

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Bonnington Hotel	Site Address:	Double Tree Hotel, Former Bonnington Hotel, 98 Southampton Row, London, WC1B 4BH
National Grid Reference:	E 530387, N 181803		
Site Ref Number:	137295_O2	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing sites)

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	<u>No</u>
If no explain why: n/a upgrade of existing site		
Was the industry site database checked for suitable sites by the operator:	Yes	<u>No</u>
If no explain why: n/a upgrade of existing site		

Annual Area Wide Information to local planning authority

Date of information submission to local planning authority	07.10.2013
Name of Contact:	Gavin.Polkinghorn@camden.gov.uk
Summary of any issues raised:	List of existing sites and general rollout at that time within the authority.

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	31.01.2014
Was there pre-application contact:	Yes <u>No</u>
Date of pre-application contact:	n/a
Name of contact:	n/a
<p>Summary of outcome/Main issues raised: A pre-application consultation email was sent to the LPA on the 31.01.2014 which included site-specific draft drawings and outlined the need for the existing telecommunications base station to be upgraded and redeveloped. To date no comments have been received.</p> <p>Although no LPA comments have been forthcoming, as the proposal relates to the upgrade of an existing base station and the principle of telecommunication development is established on-site, it was considered appropriate to progress this application and seek the LPA's formal determination.</p>	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red	Amber	<u>Green</u>
<p>Outline Consultation carried out: A pre-application consultation email was sent to the ward councillors on the 31.01.2014 which included site-specific draft drawings and outlined the need for the existing telecommunications base station to be upgraded and redeveloped.</p>			
<p>Summary of outcome/Main issues raised: In an email dated 31.01.2014 Cllr Julian Fulbrook advised that there was no problems for me with the proposal.</p>			

School/College

Location of site in relation to school/college (include name of school/college):
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¹ Macro or Micro

No school or college were considered to have a direct of functional relationship with the site.

Outline of consultation carried out with school/college (include evidence of consultation):
n/a

Summary of outcome/Main issues raised:
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?	Yes	<u>No</u>
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	<u>No</u>
Details of response: n/a Full Planning application		

Developer's Notice

Copy of Developer's Notice enclosed?	<u>Yes</u>	No
Date served:	18.08.2014	

3. Proposed Development

The proposed site:

This application relates to an existing telecommunications installation, which is found on-site. For reference please see below a photograph of the base station in-situ: -



The telecommunications installation would be located on the rooftop of the Double Tree Hotel (Former Bonnington Hotel), on Southampton Row. The Edwardian hotel building has a wide, seven-storey red brick frontage with neo-classical proportions and stone dressings. It is within Bloomsbury Conservation Area and it is not a listed building. The surrounding area is characterised by a mix of building types that vary in height and land-uses.

Enclose map showing the cell centre and adjoining cells:

n/a

Type of Structure

Description:

To remove existing 6no. antennas and replace with 9no. antennas on 2no. existing and 1no. new support poles with stand-off brackets, install 9no. ancillary remote units together with associated ancillary development

Overall Height:

22.4metres

Equipment Housing:	n/a housed within existing equipment cabin
Tower/mast etc – type of material and external colour:	Galvanised steel / untreated
Equipment housing – type of material and external colour:	n/a housed within existing equipment cabin

Reasons for choice of design:

In this instance, the choice of design tabled in this application has been influenced by the existing base station's siting and appearance, existing 2G/3G network coverage and capacity as well as the added emphasis to cater for 4G coverage requirements. As part of a sequential approach to site selection an existing base station development made available as part of the CTIL initiative was identified at this site. However it is of note that the existing ground based installation in its current form does not meet the operator's technical requirements, hence the existing base station requires upgrading and redevelopment to maintain the existing 2G and 3G network coverage and capacity and provide a 4G network for both operators on a single shared structure. Such an approach keeps the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network, which is in accordance with NPPF.

