

ADDENDUM PLANNING COMMITTEE REPORT

Development Management Service
Planning and Development Division
Environment and Regeneration Department

PLANNING SUB COMMITTEE A	AGENDA ITEM NO:	B5
Date: Thursday, 7 November 2019	NON-EXEMPT	

Application number	P2018/4282/FUL (council own building)
Application type	Full Planning
Ward	Bunhill
Listed building	N/A
Conservation area	N/A
Development Plan Context	Bunhill & Clerkenwell Core Strategy Key Area Central Activities Zone Cycle Routes (Major) Bunhill & Clerkenwell Local Plan Area Article 4 Direction A1 to A2 (Rest of Borough) Article 4 Direction B1(c) to C3 Heathrow Safeguarding Area
Licensing Implications	None
Site Address	Michael Cliffe House Skinner Street London EC1R 0WW
Proposal	The installation of 86 no. small antennas pole mounted on 10 no. free-standing support frames upon the roof of the building, as well as one equipment cabinet and associated alterations.

Case Officer	Alexander McCombie
Applicant	N/A
Agent	Mr Chris Andrews – Waldon Telecom Ltd

1. RECOMMENDATION

The Committee is asked to resolve to **GRANT** planning permission:

1. subject to the conditions set out in **Appendix 1** (Recommendation A);

1. REASON FOR DEFERAL

- 1.1 This application was confirmed for the agenda of Planning Sub-Committee A on 7th November 2019. The application was pulled from the meeting and therefore not heard by members on the night.
- 1.2 The reasons for deferral relate to the advice of planning officers who confirmed that the council had not received comments from the councils housing section in relation to the proposed telecoms before members.
- 1.3 Since the deferral of the item, Officers have received confirmation that the Housing Department are in support of the application. In addition, the applicant has provided further information regarding the type of infrastructure being proposed. The installation of the type of antennas proposed (Siklu and Radwin) is sought in association with extending the fixed broadband wireless network across central London. This type of connection would for example provide a network link between 2 offices which already have fibre broadband without the need for fibre cables to be provided between the 2 buildings. The technology is different to Wi-Fi, with Wi-Fi signals typically designed to cover a wider area to maximise the number of devices that can connect and is substantially different to 4G and 5G technology as fixed broadband wireless relies on point to point connection dependent on a line of site rather than 4G/ 5G signals which can penetrate walls and buildings.
- 1.4 The application had previously been assessed on the basis that it was for the installation of 5G technology. A new report has been prepared on the basis of the updated information provided, confirming that the scheme is for fixed broadband wireless internet and not new 5G technology, and attached at **Appendix 1** below.

Appendix 1

PLANNING COMMITTEE REPORT

Development Management Service
Planning and Development Division
Environment and Regeneration Department

PLANNING SUB COMMITTEE A		AGENDA ITEM NO:	
Date:	Tuesday 17 th March 2020	NON-EXEMPT	

Application number	P2018/4282/FUL (council own building)
Application type	Full Planning
Ward	Bunhill
Listed building	N/A
Conservation area	N/A
Development Plan Context	Bunhill & Clerkenwell Core Strategy Key Area Central Activities Zone Cycle Routes (Major) Bunhill & Clerkenwell Local Plan Area Article 4 Direction A1 to A2 (Rest of Borough) Article 4 Direction B1(c) to C3 Heathrow Safeguarding Area
Licensing Implications	None
Site Address	Michael Cliffe House Skinner Street London EC1R 0WW
Proposal	The installation of 86 no. small antennas pole mounted on 10 no. free-standing support frames upon the roof of the building, as well as one equipment cabinet.

Case Officer	Alexander McCombie
Applicant	N/A
Agent	Mr Chris Andrews – Waldon Telecom Ltd

1. RECOMMENDATION

The Committee is asked to resolve to **GRANT** planning permission subject to:

