



Our ref. CMN069

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Submitted via the Planning Portal

Recorded Delivery

Dear Sir,

PLANNING APPLICATION FOR THE INSTALLATION OF AN EQUIPMENT CABINET, THE REPLACEMENT OF THE EXISTING ANTENNAS AND ADDITIONAL MHAS ON THE ROOF OF LONDON SCHOOL OF HYGIENE AND TROPICAL MEDICINE, 1 KEPPEL STREET, CAMDEN, LONDON, WC1E 7HT.

We are planning consultants retained by MBNL to submit planning applications on their behalf. This proposal is for the upgrade of the existing Hutchison 3G UK Limited (H3G) site.

Enclosed you will find a full planning application prepared on behalf of H3G. H3G have been licensed to provide a Cellular Network based upon the Global System for Mobile (GSM) standard and Universal Mobile Telecommunications System (UMTS) within the United Kingdom.

The development consists of:

"The installation of a SAMO cabinet on a steel equipment platform, the swap out on a like for like basis of the existing antennas, additional Mast Head Amplifiers (MHAs) and associated development thereto".

Enclosed is the following:

- 1 cheque for £385 made payable to Camden Council
- Plans CMN069/Hyg & Tropical Med/27469/001,002,003,004,005A1
- Application forms
- ICNIRP Certificate

- Planning Statement (including heritage, design and access statement).

We trust you will find the enclosed information sufficient to register and validate the application. If however you require any further information, please contact Claire Pegg on 0161 956 4407 or claire.pegg@gva.co.uk

Yours sincerely

A handwritten signature in black ink that reads "GVA Grimley". The letters are cursive and fluid, with the "G" and "V" being particularly prominent.

GVA Grimley Ltd.
International Property Advisors

1. HERITAGE, DESIGN AND ACCESS STATEMENT

In May 2006 changes were introduced to the planning application process. These changes are set out in Government Circular 01/2006 '*Guidance on Changes to the Development Control System*'. Section 3 states the requirement for design and access statements to accompany applications for certain types of permission and consent.

In order to comply with the requirements for the submission of planning applications as outlined in Government Circular 01/2006 '*Guidance on Changes to the Development Control System*', the following design and access statement is enclosed in support of this proposal. The statement links the general development principles to the final detailed design.

1.1. HISTORY & BACKGROUND

In 2000 the Government completed their auction of the third generation (3G) mobile telecommunication licences and Hutchison 3G U.K Limited were successful in bidding for one of the five licences available. The 3G system, also sometimes referred to as Universal Mobile Telecommunications System (UMTS), offers high-resolution video and multimedia services including mobile office services, virtual banking and on-line billing, home shopping, video conferencing and internet access.

1.2. DESIGN

1.2.1. The proposal

The proposal is for the installation of an equipment cabinet, the replacement of the existing antennas and additional MHAs. The equipment is to be located on the roof of the building adjacent to the existing cabinets in the centre of the roof.

The host building is the London School and Hygiene and Tropical Medicine which is a three and five storey building. The building is Grade II listed but is located within the Bloomsbury Conservation Area, which is why this proposal necessitates a full planning application and listed building consent.

1.2.2. Design Considerations

The proposal has been carefully designed to ensure that the proposal does not blight the conservation area or listed building and does not have a detrimental effect on the surrounding conservation area.

1.2.3. Planning Policy Considerations

Section 54A of the Town and Country Planning Act 1990 (as amended)(now section 38 (6) of the Planning and Compulsory Purchase Act 2004) states that Local Planning Authorities should determine proposals in accordance with development plan policies, unless material

considerations indicate otherwise. Material considerations may include, inter alia, central government guidance, High Court and Inspector's decisions etc.

1.2.4. Local Policy

The core strategy was adopted in 2010 and the following policies are relevant in the determination of this proposal.

Policy CS14 – Promoting high quality places and conserving our heritage

The development policies DPD was adopted in 2010 and the following policies are relevant in the determination of this proposal.

Policy DP25 – Conserving Camden's heritage

Remaining saved policies of the Camden Unitary Development Plan

None relevant

London Plan 2011

None relevant

1.2.5. National Policy

National Planning Policy Framework

This legislation was introduced on 27th March 2012 and replaces Planning policy Guidance notes and Planning Policy Statements.

