

**SUPPLEMENTARY INFORMATION**

1. Site Details

Site Name:	Royal National Hotel	Site Address:	Royal National Hotel
National Grid Reference:	530064, 182137		Bloomsbury London WC1H 0DG
Site Ref Number:	CTIL_140602	Site Type: <sup>1</sup>	Macro – Upgrade

2. Pre Application Check List

**Site Selection (for New Sites only)**

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

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		No
If no explain why:  After a phone call to the LPA it was felt that the industry database was a more up to date source of information.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

**Annual Area Wide Information to local planning authority**

Date of information submission to local planning authority	13/10/2015
Name of Contact:	Neil Storer, Gavin Polkinghorn.
Summary of any issues raised:	Strategic level pre-rollout meetings are held with the LPA to discuss the necessities of the project, benefits and best practice going forward. No response apart from a read receipt was received from the Network Update Plans supplied to Camden Council.

**Pre-application consultation with local planning authority**

Date of written offer of pre-application consultation:	08/04/2016	
Was there pre-application contact:	Yes	No
Date of pre-application contact:	N/A	

<sup>1</sup> Macro or Micro

Name of contact:	N/A
<p>Summary of outcome/Main issues raised:</p> <p>Prior to the submission of this application the applicant initiated pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues, however, due to the minimal nature of the proposal it was not considered necessary to pay the fee requested, therefore, no comments were received in respect to the consultation submitted at the time of submission.</p> <p>Strategic level pre-rollout meetings are held with the LPA to discuss the necessities of the project, benefits and best practice going forward.</p> <p>As emphasised during the roll out meeting the height increases are imperative for the combined O2 and VF network. The height increases will allow other masts in the area to be decommissioned once the CTIL project has been fully implemented in the UK. Please see the enclosed "height increase document" which gives further information on this specific topic.</p>	

### Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
<p>Outline of consultation carried out:</p> <p>Prior to the submission of this application the applicant initiated pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues. No comments were received in respect to the consultation submitted at the time of submission.</p> <p>Further consultation with the local Ward Councillors (Adam Harrison, Rishi Madlani, Sabrina Francis). Letters sent on 08/04/2016.</p>			
<p>Summary of outcome/main issues raised:</p> <p>No responses had been received from any of the Ward Councillors at the time of submission.</p>			

### School/College

<p>Location of site in relation to school/college (<i>include name of school/college</i>):</p> <p>There are no schools in close proximity as defined by the search criteria outlined in the CoBP.</p>
<p>Outline of consultation carried out with school/college (<i>include evidence of consultation</i>):</p> <p>N/A.</p>
<p>Summary of outcome/main issues raised:</p> <p>N/A.</p>

**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?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: N/A		

**Developer's Notice**

Copy of Developer's Notice enclosed?	Yes	
Date served:	11/04/2016	

### 3. Proposed Development

#### The proposed site:

The proposed site is an upgrade to an existing rooftop site, hosted on the Royal National Hotel (50 Woburn Place), a eight storey modern building situated on the western side of the A4200 opposite the junction with Coram Street. The site is overlooked by a number of tall buildings of similar height on both sides of Woburn Place.

The building is approximately 30.90m high and the existing rooftop equipment (to be upgraded) is mounted on a raised plant room section of the roof. The main roof level is approximately 25.5m above ground level however, the raised section of roof housing the antennas reaches a height of approximately 30.9m. The antenna mounting area has been set back from the edge of the roof to maximise the screening effects provided by the existing structure when viewed from ground level. The proposed replacement antennas are to be fixed on the existing support poles or behind existing antennas wherever possible.

The building is located within the Bloomsbury Conservation Area and is not listed although there are a number of listed buildings in the immediate vicinity of the site. The proposed upgrade has been carefully designed to minimise the impact on the site and its setting within a conservation area and the proposed upgraded equipment is to be mounted in the same area of the rooftop and using the existing supporting structures. The upgrade will also require minor alterations to ancillary equipment which will be unseen within the existing equipment room.

Due to the small scale of the proposed upgraded equipment in comparison to the overall bulk of the host and surrounding large buildings, the visual impact of the upgrade will be minor.

The existing site has been carefully selected in a well screened and discretely mounted rooftop location overlooked by numerous buildings of similar height and scale so as to provide the required improved coverage to the area whilst minimising visual intrusion for residential receptors. Much of the proposed and existing rooftop equipment has been set back from the edge of the roof, so as to enhance the screening effects provided by the overall height of the building.