1.1 The conditions set out in **Appendix 1** (Recommendation A);

2. SITE PLAN (site outlined in red)

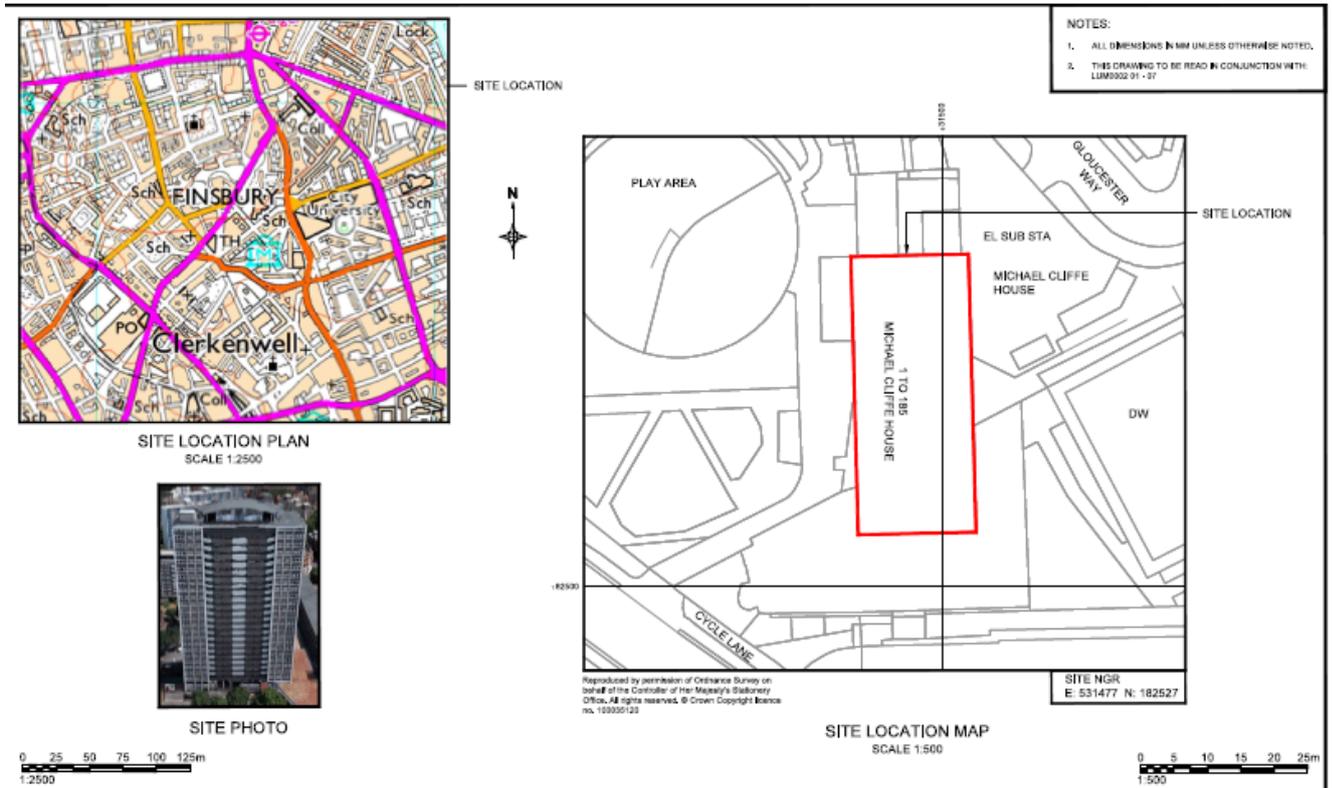


Image 1: Site location Plan (outlined in red)

3. PHOTOS OF SITE/STREET



Image 2: Aerial view of site (from the south)



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Image 3: Aerial view of site (from the north)



EXISTING VIEW A



PROPOSED VIEW A

Image 4: View from junction of Tysoe Street and Roseberry Avenue to the west of the site (Roseberry Avenue Conservation area)



EXISTING VIEW B



PROPOSED VIEW B

Image 5: View of proposals from Junction of St John, Percival and Skinner Street to the east of the site (Clerkenwell Green Conservation Area).



EXISTING VIEW C



PROPOSED VIEW C

Image 6: View of proposals from St John Street to the north of the site.

SUMMARY

- 3.1 The application proposes the installation of 86 x small antennas pole mounted on 10 x free standing support frames upon the roof of the building, the installation of 2 x equipment cabinets within the existing plant room and associated works. The installation of the type of antennas proposed (Siklu and Radwin) is sought in association with extending the fixed broadband wireless network across central London.
- 3.2 This type of connection would for example provide a network link between 2 offices which already have fibre broadband without the need for fibre cables to be provided between the 2 buildings. The technology is different to Wi-Fi, with Wi-Fi signals typically designed to cover a wider area to maximise the number of devices that can connect and is substantially different to 4G and 5G technology as fixed broadband wireless relies on point to point connection dependent on a line of site rather than 4G/5G signals which can penetrate walls and buildings.
- 3.3 The proposed antennas would sit inside an existing 1.1-metre-high handrail inset from the edge of the roof upon which existing telecommunications antenna is already fixed. The antennas are necessitated to be positioned close to the edge of the roof on all side of the building in order to ensure sufficient signal and point to point connections.
- 3.4 Matters of design and scale have been considered during the course of the application. In this instance it is considered that the siting of the proposed equipment, when considered against the high level location of the proposals, are placed appropriately to reduce its prominence from the public realm. This is on the basis that the height of the building ensures that views are heavily obscured from nearby views, and that the equipment is not large enough to be noticeably visible from longer views. It is acknowledged these would be visible from some longer views from the surrounding conservation areas, however the positioning, relative small scale of the dishes and high level position of the antennas would not lead to harm to the surrounding conservation areas.
- 3.5 The proposals are thus considered to be acceptable in visual amenity terms, would in light of their limited scale have no impact on the amenities of neighbouring properties according with the Council's Development Plan.
- 3.6 In regard to health and safety relating to any potential impact of the proposed equipment on human health. A signed ICNIRP Declaration from the manufacturer (Siklu Communication Ltd) has been submitted with the application confirming that the proposed antennas would not generate Electromagnetic radiation above thresholds that would pose a risk to the general public or workers responsible for maintaining the equipment.
- 3.7 Additionally, comments have been received from the Islington and Council Public Health with the comments suggesting that there is extensive research that concludes that point to point wireless broadband and its associated infrastructure does not cause a threat to human health
- 3.8 Further, the proposals would provide a significant public benefit in improving wireless internet according with the intentions of Paragraph 7 of the NPPF to ensure the purpose of the planning system to contribute to the achievement of sustainable development and the presumption in favour of sustainable development in paragraph 10 of the NPPF. More specifically, the proposals would also support paragraph 112 of

the Framework which 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 and full fibre broadband connections*’.