The legislation was introduced to help to achieve sustainable development, sustainable means ensuring that that we create better lives for ourselves and not creating worse lives for future generations. Development means growth.

In relation to this policy the following paragraphs are relevant in determining this application:

Section 5 – Supporting high quality communication infrastructure

Section 7 – requiring good design

Section 12 – conserving and enhancing the historic environment.

In relation to the above policies, the surrounding area comprises of a wide variety of uses. The building does have existing antennas and equipment cabinets on site and it is not considered that the addition of an additional equipment cabinet will be detrimental to the area or the building. The equipment cabinet has been carefully located away from the building frontage and is not visible from street level given the height of the building. The

proposal is therefore considered not to have a detrimental impact on the area or listed building and will preserve the character and appearance of the conservation area.

An ICNIRP certificate has been submitted as part of the application confirming that the proposal complies with guidelines.

1.2.6 Site Need and Identification

The proposal is to upgrade an existing site therefore no alternative sites were considered as the proposal has very little visual impact on the area or host building.

In addition to the above, the site will form part of an improved upgraded network for Hutchison 3G UK limited which will allow faster downloading and the reduction in call drop outs.

Coverage - The licence granted to H3G demands that strict coverage qualities are met. It is essential that the benefits of mobile telephones are available for all the population. The changing customer use of mobile phones also demands that networks and coverage is available at home, in the workplace, while shopping, enjoying leisure activities or while on the move.

Quality - In order to ensure coverage within buildings such as homes, shops, offices etc. the radio signal has to be of sufficient strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, some less than 1 km apart.

Capacity - As the use of and demand for mobile phones has increased the number of sites required to provide Network capacity has increased. Each cell or base station can only handle a finite number of calls so in areas of high use additional cells are required to meet demands on the network and thus avoid existing cells going into congestion.

The radio implication of the site: Radio signals are transmitted through the network by using fixed links at such frequencies that necessitate an uninterrupted line of sight. To achieve this, the installation must reach a sufficient height above surrounding buildings and trees. The installation must also be in a position to provide good in building radio coverage to the target area.

The planning tool identifies deficiencies in the network and predicts the location from which the optimum coverage will be provided. This area is referred to as the search area or cell centre.

It is for these reasons that it is important to achieve a service of quality for mobile users. The main complaints received by mobile telephone operators about their service relate to the problems associated with dropped calls and no service. As more and more people are using tablets and smart phones there is a need to ensure that existing sites can meet this demand. This is one such site as due to the location of the site there is a high level of traffic to the site.

1.2.7 Health and Safety

We are aware of media and press articles concerning Health and Safety issues associated with sites such as this site. We remind you that Government Guidance is given in the National Planning Policy Framework.

The proposal for this site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines and therefore Health and Safety concerns should not be a planning consideration. An ICNIRP certificate is submitted with this application.

In 2000, the Independent Expert Group on Mobile Phones (IEGMP – Stewart Report) recommended a precautionary approach to mobile telephony in general and stressed the need for more research. NRPB endorses this approach and its Advisory Group on Non-Ionising Radiation (AGNIR) has just published its findings:

The Operators have studied the science review produced by the Advisory Group on Non-Ionising Radiation (AGNIR) and welcomes the overall view that the evidence does not suggest any adverse health effects from radio frequency exposures at levels below guidelines.

In particular, AGNIR has stated that exposure levels in the vicinity of mobile phone base stations are extremely low and the evidence indicates that they are unlikely to pose a health risk.

AGNIR concludes “In aggregate the research published since the IEGMP (Independent Expert Group on Mobile Phones) report does not give cause for concern.” However, it suggests that continued research is needed since mobile phones have been in widespread use for a relatively short time. The operators fully support this view both in principle and contribute to independent, reputable research including the £7.3 million Mobile Telecommunications and Health Research programme. An ICNIRP certificate is submitted with the application.

1.3 ACCESS

Access to the site will remain unchanged, as will the on going traffic visiting the site. We do not envisage additional maintenance visits incurring, and being new equipment, the likelihood of requiring visits for repair is remote.

2 CONCLUSION

This is an upgrade of an existing site and the cabinet has been carefully positioned to ensure that it is not highly visible from the street scene, it is not considered that the proposal will have a noticeable impact on the listed building, conservation area or local area.

We hope the above information is sufficient for you to consider this application favourably.