The apparatus is of a small scale relative to the building and would be hardly visible in street views given the height of the building. Street views along Kingsway would be further restricted by existing roadside trees. Where the apparatus is visible particularly at roof level, it would be seen as part of the existing rooftop paraphernalia. Long views of the development would be generally restricted by existing development and trees.

It is assessed that the proposed development would not result in overwhelming harm given the height and scale of the building and screening afforded by existing roadside trees. The building's visual outlook and the character and appearance of the conservation area would be preserved.

As previously noted, the nearest listed building is the Grade II listed 40 and 42 Kingsway, sited on the opposite side of the road. This building is located approximately 30 metres away. As the proposed equipment would be sited away from the building's frontage, it would not be seen in views of this listed building. The setting of the listed building would not be affected as there is sufficient separation distance between it and the application site.

It is also important to highlight that the proposal site offers the opportunity to locate the equipment upon a building that is not listed or one of merit thereby further minimising the impact on heritage assets.

On balance, it is argued that the impact on heritage assets would be less than substantial and would be outweighed by the public benefits of the scheme which would significantly improve connectivity and maintain services in this area. The public benefits of telecommunications infrastructure such as this have been recognised in recent appeal decisions.

For example, in allowing the appeal (reference APP/V5570/W/20/3246770) relating to a rooftop development brought forward by Cornerstone, Telefónica and Vodafone vs the London Borough of Islington, the Inspector noted at paragraphs 20, 21, 26 and 27:

*“20. As set out in the National Planning Policy Framework (February 2019) (the Framework), any less than substantial harm to designated heritage assets should be weighed against the public benefits of the proposal.*

*21. As set out in the Framework, advanced, high quality and reliable communications infrastructure is essential for economic growth and social wellbeing and planning decisions should support the expansion of electronic communications networks,*

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including next generation mobile technology (such as 5G) and full fibre broadband connections. The scheme would support high quality communications and digital connectivity by providing 2G, 3G and 4G connectivity for two different nationwide networks that have a high market share in cumulative terms, as well as the future ability/opportunity to upgrade to 5G services.

26. I am mindful of the statutory duties that require special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas and of preserving or enhancing listed buildings, their settings or any special architectural or historic interest which they possess. I am also conscious that the Framework indicates that, when considering the impact of a proposal upon the significance of designated heritage assets, great weight should be given to the assets' conservation. This is irrespective of whether any identified harm to its significance is at a substantial or less than substantial level.

27. Nevertheless, I am content that the minor level of less than substantial harm that I have identified to multiple designated heritage assets, even when considered in a cumulative sense, would be outweighed by the significant public benefits that would be achieved by the proposal."

Like the above appeal, although circumstances may differ, the perceived harm in this application would be minor and less than substantial. This appeal case reinforces the importance of improved communications connectivity and its benefits which as in this case outweigh the limited harm to heritage assets.

Additional relevant information (include planning policy and material considerations):

## **PLANNING POLICY**

### **National Planning Policy Guidance**

### **National Planning Policy Framework (2021) (NPPF)**

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states "The purpose of the planning system is to contribute to the achievement of sustainable development", and in paragraph 10 that "at the heart of the Framework is a presumption in favour of sustainable development". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

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Registered in England & Wales No. 08087551.  
VAT No. GB142 8555 06



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*“a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*

*c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

The proposed development will maintain and improve communication services in this area resulting in substantial social and economic public benefits as previously highlighted.

The NPPF directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA’s strategic policies must make sufficient provision for:

*“b) infrastructure for transport, **telecommunications** (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)”*

Leading on from this, paragraph 114 states that “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”.

While supported, the number of base stations is encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 115 states that “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”.

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A site is needed to maintain mobile coverage and to improve connectivity in this area of Holborn on the Vodafone network. Although the proposal does not make use of an existing telecommunications mast or site, it would replace the existing radio base station at No. 103 Kingsway. In this regard, it would have a neutral impact on the number of electronic communications sites in this area. The proposed apparatus would also support multiple technologies eliminating the need for additional radio sites in the area. By making use of an existing building, replacing an existing radio site and accommodating multi technologies on one site, the environmental impact would be minimised in line with the above policy objective.

It should be noted that paragraph 118 states that *"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"*.

The development has been designed to be fully compliant with the precautionary ICNIRP guidelines.

The proposed development is fully in accordance with the guidance as set out in the National Planning Policy Framework.

### **Development Plan Policy**

Section 70 of the Town and Country Planning Act 1990 requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The Camden Local Plan 2017 is the key document used in determining planning applications in Camden.

The Local Plan has no policy specific to telecommunications however, in paragraph 5.10 of the Local Plan under "Digital Infrastructure", the council recognises the importance of digital infrastructure and "expects electronic communication networks, including telecommunications and high-speed broadband, to be provided in business premises."

The proposal which would maintain and improve communications services in the area by facilitating faster broadband connections through enhanced 5G services is

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the type of high-quality digital infrastructure the council is seeking to promote in line with the above policy.

The proposed development complies with the relevant local plan policies and no conflict with any other aspect of the plan has been identified.

### **Summary and Conclusion**

The proposal has been designed to keep any impact on the building and surrounding area to an absolute minimum, adopting a simple design with minimum apparatus as the technical constraints will allow. The resultant visual impact would not be significant and therefore the character and appearance of the conservation area and setting of nearby listed buildings would not be harmed as demonstrated in this report.

The proposed development will deliver social, economic, and environmental benefits by maintaining and improving connectivity for users in the area. The proposed radio base station would provide 2G, 3G, 4G and 5G coverage on the Vodafone network.

The lack of viable alternative siting options together with the public benefits of the development outweigh the negligible visual impact associated with the proposal.

The proposal is fully compliant with ICNIRP guidelines and declaration of compliance is provided with the application.

The development complies with the relevant local plan policies and national planning guidance as outlined in this report.

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## Confirmation that submitted drawings have been checked for accuracy

Name: (Agent)	Fiona Kadama	Telephone:	01932 411011
Operator:	Cornerstone		
Company Address:	C/o Agent - Waldon Telecom Rosemount House, Rosemount Avenue, West Byfleet, Surrey, KT14 6LB	Email Address:	fiona.kadama@waldontelecom.com
Signed:		Date:	30 June 2022
Position:	Town Planner	(on behalf of Cornerstone)	Waldon Telecom Ltd

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