3.9 For the reasons above the recommendation to committee is to resolve to grant planning permission subject to planning conditions.

4. SITE AND SURROUNDING

4.1 The application site refers to the roof of a 24 storey residential building situated on the northern side of Skinner Street in the Bunhill and Clerkenwell area of the borough. Council tax records show that the building is separated into 136 self-contained flats.

4.2 The site is not situated within a conservation area, nor does it contain any statutory listed or locally listed buildings. The site is located in proximity to a number of conservation areas including the New River CA to the north, the Northampton Square CA to the east, the Clerkenwell Green CA to the south and Roseberry Avenue CA to the west. The location of the conservation areas in relation to the application site is shown below:

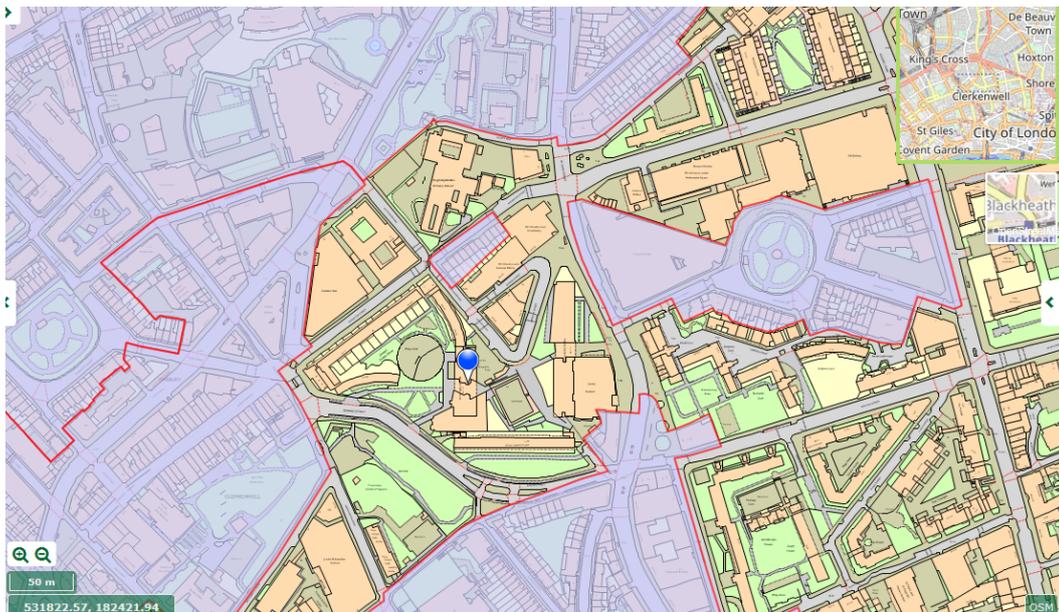


Image 7: Nearby Conservation Area Boundaries

4.3 The immediate surrounding area is predominantly characterised by multi-unit housing. However, the broader area is comprised of a range of commercial and mixed uses. The site is designated within the Central Activities Zone and the Bunhill and Clerkenwell Core Strategy Key Area.

5. PROPOSAL (IN DETAIL)

5.1 The proposals include the installation of 86 small antennas pole mounted on 10 free-standing support frames upon the roof of the building, the installation of 2 x equipment cabinets at roof level and associated works.

6. RELEVANT HISTORY:

- 6.1 **P2017/4482/FUL** - Installation of eight poles, each supporting four antennas on the rooftop plus associated equipment. **Approved 9th January 2019.**
- 6.2 **P062129** - Re-siting of existing equipment cabinet at roof top level and provision of a second cabinet. **Approved 21st July 2007**

7. CONSULTATION

Public Consultation

- 7.1 Letters were sent to occupants of 316 addresses including residents at Michael Cliffe House and adjoining and nearby properties at Skinner Street, Myddelton Street and Gloucester Way initially on 20 February 2019, with an associated site notice displayed on 28 February 2019.
- 7.2 However, given the time since this initial consultation and the receipt of further documents, following the deferral of the application from 7th November 2019 committee. A further round of consultation has been undertaken with letters sent out on 15 January 2020 to the 316 addresses and an accompanying site and press displayed on 23 January 2020. The latest round of public consultation on the application therefore expired on 16 February 2020, however it is the Council's practice to continue to consider representations made up until the date of a decision.
- 7.3 At the time of the writing of this report a total of **197 objections** (primarily from residents within Michael Cliffe House and the Tenants Resident Association) have been received from the public by way of a petition in relation to the application. The issues raised can be summarised as follows.
- 7.4 Grounds of objection can be summarised as:
1. Concern that the installation of the 86 antennas will bring increased activity to the roof with operatives on the roof for 2 to 3 hour sessions once or twice a week to maintain the antennas causing disruption to the households on the top floor of the block
 2. Concern that the fabric of the roof at Michael Cliffe House is not designed to withstand constant pedestrian access and that the activity of maintenance operatives will cause damage to the roof.
 3. Concern that the increase in access to the roof will compromise security to the building with a history of the roof as a suicide location.

