

Our ref.78359 – Rada

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Chief Planning Officer
London Borough of Camden
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Submitted via the Planning Portal

Dear Sir,

FULL PLANNING APPLICATION FOR THE INSTALLATION OF 3 NO. POLE MOUNTED ANTENNAS AND THE INSTALLATION OF A CABINET WHICH MEASURES 600 X 600 X 1300 MM AND ANCILLARY DEVELOPMENT THERETO AT RADA 62-64 GOWER STREET, LONDON WC1E 6ED.

We are planning consultants retained to submit planning applications on behalf of Telefónica O2 UK Limited and Vodafone Limited who recently entered into a network sharing agreement. This arrangement allowed each company to share the other party's installation. In September 2012 approval was received from the Office of Fair Trading for the formation of a new company – Cornerstone Telecommunications Infrastructure Ltd (CTIL).

The development consists of:

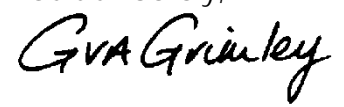
3 no. pole mounted antennas and the installation of a cabinet which measures 600 x 600 x 1300 mm and ancillary development thereto

Enclosed is the following:

- cheque for £385 made payable to Camden Council
- Application forms
- ICNIRP Certificate
- Planning Statement (including design and access statement)
- Coverage plots

We trust you will find the enclosed information sufficient to register and validate the application. If however you require any further information, please contact Rebecca Skerrett on 0161 956 4305 or rebecca.skerrett@gva.co.uk.

Yours sincerely,

A handwritten signature in black ink that reads "GVA Grimley". The script is fluid and cursive, with the letters "GVA" being more prominent and the "Grimley" part flowing from them.

GVA Grimley Ltd.
International Property Advisors

1. DESIGN AND ACCESS STATEMENT

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

There has not been any previous telecommunications applications on this site.

The site is located within Bloomsbury Conservation Area.

1.2. Background to CTIL

For some years Vodafone and Telefonica (O2) have been operating a network sharing agreement – broadly similar to the Orange/T-Mobile/Three arrangement. This arrangement allowed each company to share the other party's installation.

In September 2012 approval was received from the Office of Fair Trading for the formation of a new company – Cornerstone Telecommunications Infrastructure Ltd (CTIL).

1.3. The proposal

The application property is located on Gower Street and extends to Malet Street. The host building is 23 metres in height and is close to the university buildings. The area is highly urbanised and is located within Bloomsbury Conservation area.

The proposed development is for:

The installation of 3 no. pole mounted antennas. The pole mounts are located on the two corners of the building fronting Malet Street and the third sector is positioned on the roof fronting Gower Street. The cabinet will be positioned on the roof closest to Malet Street and is set back from the front elevation. The cabinet measures 600 x 600 x 1300mm and will not be visible from Malet Street.

1.5 Design Considerations

The antennas could not be face mounted due to the orientations that are required. Additionally the buildings surrounding the site are of a similar if not higher height and therefore the antennas had to be pole mounted. Given that the building is more than 23 metres in height and the surrounding roads are narrow the antennas will not be highly visible.

In addition all the surrounding buildings have various plant and machinery on the roof, therefore this installation will not be out of character with the area.

It is not considered that the installation will be detrimental to the Conservation Area. The antennas are located away from public vantage points and therefore permission should not be withheld.

1.6 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.

1.7. 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

In relation to these policies, the proposal is for a new telecoms site but it does utilise an existing building. The proposal will not have a detrimental impact on Bloomsbury Conservation Area, as it will not be visible from ground level due to the height of the buildings.

1.8 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:

Paragraph 17, “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

Paragraph 18 “the government is committed to securing economic growth in order to create jobs and prosperity, building on the country’s inherent strengths and to meeting the twin challenges of global competition and of a low carbon future.”

Paragraph 20 “To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century”.

In relation to the above paragraphs the additional site will ensure that there is improved coverage in the area as people now want to use phones and tablets where ever they are. The proposal is of a high design quality and does not blight the host building or the surrounding area.

Paragraph 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 number 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.”

In terms of the above, the proposal utilises an existing building and has been designed to minimise the visual impact of the installation on the streetscene. The proposed building is set back from the front elevation and will not be visible from ground level or from surrounding vistas.

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

Paragraph 188, “Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.

In terms of the above, we consulted with ward councillors and the LPA. A detailed account of the preconsultation is outlined in a later section.

1.9. Site Need and Identification

CTIL have searched in this area for a number of years for an infill site without any success. The surrounding area is predominantly owned by the University who do not want telecommunications on their buildings. Due to the height of the buildings in the area a streetworks installation would not be viable.

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

Coverage - The licence granted to CTIL 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.

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 and due to a large development in the area customers will be affected without the introduction of an additional site.

1.10. 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.

2.0. Consultation

Consultation was carried out with the local planning authority and Councillors Harrison, Francis and Madlani (by email) and to the Local Planning Authority. To date no responses have been received.

3.0. 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.

4.0 CONCLUSION

We are of the view that this proposal has been sensitively sited and will not be highly visible when viewed against the other plant and machinery of the adjacent sites and will not be visible from street level.

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