It is also noted that the application site is found within Bloomsbury Conservation Area. The proposed antennas and their positions on the building offer a technically preferred solution, in which where possible the antennas will be tilted and orientated so as to provide cell specific coverage to the demands of the target area. Taking into account the existing arrangement and the character and appearance of the Conservation Area, the extent of development has been kept to a minimum and it is considered that the upgrade proposal will have a negligible visual impact on the rooftop, streetscape and skyline.

The proposed antennas will be fixed in three's on yolk arms to the existing and replacement support poles found in various positions across the roofline. The proposed antennas will be left in their manufactured form and will take a similar appearance to those they replace. In this regard although the proposed antennas will be seen from wider vantage points, it is considered that the level of visual impact has been kept within reasonable bounds when taking into account the extent and visibility of the existing rooftop antennas.

This upgrade proposal also includes new equipment housed internally within the existing rooftop equipment cabin. In this respect it is considered that the siting of the ancillary development makes best use of the existing facilities, thus avoiding any visual clutter on the roofline and maintaining the appearance of the host building.

In light of the above it is considered that every effort has been made to limit the visual impact of the upgrade scheme. It is considered that reasonable steps have been taken to achieve this by limiting the extent of development and grouping antennas together, in which the upgrade scheme will have a neutral impact on the host building. Accordingly, it is considered that the proposal when taking into account the siting and design of the existing rooftop base station would have a negligible visual impact on the Conservation Area, thus preserving its character and appearance.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached	<u>Yes</u>	No
<p>International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, Telefónica UK Limited operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of Telefónica UK Limited's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of</p>		

the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.

The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.

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

It was announced in mid 2009 that the Telefónica Group were to form a strategic partnership with the Vodafone Group to share their telecommunication infrastructure assets across Europe. In the UK this project was called 'Cornerstone' as saw both Telefónica UK Ltd, commonly known as O2 and Vodafone Ltd working closely together to pool their resources and infrastructure making substantial improvements to their 2G and 3G networks. This initial agreement between the two aforementioned operators broke barriers in addressing the historical limitations encountered in conventional mast share schemes. It allowed both organisations to consolidate a number of base stations through, where appropriate, sharing each others sites and in turn significantly reducing the environmental impact of their network deployment. Although infrastructure development formed part of Cornerstone, Telefónica and Vodafone have continued to actively compete in the telecommunications market place to retain and win mobile phone customers and both operators differentiate themselves on the quality of their customer experience. Although Telefónica and Vodafone share their infrastructure, they operate entirely independently as businesses with their own separate strategies and networks. Accordingly the key focus as part of Cornerstone was to build new sites which had the capabilities to provide coverage for both operators.

In February 2013, the Office of Communications, commonly known as Ofcom, who are the independent regulator and competition authority for the UK's communications industries announced the winners of the 4G mobile spectrum auction. 4G is the fourth generation of mobile phone technology and follows on from 2G and 3G. 2G technologies is predominately used for making calls and sending text messages, whilst 3G enables access to internet services more effectively through a mobile device. 4G services are intended to improve mobile broadband services into the future, enabling greater capacities of data to be shared via mobile technologies with speeds likely to be nearer those currently experienced via home broadband. Both Vodafone Ltd and Telefónica UK Ltd were awarded 4G licenses, hence they have entered into a new agreement in which the two companies now plan to jointly operate and manage a single network grid across the UK. This initiative strengthens the network infrastructure partnership between the two companies, previously rolled out as part of Cornerstone. This next phase of consolidation will primarily involve upgrading existing base stations to accommodate 4G technology and will be facilitated by Cornerstone Telecommunications Infrastructure Limited (CTIL), a newly formed joint venture company owned equally by Telefónica and Vodafone. The single grid infrastructure will enable both organisations to pool and consolidate their respective networks yet further while running two, independent, nationwide networks.