Officer Response- *With regard to points 1-3 it is noted that the roof already hosts equipment including a radio base station for another operator and a weather station. Whilst it is acknowledged that the proposed installation of 86 antennas would require maintenance, it is not considered that their maintenance would be dissimilar to the existing maintenance arrangement and requirement for the existing equipment. Officers thus do not consider that the resulting movements to and from the roof to maintain the equipment would cause noise nuisance, would damage the roof or would lead to a compromise in security allowing further persons on to the roof.*

4. Concern that the radiation from 86 antennas will endanger the health of residents (**See Health Risks section of the report, Paragraphs 9.27- 9.35**).

Officer Response- *The issue of any potential public health impact of the proposed antennas on residents is taken very seriously by the Council. During the consideration of the application a response has been received from Camden and Islington Public Health departments confirming that extensive research on the health impacts of antennas has been undertaken and demonstrates that these structures have no detrimental impact on public health. Notwithstanding this the proposed antennas are also required to meet the International Commission on Non- Ionizing Radiation Protection standards regarding the level of non-ionizing radiation they are able to emit. A statement has been submitted with the application to confirm that the proposed antennas meet this standard.*

5. That Michael Cliffe House is a notable example of brutalist architecture. Concern that the proposed equipment will have a detrimental impact to the visual amenities of the building and the setting of the surrounding conservation areas

Officer Response- (**See visual amenity section of the report, paragraphs 9.2-9.7**)

6. Concern that alternative sites have not been fully considered. It is stated that there a number of high office buildings in the vicinity that could serve the same purpose or that trenching of wired fibre broadband cable could be undertaken instead.

Officer Response- *Alternative sites- The Planning Statement submitted with the application states that Michael Cliffe House is one of a limited number of sufficiently tall buildings in the intended area that can meet both the technical requirements and maintain operational security. As the building already accommodates communications equipment it is considered an unreasonable location for the proposed equipment. Planning must consider the individual planning merits of each individual case and in this instance the proposed location is considered an appropriate location for the proposed equipment.*

Internal Consultees

- 7.5 Public Health – Response received jointly from Islington and Camden Public Health Officers stating that research has been undertaken on the impacts of wireless antennas, radio base stations and electromotive force on human health and that the evidence demonstrates that there are no ill effects on human health. All antenna and equipment used in the transmission of mobile phone signals, television and radio transmission and wireless broadband are required to adhere to strictly standards on non-ionising radiation set out by the (International Commission on Non- Ionizing Radiation Protection).

8. RELEVANT STATUTORY DUTIES & DEVELOPMENT PLAN CONSIDERATION & POLICIES

8.1 Islington Council (Planning Sub-Committee A), in determining the planning application has the following main statutory duties to perform:

- To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations (Section 70 Town & Country Planning Act 1990);
- To determine the application in accordance with the development plan unless other material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004) (Note: that the relevant Development Plan is the London Plan and Islington's Local Plan, including adopted Supplementary Planning Guidance.)

8.2 National Planning Policy Framework 2019 (NPPF): Paragraph 10 states: "at the heart of the NPPF is a presumption in favour of sustainable development.

8.3 The National Planning Policy Framework 2019 seeks to secure positive growth in a way that effectively balances economic, environmental and social progress for this and future generations. The NPPF is a material consideration and has been taken into account as part of the assessment of these proposals.

8.4 In considering the planning application account has to be taken of the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.

8.5 The Human Rights Act 1998 incorporates the key articles of the European Convention on Human Rights into domestic law. These include:

- Article 1 of the First Protocol: Protection of property. Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.
- Article 14: Prohibition of discrimination. The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status.

8.6 Members of the Planning Sub-Committee must be aware of the rights contained in the Convention (particularly those set out above) when making any Planning decisions. However, most Convention rights are not absolute and set out circumstances when an interference with a person's rights is permitted. Any interference with any of the rights contained in the Convention must be sanctioned by law and be aimed at pursuing a legitimate aim and must go no further than is necessary and be proportionate.

- 8.7 The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics, namely: age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs and sex and sexual orientation. It places the Council under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. The Committee must be mindful of this duty inter alia when determining all planning applications. In particular, the Committee must pay due regard to the need to: (1) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; (2) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and (3) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 8.8 In line with Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in assessing the proposals hereby under consideration, special regard has been given to the desirability of preserving the Conservation Area, its setting and any of its features of special architectural or historic interest.
- 8.9 The National Planning Policy Framework 2019 seeks to secure positive growth in a way that effectively balances economic, environmental and social progress for this and future generations. The NPPF is a material consideration and has been taken into account as part of the assessment of these proposals.

Telecommunications

- 8.10 Chapter 10 of the NPPF is entitled Supporting high Quality communications. It is stated at Paragraph 112 that, '*Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).*'
- 8.11 Paragraph 113 further clarifies 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. Where new sites are required equipment should be sympathetically designed and camouflaged where appropriate.*'
- 8.12 Paragraph 114 establishes that '*Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that: a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.*'

- 8.13 Paragraph 115 states that *'Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include: a) the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and b) for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or c) for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure 34 and a statement that self-certifies that, when operational, International Commission guidelines will be met.'*
- 8.14 In addition, Paragraph 116 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.'*

Development Plan

- 8.15 The Development Plan is comprised of the London Plan 2016, Islington Core Strategy 2011, Development Management Policies 2013 and Site Allocations 2013. The policies of the Development Plan are considered relevant to this application and are listed at Appendix 2 to this report.
- 8.16 Some weight is attributable to the Draft London Plan

Supplementary Planning Guidance (SPG) / Document (SPD)

- 8.17 The SPGs and/or SPDs which are considered relevant are listed in Appendix 2.

