

Email: [jonathan.haddrell@needhamhaddrell.com](mailto:jonathan.haddrell@needhamhaddrell.com)

Our ref: JDH/TravelodgeLondonHolborn/UKB/DH  
Site ref: 78126

The Chief Planning Officer  
Camden Council  
Development Management  
Camden Town Hall Extension  
Argyle Street  
LONDON  
WC1H 8EQ



8 Hide Market West Street Bristol BS2 0BH

Telephone 0845 481 8952 Fax 0845 841 8491

[www.needhamhaddrell.com](http://www.needhamhaddrell.com)

## Planning Portal Submission

3 July 2013

Dear Sir

### UK BROADBAND

**Re: Proposed installation electronic communication apparatus for UK Broadband Limited at Travelodge London Holborn, 166 High Holborn, London, WC1V 6PB**

### SUBMISSION OF PLANNING APPLICATION

Following the prior consultation in connection with the above, the proposals are now finalised. Thus, on behalf of UK Broadband (UKB) we submit herewith a planning application for the installation of electronic communications apparatus at the above site. We accordingly enclose the following:

- i. The requisite completed planning application form
- ii. The requisite numbers of an O.S. site plan scale 1:2500 reference 78126-00-004-ML001 rev 1 showing the red line area.
- iii. Drawing nos. 78126-40-100-MD004 rev 4 (Site Plan), 78126-40-150-MD004 rev 4 Sheet 4 of 4 (North East Elevation), 78126-40-150-MD004 rev 4 Sheet 1 of 4 (South East Elevation), 78126-40-150-MD004 rev 4 Sheet 2 of 4 (South West Elevation) and 78126-40-150-MD004 rev 4 Sheet 3 of 4 (North West Elevation).
- iv. A Supporting Statement that includes the Design and Access Statement.
- v. A certificate of ICNIRP compliance.
- vi. A Supplementary Information Template.
- vii. CIL questionnaire.
- viii. Copy notice no.1

We would further specifically highlight that this application does not include a radio coverage plot as the installation will be a data transmission site. This site will provide the backhaul / high speed data Ethernet facilities to UKB by linking, via the point-to-point transmission dishes, other UKB sites in London rather than providing radio coverage to a designated area.

A cheque in the sum of £385.00 in respect of the appropriate fee shall be forwarded under separate cover bearing the requisite Planning Portal reference number, PP-02745183.

Arqiva indicated in its prior consultation letter that the Traffic Light Rating was green. The prior consultation carried out suggests this rating to be correct and we have not altered it.

Paragraph 82 of the ODPM Code of Best Practice clearly requires the provision of full supporting information and although UKB is not a mobile operator, we trust the supporting material submitted in fulfilment of this assists the determination of the application.

You will see from the documentation submitted that UKB is seeking to deploy a new high speed wireless network. To that extent there remain a number of variable factors and it is conceivable that some of the details of the proposed installation may have to be varied. For example, it is possible that panel or dish antenna positions and bearings may have to be adjusted as other corresponding sites in the emerging network actually get deployed. There is therefore a need for flexibility in the planning permission sought. Such flexibility is recognised as reasonable and appropriate in the prior approval procedures that apply for some forms of development permitted under Part 24 of Schedule 2 of the Town and Country (General permitted Development) Order 1995, as amended. In particular you will see at Condition A.3 (8), that statutory provision is made for the subsequent agreement of amendments following any approval forthcoming under these procedures.

It is clear that this mechanism is recognised by Government as being both appropriate and consistent with the relevant tests set out in Circular 11/95 – *The Use of Conditions in Planning Permissions*. Such a condition also has the added benefit of avoiding unnecessary future applications that would not be a good use of scarce public resources. Consistent with this approach, we therefore request the following condition be imposed on the planning permission sought:

*The planning permission shall be implemented in accordance with the approved drawings, except to the extent that the local planning authority may otherwise agree in writing.*

**Reason**

*To provide an appropriate degree of flexibility and control on any future minor changes*

Clearly with any such condition, it would still remain open for the Council to judge any possible future change as being sufficient to warrant a fresh planning application and so we trust our request can be met.

We would be willing to meet to discuss the merits of the application or to assist with any visits of the site and surrounding area and if that would help, please also let us know.

Please also take this application and the details contained within it as due notification under the relevant condition of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003. In particular, you are given notice of the operator's intention to install the electronic communications apparatus that is described in more detail in the application documentation (including the scale drawings) and to be located as shown on the application plans. As you may know, these general conditions replace those in the operator's licence that was withdrawn by virtue of the Communications Act 2003.

Page 3

We trust everything is in order, but if you do require any further information or clarification then please do not hesitate to contact me on the direct dial telephone number above or by email if more convenient.

Yours faithfully,



Jonathan Haddrell  
For and On Behalf of  
**UK Broadband and Arqiva Ltd**

Enc. as listed above