A retained base station site is required in this location in order to maintain existing network coverage and capacity, as well as catering for 4G network demands for both Telefónica commonly known as O2 and Vodafone.

Details regarding the general operation of the Telefónica and Vodafone networks can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the Local Planning Authority in understanding any technical constraints on the location of the proposed development. Supporting information can also be found in the attached CTIL document called 'Radio Planning and Propagation', which discusses how radio networks are planned, the need for height and the limitations associated with the technology.

Furthermore the new Code of Best Practice on Mobile Phone Network Development published by the Mobile Operators Association (MOA) in July 2013 explains the special operational and technical considerations, which the telecommunications industry encounters. It also details the evolution of mobile networks and discusses the implications of mobile connectivity in the 21st Century. The new Code of Best Practice on Mobile Phone Network Development explains how mobile networks function and the challenges faced in providing sufficient signal, coverage and capacity to supporting customer experiences. It is also of note that the MOA has produced a new guidance document to clarify some of the technical aspects of network development entitled 'Mobile Networks: What They Are and How They Work', August 2013.

5. Site Selection Process

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 & Address	National Grid Reference	Reason for not choosing
n/a	n/a	n/a	n/a

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

In accordance with the operators licence obligations, NPPF and the Code of Best Practice on Mobile Phone Network Development, CTIL have reviewed existing telecommunications provision operated by Telefónica and Vodafone in the intended target area. An existing base station has been identified in which taking advantage of the CTIL agreement a sequential approach to site selection has been taken in seeking to upgrade this particular installation. Furthermore it should be acknowledged that alternative sites would have been considered by the operator and determining planning body when this now existing base station was first conceived and established on-site.

Planning Policies

Local Planning Policy

In accordance with the Planning and Compulsory Purchase Act 2004 (as amended) and National Planning Policy Framework, it is acknowledged that the Council's approach to the plan-led system has evolved. It is acknowledged that Central Government seek to streamline the process for the preparation of Development Plans, in which Local Planning Authorities are now required to adopt a Local Plan. Formerly known as the Local Development Framework, a Core Strategy is normally a central document in the Local Plan, which together with other planning documents is intended to shape future development and set the overall strategic planning framework for authority. In this regard, the Local Plan has now been adopted by the Council, in which there is no policy specific to telecommunications development.

However, as the site is within Bloomsbury Conservation Area, policy DP25 – Conserving Camden's heritage is relevant and states:

In order to maintain the character of Camden's conservation areas, the Council will:

- a) take account of conservation areastatements, appraisals and management plans when assessing applications within conservation areas;
- b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
- d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
- e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.

National Planning Policy

National Planning Policy Framework (2012)

National Planning Policy Framework states in paragraph 11 that 'Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise'. It is acknowledged in paragraph 12 that 'This National Planning Policy Framework does not change the statutory status of the development plan as the starting point for decision making and 'Proposed development that accords with an up-to-date Local Plan should be approved, whilst 'proposed *development that*

conflicts should be refused unless other material considerations indicate otherwise'. Furthermore, it considers that 'it is highly desirable that local planning authorities should have an up-to-date plan in place'.

Paragraph 13 of The National Planning Policy Framework is clear that this document 'constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications'.

5 - Supporting high quality communications infrastructure

The National Planning Policy Framework (NPPF) set out Central Government's planning policies for England and how these are expected to be applied. It replaces a number of planning documents including Planning Policy Guidance 8 - Telecommunication. NPPF sets out the Central Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Pertinent to telecommunications development section 5 of NPPF sets out the Governments general overview regarding supporting high quality communications infrastructure and is stated as follows: -

"42. Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.

43. In preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.

44. Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. They should ensure that:

- they have evidence to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*
- they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and telecommunications services.*

45. Applications for telecommunications development (including for prior approval under Part 24 of the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- 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 or technical site; and*
- 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 on non-ionising radiation protection guidelines; or*
- 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 and a statement that self certifies that, when operational, International Commission guidelines will be met.*

46. Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure."