9. ASSESSMENT

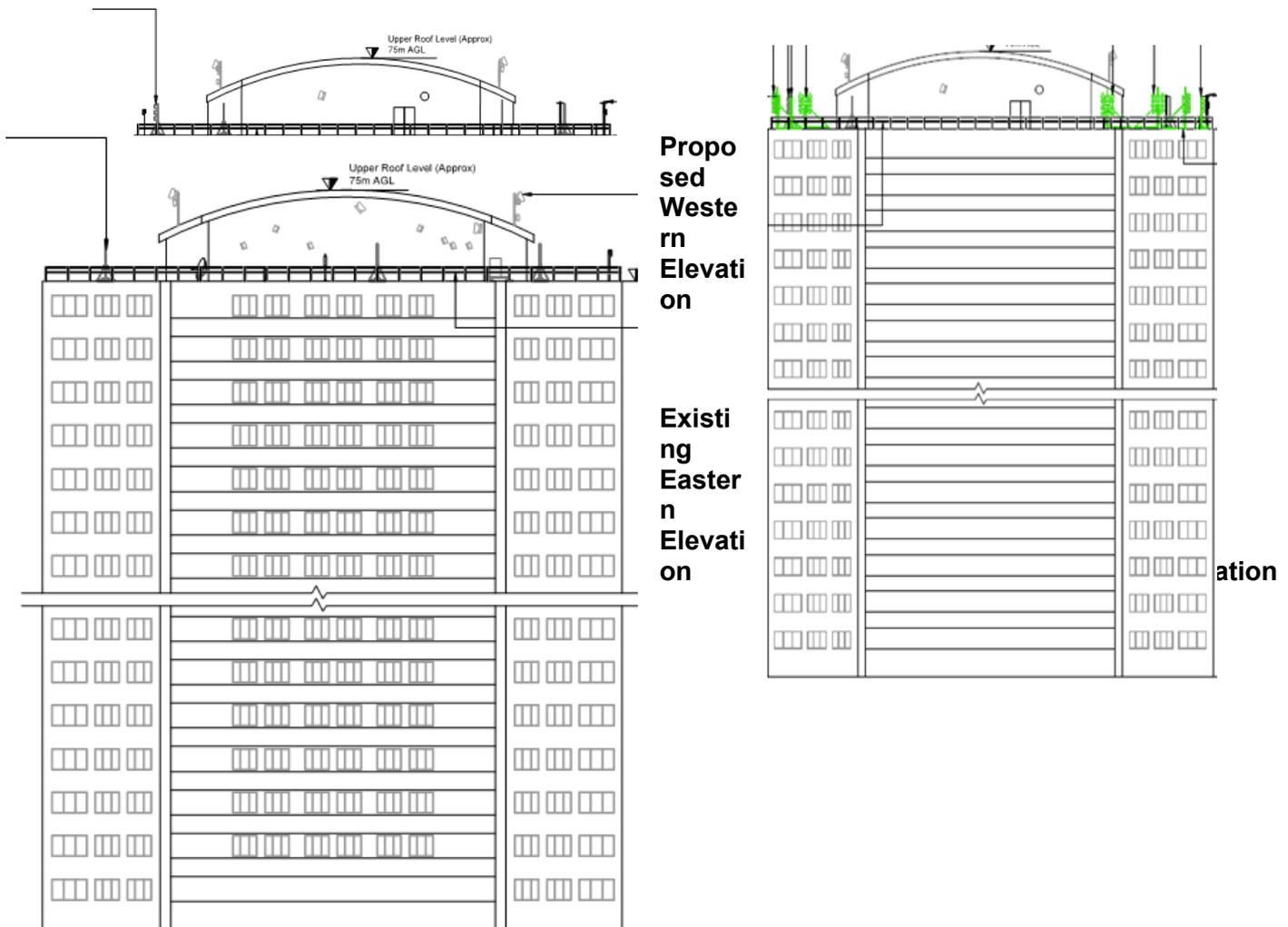
- 9.1 The main issues arising from this proposal relate to:

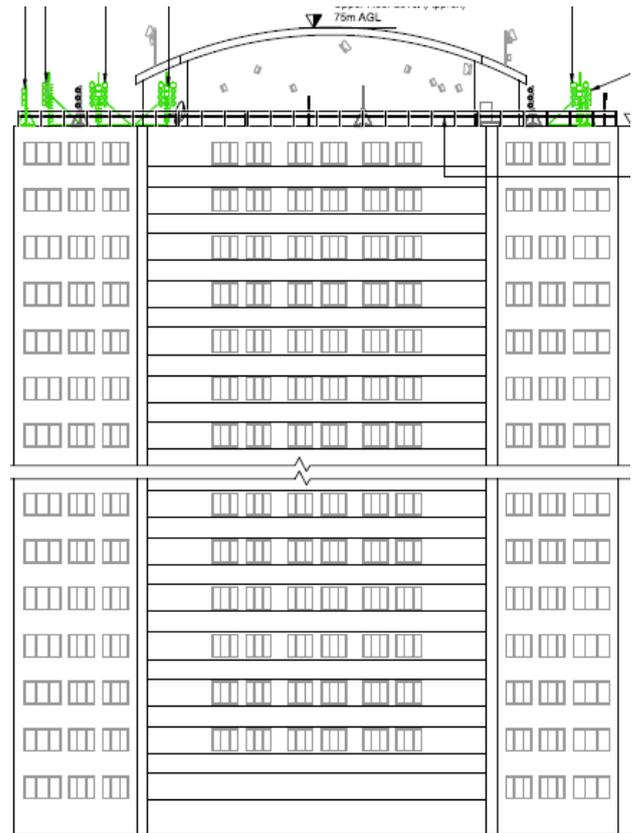
- Design and character
- Impact on the amenity of neighbouring residents
- Public Health