12 - Conserving and enhancing the historic environment

Pertinent to development of the historic environment section 12 of NPPF sets out the Governments general overview regarding Conserving and enhancing the historic environment and is stated as follows: -

128. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be

proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.

In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

Code of Best Practice on Mobile Phone Network Development (2013)

A new English Code of Best Practice on Mobile Network Development has replaced the original guidance document that was first published in 2002. Since the previous version, there have been significant changes in planning policy with NPPF replacing PPG8, as well as in technology and infrastructure rollout due to consolidation agreements. The new Code of Best Practice is now more reflective of today's current practices, in which it is intended to be kept under review and will be updated every 18 months to take onboard any matters arising. The planning process and tools in the new Code of Best Practice remains much the same as previous, in which the following is considered relevant in this particular case: -

The opening paragraphs of the new Code of Best Practice acknowledge the material weight that should be given to NPPF, in particular Section 5 - Supporting high quality communications infrastructure as noted above. It is noted in paragraph 3.2 that special operation and technical considerations should be taken into account in which it is stated that due to increased demands of mobile device users there will be *"the requirement to upgrade and improve networks through changes to existing sites and the development of new sites"*

It is highlighted in paragraph 7.5 and in Appendix A which sets out the operators Ten Commitments that there will always be an emphasis on site sharing. Operators will *"continue to work together to locate base stations on existing structures, and to share sites wherever viable in order to reduce the need to build new masts on which to locate their equipment and to minimise the number of base station sites in the UK."*

Appendix B discusses the general principles for telecommunications development. It is stated that *"The Government's general policy on telecommunications development is to facilitate the growth of efficient and effective telecommunication systems whilst keeping the environmental impact of such development to a minimum. The siting and design of telecommunications equipment, if undertaken with care and sensitivity, will be vital in achieving this policy aim. Good siting and design should not only be respected in environmentally sensitive areas but should also be applied to all telecommunications development. In all circumstances, the sensitivity to context of the proposed development should be considered."*

In particular, the following general design principles should be regarded as important considerations in respect of telecommunications development:

- *Proper assessment of the character of the area concerned*
- *Design should be holistic and three dimensional showing an appreciation of context;*
- *Analysis of the near and far views of the proposal and to what extent these will be experienced by the public and any residents;*
- *Proposals should respect views in relation to existing landmarks and distant vistas;*
- *Proposals should seek to consider the skyline and any roofscapes visible from streets and spaces;*
- *Choice of suitable designs, materials, finishes and colours to produce a harmonious development and to minimise contrast between equipment and its surroundings.*

The options for the design used by an operator will be affected by site conditions, technical constraints, landscape features and coverage and capacity requirements. The main options would include:

- *Mast and/or site sharing;*
- *Installation on existing buildings and structures;*
- *Camouflaging or disguising equipment where appropriate;*
- *Using small scale equipment;*
- *Erecting new ground based masts."*

Appendix B goes on and recognises that mast and site sharing is a longstanding Government policy objective. In this regard the Government encourages telecommunications operators, wherever viable, to share masts and sites

as a means of minimising overall mast numbers. It is stated in Appendix B that *"If operators are able to share sites, and install more equipment on each site, this reduces the overall visual impact of network infrastructure, because even though shared sites will tend to be slightly bigger, it means that fewer sites are needed to improve coverage and capacity, infrastructure becomes more feasible, and is more cost-effective to deploy. In fact, sharing of sites is now the norm, and network operators now share much of their network infrastructure via joint venture commercial arrangements."*

Mobile Networks: What They Are And How They Work (2013)

It is highlighted that the new Code of Best Practice is supplemented by a document titled 'Mobile Networks: What They Are And How They Work'. It explains the main factors that affect radio signals such as shadowing, attenuation, diffraction and reflection. In this regard it should be appreciated that antennas need to be sited with the clearest possible view of the area for which they are intended to provide coverage. It is stated that *"there are various reasons that can lead to the need for new cell sites. Two main ones are the need for additional coverage and capacity. Other factors that can lead to the need for new sites include the introduction of new technologies and services; new property developments in an area requiring new coverage or additional capacity; or redevelopment of an area requiring existing sites to be replaced."*

Planning Assessment

In the absence of a specific local policy on telecommunications development, National Planning Policy Framework (NPPF) is the most relevant and appropriate material planning consideration in the determination of planning applications.

The National Planning Policy Framework (NPPF) does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12). The NPPF adds (paragraph 215) that due weight should be given to relevant policies in existing plans according to their degree of consistency with the framework; the closer the policies in the plan to the policies in the Framework, the greater the weight that they may be given as a material planning consideration.

It is highlighted that National Government policy advocates the use of installation/sites to be upgraded first, before looking at fresh new sites. In taking a sequential approach to site selection, the starting point is with existing masts and/or sites, in which this is. This is an existing Telefónica/Vodafone site providing 2G, 3G and 4G coverage. The upgrade of the existing Telefónica/Vodafone rooftop installation seeks to improve both coverage and capacity of Telefónica and Vodafone's 2G, 3G and 4G network on one structure to form part of a single network grid restructuring across the UK, building on and further improving the existing sites capabilities, coverage and capacity, creating a robust infrastructure network.

Following a technical review of the cell area, it was concluded that there is no better site in balancing the technical requirements of the operators, whilst minimising environmental impact. Therefore, the site remains the operators technically preferred location as it firstly fulfils their primary coverage objectives for 2G, 3G and 4G technology within the cell area but also given that it has an established coverage footprint within the respective networks and therefore forms part of a cohesive network of cells for each operators network. The proximity of each base station is an influential factor from a radio perspective and this ensures that the installation has sufficient separation from existing and planned new cells within the shared network, preventing the base station from causing any technical interference between sites. Each cell site sends and receives signals within its intended area of coverage and as the user travels from one area to another, the base station where the call originated weakens and hands over the call to the neighbouring base station. If the distance between base station sites is too large a gap between cells will form resulting in a dropped call. Similarly should telecommunications sites be too close together, this creates technical interference between the two sites and within the wider network as sites compete with each other to become the dominant cell.

Furthermore, the reduction (or decay) in signal power is affected by a number of variables, in which the main factors are frequency, distance (from transmitter), terrain (such as hills), clutter (such as buildings, foliage, vehicles, and water) and atmospheric conditions (such as rain). Any physical object such as buildings and geographical terrain (hills and trees) together with changes to the landscape (new developments and tree growth) that obstructs the propagation of radio signals, causes a reduction in signal strength reaching a customer's device. A reduction in the strength of the radio signal increases the likelihood of lower quality or dropped calls and significantly reduced or no data rates for internet browsing, for example. To ensure sufficient services are provided and coverage is maintained single or dual stack antennas cannot be lower than they were originally as coverage would be significantly reduced. Therefore, to provide sufficient services to customers height increases on existing masts or additional new masts may be required. The former is the preferred option in many cases.

The 3no. existing pole mounts accommodating 2no. antennas each, 6no. in total are fixed to the walls of the roof top plant rooms so that they can be justified from a technical perspective as the antennas need to clear the

immediate roof so as not to create signal clipping and reflection. The height of a proposed antenna has to be offset against its positions on the roof, whereby the closer to the centre of the roof of the building the more height that is needed to clear the immediate roof space in front of the antenna. The heights of the existing antennas are at 21.2metres and 22.4metres to the top, whilst the new antennas would be 21.2metres and 22.4metres to the top. In this regard the height of the antennas will remain the same, however, 1no. set of antennas would be increased in height from 21.2metres to 22.4metres. The proposed height is necessary to retain and significantly improve the continued need for both coverage and capacity of the existing networks. The proposed height and structure type will also cater for future 4G coverage demands which will enable network restructuring towards a single grid network that can serve both operators. Allowing for the proposed height and once this phase of upgrade rollout is complete it will allow existing base stations elsewhere in each respective network to be reviewed and decommissioned where technically feasible. In this regard the height and robust extent of development proposed will aid network consolidation and limit future infill requirements.