Design and Character

- 9.2 The National Planning Policy Framework (NPPF) has been considered in the assessment of this application. Policy DM2.1 states that all forms of development should be of a high quality and make a positive contribution to the local character and distinctiveness of an area, based upon an understanding and evaluation of its defining characteristics.

- 9.3 Development Management Policy DM2.3 states that Islington's historic environment is an irreplaceable resource and the council will ensure that the borough's heritage assets are conserved and enhanced in a manner appropriate to their significance. In this instance, whilst the application site is not within a Conservation Area, it is within close proximity to four different conservation areas. To the north is New River CA, to the east is Northampton Square CA, to the south is Clerkenwell Green CA and to the west is Roseberry Avenue. The closest of which is New River that is approximately 60m to the north for the site.
- 9.4 Development Management Policy DM2.7 states that telecommunications and utilities equipment will only be permitted where they are sited and designed to minimise their visual impact, do not have a detrimental effect upon the character or appearance of the building or area, innovative design and technological solutions have been explored to minimise visual impact, and there is no reasonable possibility of sharing facilities.
- 9.5 Michael Cliffe House is a mid-twentieth century building in an area which exhibits a wide variety of building sizes and typologies. Whilst the building is surrounded by Conservation Areas, the majority of nearby properties in the immediate area are of mid to late 20th century construction, at heights much lower than Michael Cliff House.
- 9.6 The application property is 24 storey building in residential use, situated to the west of St Johns Street and to the north of Skinner street, and forms the main building of a residential estate known as Finsbury Estate. It is located in the Central Activities Zone and within the Bunhill and Clerkenwell Core Strategy Key Area.
- 9.7 The proposal would lead to the installation of 86 pole mounted antennas on the roof of the property in addition to existing equipment. The purpose of these would be to provide improved wireless internet services to act as a wireless connection between pre-existing wired fibre broadband networks.





Samples antennas similar to those proposed



- 9.8 The supporting planning statement submitted with the application sets out that the building already hosts rooftop equipment which includes a base station for another operator, a weather station and handrailing around the roof.
- 9.9 The proposed development would lead to the placing of further equipment on all sides of the roof of the building. It is understood that in order to receive sufficient signal, the

proposed equipment is required to be sited towards the edge of the roof as the technology is dependent on a direct line of sight between 2 corresponding sets of antennas. The existing roof includes a 1.1m hand rail that borders the roof, inset from the buildings edge and there are various pieces of telecommunications equipment already installed at roof level. At the northern end of the roof three frames will be installed capable of holding 10 antennas each and one smaller frame capable of holding 3 antennas. To the southern end of the roof a further five frames capable of holding 10 antennas each will be installed and a single platform capable of holding three antennas will be installed. In total 86 antennas will be installed on top of the roof.

- 9.10 It is also proposed to install an equipment cabinet at roof level where previously this was proposed to be installed within an existing plant room. The cabinet is 2.5m high and positioned in the central location of the roof space and will therefore not be visible from the surrounding streetscene.
- 9.11 The application is supported by several photomontages, shown in images 4 to 6 which demonstrate the visibility of the structures in comparison to the existing building and existing structures on top of the roof.
- 9.12 In this instance the siting of the proposed equipment atop a relatively high 25 storey building means that views of the proposed equipment would be obscured in short views of the property from the surrounding streetscene.
- 9.13 It is acknowledged that there would be some visibility in medium to longer public views from the surrounding conservation areas. This is demonstrated by the photomontages in Images 4 to 6 which demonstrate that there would be some limited visibility from Tysoe Street and Roseberry Avenue to the west of the site located in the Roseberry Avenue Conservation Area. In addition to limited visibility from the Clerkenwell Green Conservation Area to the East on St John Street, Percival and Skinner Street and further visibility to the North from St John Street.
- 9.14 However, it is considered that the scale of the proposed antennas, set against the existing equipment on top of the roof would ensure that the structures would be assimilated into the main built form. The proposed antennas are not considered to overly dominate views of the building nor the setting of the adjacent conservation areas.
- 9.15 Overall, the proposed high level location limits the visibility of the structures in short views, it is acknowledged that there would be some limited views of the structures in medium and long views of the building which would lead to some limited visual harm.
- 9.16 Notwithstanding this, the level of visual harm to the streetscene and setting of the surrounding conservation areas is considered to be less than substantial. In accordance with Paragraph 196 of the NPPF where a proposed development will lead to less than substantial harm to the significance of a designated heritage asset (the surrounding conservation areas), this harm should be weighed against the public benefits of the proposals.