The number of antennas on each of the 3no. pole mounts would increase to 3no. antennas by a new stand-off bracket resulting in 9no. antennas in total. The face of each antenna is small and rectangular in shape. The existing antenna height and arrangement would be maintained as they offer the technically preferred solution, but the type, size and length of antennas would change. Where possible the antennas will be tilted and orientated to provide cell specific coverage to the demands of the target area. The ancillary remote radio units are to amplify the signal. The antennas are shared and limit the extent of physical development across the roofline and negating duplication. The radio equipment cabinets would be located within the existing rooftop equipment cabin. It is of note that normally the siting and design of proposed telecommunications equipment on rooftops is restricted due to the space taken up by individual operators. Similarly given the orientation of each operators antennas this sterilises space on the rooftop itself which implicate on exclusion areas where further telecoms development can not be sited. However the exclusive agreement in place between Telefónica and Vodafone mitigates such issues negating the duplication and thus limits the extent of physical development across the roofline.

The existing rooftop installation in its current form does not meet the operator's technical requirements, hence the existing base station requires upgrading and redevelopment to further improve the existing 2G, 3G and 4G network coverage and capacity for both operators on a single shared site. Such an approach keeps the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network, which is in accordance with NPPF. It is considered that there would be minor material change between the existing and proposed rooftop telecommunications development on the streetscape, skyline and Bloomsbury Conservation Area. However, this is clearly outweighed by other considerations such as technical requirements and negating the need for a new site for a single operator and and/or additional technologies, keeping the numbers of telecommunications masts to a minimum together with them being essential for sustainable economic growth and having vital social and environmental roles and benefits.

In light of the above, it is considered that every effort has been made to limit the visual impact of the upgrade scheme. It is considered that reasonable steps have been taken to achieve this by the antennas being set back from the buildings edge, limiting the extent of development and grouping the antennas together, in which the upgrade scheme will have a neutral impact on the host building. Accordingly, it is considered that the proposal when taking into account the siting and design of the existing rooftop base station would have a negligible visual impact thus preserving the character and appearance of the host building and Bloomsbury City Conservation Area.

From the outset, it should be appreciated that irrespective of the installation's use as a telecommunications base station, the change in form of an existing tall structure will always be, to some degree, a noticeable alteration to those residents and regular passers by found closest. However it should be recognised that visibility or a development's siting and appearance, most notably in this instance the site being within Bloomsbury Conservation Area does not automatically result in an overwhelming adverse harm. Similarly, it should be acknowledged that the presence of the existing telecommunications installation on-site may result in a number of preconceptions regarding the new proposal now subject to this application. In reflection it should be appreciated that these opinions may actually derive from the previous planning history and or the siting and appearance relating to the now existing mast. Irrespective of these viewpoints and what has gone before, it should be acknowledged that the existing base station is now established on-site, in which this provides a good reference point for the upgrade scheme's siting and appearance.

In light of the above it is considered that the planning assessment of this case should concentrate on whether the proposed changes in terms of its form when compared to the existing development are significant as to outweigh other material planning matters. Indeed it should also be ascertained as to whether there is still a need for the base station and if there have been any notable changes in terms of the site specific siting and surroundings which should be given material weight. Also the latest proposal subject to this application should be reviewed

against the up to date planning policy regarding telecommunications development.

As discussed previously with regards the choice of design when comparing the appearance of the existing installation with the proposed scheme, it is considered that the upgrade development will not undermine the visual amenity of the area. The upgrade proposal has dual user capabilities whereby balanced against the other material planning matters as below, it is considered that the CTIL scheme is acceptable.