- 9.17 The importance the Government attaches to high quality communications infrastructure, and the related benefits this brings is also recognised. In this case, the public benefits of allowing the proposal would not contravene the statutory requirement to pay special regard to the conservation areas, designated heritage assets. The public benefits of the scheme are set out in the following section of this report.

Public Benefit

- 9.18 Paragraph 112 of the National Planning Policy Framework Infrastructure is essential for economic growth and social well-being. The Paragraph states that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology and full fibre broadband connections”.
- 9.19 Paragraph 196 of the National Planning Policy Framework states that 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 proposals, including where appropriate, securing its optimum viable use.
- 9.20 As demonstrated in the visual amenity section of this report, it is considered that the proposals would cause less than substantial harm to character than appearance of the surrounding conservation areas. It is considered that the public benefit of the wireless broadband provided by the proposals outweighs the less than substantial harm caused to the character and appearance of the conservation area. In accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in assessing the proposal hereby under consideration, special regard has been paid (and great weight given to “doing no harm”) to the desirability of preserving or enhancing the character or appearance of the surrounding conservation areas.
- 9.21 The benefits of the proposal, include the improvement of the wireless internet infrastructure and the resulting fast and ubiquitous access to the internet from the proposed fixed broadband wireless connection which can be used as an alternative to a wired fibre connection and to bridge a gap in the wired fibre network where a direct wired connection is logistically difficult.
- 9.22 The benefits of this type of connection in comparison to a traditional wired fibre broadband connection is that the wireless technology avoids the need for the trenching of a new fibre cable which can involve weeks of disruption where fibre cable need to be routed under pavements and roads.
- 9.23 It is considered that the connectivity improvements as a result of the proposals outweigh the less than substantial harm caused to the nearby heritage assets. The proposals would be visible in some long views within the surrounding Conservation Areas, however their design and their siting are for the purposes of achieving maximum efficiency.
- 9.24 The benefits of improved mobile infrastructure form the basis of public benefits that tips the balance to outweigh harm, in a manner that gives great weight to “preserving” or doing no harm on nearby heritage assets.
- 9.25 Overall, the proposed 86 antennas on top of the roof of the 25 storey Michael Cliffe House building are considered to result in significant public benefits, outweighed the less than substantial harm to the Surrounding conservation areas in accordance with Paragraphs 112 and 196 of the National Planning Policy Framework (2019).

Neighbouring Amenity

- 9.26 The proposals comprising the installation of 86 x dish antennas to short antenna poles mounted on 10 x freestanding support frames upon the roof of the building and the installation of 2 x equipment cabinets is not considered to raise any concerns in relation to sunlight, daylight and outlook from neighbouring properties. Further, the proposals would not raise any concerns in relation to privacy conforming with Policy DM2.1 of the DMP (2013).

Health Risks

- 9.27 Paragraph 116 of the National Planning Policy Framework states that Local Authorities must determine applications on planning grounds only. They should not question the need for an electronic communications system, or set health safeguards different from the International Commission Guidelines for Public Exposure.
- 9.28 Ofcom regulates the operation of mobile networks in relation to their use of radio frequencies and whilst it does not have any duties related to the recommendations for exposure to Electromagnetic Radiation Emissions, it does set out the need for certificates of International Commission on Non-Ionizing Radiation Protection (ICNIRP) compliance to be provided with planning applications and for operators to continue to ensure all sites remain compliant.
- 9.29 An ICNIRP Declaration from the manufacturer (Siklu Communication Ltd) was submitted with the application confirming that the proposed antennas would not generate electromagnetic radiation above thresholds that would pose a risk to the general public or workers responsible for maintaining the equipment.
- 9.30 Further, Public Protection Officer from both Islington and Camden Boroughs have reviewed the proposals with their comments as follows.
- 9.31 *In terms of health concerns regarding installations of this type, mobile phones and devices are new but the technology is not, and research has been ongoing in this area for almost 75 years. After a thorough review of the available scientific findings, the World Health Organization (WHO) reported: "To date, the only health effect from radiofrequency (RF) fields identified in scientific reviews has been related to an increase in body temperature (> 1 °C) from exposure at very high field intensity found only in certain industrial facilities, such as RF heaters. The levels of RF exposure from base stations and wireless networks are so low that the temperature increases are insignificant and do not affect human health" [Source: World Health Organisation, Fact Sheet 304, Base stations and wireless technologies, 2006]. In addition, the WHO notes that "Based on a recent in-depth review of the scientific literature, the WHO concluded that current evidence does not confirm the existence of any health consequences from exposure to low level electromagnetic fields" (<http://www.who.int/peh-emf/about/WhatisEMF/en/index1.html>).*
- 9.32 *The Advisory Group on Non-ionising Radiation summarised that: "...although a substantial amount of research has been conducted in this area, there is no convincing evidence that RF field exposure below guideline levels causes health effects in adults or children." [Health Effects from Radiofrequency Electromagnetic Fields – RCE 20, 2012].*
- 9.33 *In addition, the report 'Recent Research on EMF and Health Risk – Tenth report from SSM's Scientific Council on Electromagnetic Fields, 2015' notes that: "new studies on adult and childhood cancer with improved exposure assessment do not indicate any health risks for the general public related to exposure from radiofrequency*

electromagnetic fields from far-field sources, such as base stations and radio and TV transmitters.

- 9.34 *Radio base stations are designed to comply with the stringent, precautionary public exposure guidelines set out by ICNIRP (International Commission on Non-Ionizing Radiation Protection). These guidelines have been developed following a thorough review of the science including both thermal and non-thermal effects. UK radio base station installations have been surveyed by independent bodies and found to be hundreds, and sometimes thousands, of times below these guidelines. When ICNIRP reviewed their guidelines in 2009 they concluded: "ICNIRP reconfirms the 1998 basic restrictions in the frequency range 100 kHz–300 GHz until further notice." [Source: ICNIRP statement on the "Guidelines for limiting exposure to time-varying electric, magnetic and electromagnetic fields (up to 300 GHz)"] (As above, these guidelines are currently being revised, with consultation having been undertaken in July to October 2018 and the results being collated at the moment.)*
- 9.35 With telecommunications equipment Public Health have confirmed that risks from Electromagnetic Field(EMF) are low. Overall, it is considered that the electromagnetic radiation emitted by the proposed antennas would be minimal and would conform with ICNIRP Guidelines. As a result, it is considered that the proposed installation of antennas atop the roof of the building would not pose a risk to Public Health.

10. SUMMARY AND CONCLUSION

- 10.1 It is recommended that planning permission be granted subject to conditions.
- 10.2 A summary of the proposal and its impacts and acceptability is set out at paragraphs 4.1 to 4.9 of this report.
- 10.3 Great weight has been afforded to the desirability to "preserve" the character and appearance of the surrounding Conservation areas (Section 72). Whilst the proposed antennas will be visible from some medium to longer public views within the surrounding Conservation Areas, given the height of the existing building and the small scale nature of the proposed antennas set against the backdrop of the existing equipment on top of the roof, the harm caused is considered to be less than substantial.
- 10.4 The benefits of improved wireless fibre broadband infrastructure is considered to form the basis of public benefits that tips the balance to outweigh harm, in a manner that gives great weight to "preserving" or doing no harm.
- 10.5 As such, the proposed development is considered to accord with the policies in the London plan, Islington Core Strategy, Islington Development Management Policies and the National Planning Policy Framework and as such is recommended for an approval subject to appropriate conditions.

Conclusion

- 10.6 It is recommended that planning permission be granted subject to conditions as set out in Appendix 1 – RECOMMENDATION A.

APPENDIX 1 – RECOMMENDATIONS

RECOMMENDATION A

That the grant of planning permission be subject to conditions to secure the following:

List of Conditions:

1	Commencement
	<p>CONDITION: The development hereby permitted shall be begun not later than the expiration of three years from the date of this permission.</p> <p>REASON: To comply with the provisions of Section 91(1)(a) of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004 (Chapter 5).</p>
2	Approved plans list
	<p>CONDITION: The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>Supporting Planning Statement; LUM0002-04- Issue F; LUM0002-05 Issue F; LUM0002-03 Issue F; Declaration of Conformity for RF Exposure and Amended Statement (30th December 2019)- Luminet Solutions Ltd.</p> <p>REASON: To comply with Section 70(1)(a) of the Town and Country Planning Act 1990 as amended and also for the avoidance of doubt and in the interest of proper planning.</p>
3	Materials (Compliance)
	<p>CONDITION: The hereby approved development shall be constructed in accordance with the schedule of materials noted on the approved plans and within the Design and Access Statement. The development shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.</p> <p>REASON: In the interest of securing sustainable development and to ensure that the resulting appearance and construction of the development is of a high standard.</p>

APPENDIX 2: RELEVANT POLICIES

This appendix lists all relevant development plan polices and guidance notes pertinent to the determination of this planning application.

1. National Guidance

The National Planning Policy Framework 2019 and Planning Policy Guidance (PPG) seek to secure positive growth in a way that effectively balances economic, environmental and social

progress for this and future generations. The NPPF and PPG are material considerations and have been taken into account as part of the assessment of these proposals.

2. Development Plan

The Development Plan is comprised of the London Plan 2016, Islington Core Strategy 2011, Development Management Policies 2013, and Site Allocations 2013. The following policies of the Development Plan are considered relevant to this application:

A) The London Plan 2016 - Spatial Development Strategy for Greater London

Policy 7.4 Local character
Policy 7.5 Public realm
Policy 7.6 Architecture
Policy 7.8 Heritage assets and archaeology

B) Islington Core Strategy 2011

Strategic Policies

Policy CS 8 – Enhancing Islington’s character
Policy CS 9 - Protecting and enhancing Islington’s built and historic environment

C) Development Management Policies June 2013

- Policy DM2.1 – Design
- Policy DM2.3 – Heritage
- Policy DM2.7 – Telecommunications and utilities

3. Designations

- Bunhill & Clerkenwell Core Strategy Key Area
- Central Activities Zone
- Cycle Routes (Major)
- Bunhill & Clerkenwell Local Plan Area
- Article 4 Direction A1 to A2 (Rest of Borough)
- Article 4 Direction B1(c) to C3
- Heathrow Safeguarding Area

4. SPD/SPGS

Urban Design Guidelines