With regards the need for the development it has been highlighted previously that the existing base station requires upgrading to meet the existing and future demands of mobile users. In this respect it's continue presence and operation is essential in providing network coverage for both Telefónica and Vodafone. The Government encourage the growth and provision of a modern telecommunications infrastructure, in particular 4G, in which it should be recognised that mobile coverage is a key component that will aid social and economic prosperity.

It should be acknowledged that a sequential approach to site selection has been taken. The upgrade proposal will facilitate mast sharing and provide multiple technologies whereby it should be noted that it seeks to replace an existing ground based installation found at the application site. It should therefore be acknowledged that the upgrade proposal would not increase the proliferation of telecommunications apparatus within the area, as the proposal is a direct replacement for that which already exists on-site. Taking into account the context in which the upgrade proposal would be read, it is considered that this site remains an appropriate location to site a telecommunication base station. The scheme would be set on private land, in which its siting would not impact upon recognised pedestrian and vehicular movements. There are commercial properties in the immediate locality, but the pole mounted antennas are set back from the edge of the building. These are all considered features and a context that would help assimilate the base station's change in form into this particular environment. In light of the above, it is considered that the upgrade proposal would not be overly intrusive in this particular environment. Taking all matters into account, it is the applicant's opinion that the visual impact as a result of the proposed changes would not outweigh the other material merits of this case.

It is recognised that the existing base station was determined prior to the adoption of the aforementioned National Planning Policy Framework. NPPF, in particular Section 5, should now be given significant weight especially as there are general moves away from locally based telecommunications policy. Nevertheless it is evident that the guiding factors of telecommunications policy have not altered significantly since the existing mast was established on-site and the key material considerations are deep rooted in planning policy. In this regard it is reasonable to presume that NPPF has derived from PPG8 which was applied in the first instance. As previously highlighted the Code of Best Practice on Mobile Network Development has updated and is more reflective of today's current practices. Therefore it is considered that there is limited material conflict between the latest adopted national planning policies used today when compared to the policy context that has gone before. Similarly taking into account the local planning policies which are now applicable, it is considered that the upgrade proposal accords with the Council's Development Plan.

In light of the case presented above, the applicant considers that the upgrade proposal strikes a good balance between environmental impact and operational considerations.

Health & Safety

Court cases have confirmed that the public perception of health risks can be a material consideration within the planning system. That said the weight to be attached to this issue has to be determined accordingly in each case by the decision maker. However it has been generally upheld and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been demonstrated that the proposed base station will comply with the International Commission on Non-Ionizing Radiation Protection guidelines.

It should be recognised that it has been long since established that it is Central Government's stance that the planning system is not the appropriate mechanism for determining health safeguards. It remains Central Government's responsibility to decide what measures are necessary to protect public health. Most notably it is Central Government's view that if a proposed development meets the ICNIRP guidelines for public exposure it should not be necessary for a Local Planning Authority, in processing and determining an application for planning permission or prior approval, to consider further the health aspects and concerns about them.

In this respect the operators believe that it is not necessary to consider health effects further. Telefónica and Vodafone as well established operators are committed to ensuring that all new and upgraded installations are ICNIRP compliant. In this regards there should be no basis for this case to be refused on health and safety grounds or for reasons relating to public concerns about health and safety. An ICNIRP compliance certificate is attached as part of this submission, as required by NPPF paragraph 45. As previously noted in this submission statement the ICNIRP declaration takes into account the cumulative effect of the emissions from the proposed

upgrade installation and all radio base stations present, at or co-located near to the proposed installation. Aibeit the upgrade proposal has dual user capabilities and seeks to provide multiple technologies the radio frequency emissions from the proposed development will be may times lower than the ICNIRP reference standard in all publicly accessible areas around the installation. In the light of the above information, it is clear that the weight to be given to such health and safety concerns should not be so great as to warrant a refusal of the case on these grounds.

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