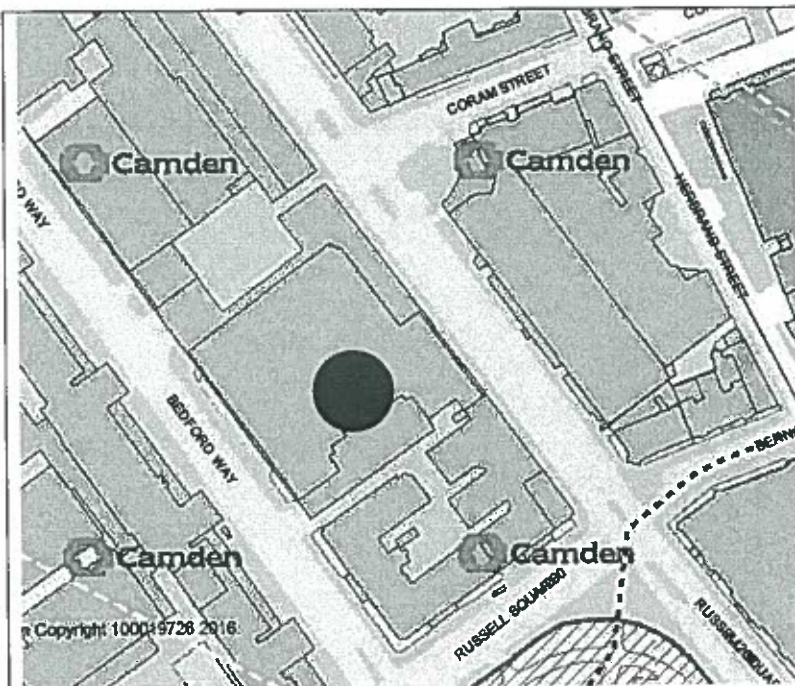
It is imperative to consider that this is not a new additional telecommunications installation but merely an upgrade to the existing, with the proposed upgrade eliminating the need for the installation of a separate ground based facility within the locale.

Site Ref (CTIL LONDON):	140602	Site Address:	50 Woburn Place, Bloomsbury, London, WC1H 0XF
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*Local Planning Authority:* LB Camden

*Development Plan:* LB Camden LDF Core Strategy DPD / LB Camden LDF  
Development Policies DPD

**Fig.1 – Local Plan Map (extract – reference only)**



Site and its surrounds

**Policy Relevant to the Development Site:**

The site is designated as being in the settlement boundary, with urban uses to the north, east, south and west. The site is in the Bloomsbury Conservation Area and the land designation that this site is located in is deemed to be a material consideration.

LB Camden does not have a specific telecoms policy. Therefore the NPPF is of relevance. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with the NPPF.

**Policy Analysis:**

Policy DP25 states that:

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

- a) take account of conservation area statements, 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..

The proposed works would not be to the detriment of the surrounding area (it would preserve

the character of the Conservation Area and not cause harm to the setting of nearby Listed Buildings), but is necessary to ensure improved delivery of service, and would respect and continue to maintain the appearance of the area, so according with the principles of the policy.

It accords with the requirements of the NPPF and the objectives of the London Plan (Policy 4.11 Encouraging a Connected Economy (March 2015))

Enclose map showing the cell centre and adjoining cells:



Type of Structure (e.g. tower, mast, etc):

Description:

Existing 2 no. TEF antennas to be replaced with 2 no. antennas fixed to antenna support poles. Existing 1 no. L26 Flexi fixed to wall below antenna at ground level to be removed.  
 Existing 2 no. TEF antennas replaced with 2 no. antennas fixed to antenna support poles.  
 Existing 1 no. L26 flexi fixed to wall below antenna at ground level to be removed.  
 Existing 2 no. TEF antennas to be replaced with 2 no. antennas fixed to antenna support poles. Existing 1 no. L26 flexi fixed to wall below antenna at ground level to be removed.

Ancillary equipment upgrades to involve removal of existing equipment and installation of upgraded flatpack racks and flexi modules all to be unseen within existing equipment room. The footprint of the existing equipment room is approximately 5m by 4m.

Overall Height: 32.10m

Height of existing building (where applicable):

30.90m  
(Approx.)

Equipment Housing:

Length:

See above

Width:

See above

Height:

See above

Materials (as applicable):

Tower/mast etc – type of material and external colour:

Standard.

Equipment housing – type of

Unseen within existing equipment room – equipment to

material and external colour:

be finished in grey.

Reasons for choice of design:

The proposed rooftop installation upgrade will facilitate improved coverage for Telefonica whilst utilising an existing facility and thereby eliminating the need to build a separate new ground based facility within the vicinity of the site. The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF.

Central Government attaches great importance to the design of the built environment and outlines this within Section 7 (para. 56) of the National Planning Policy Framework. It states:

*“Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”.*

In keeping with the National Planning Policy Framework (NPPF) guidelines of using: *“high quality communications infrastructure”*, the proposed rooftop design has been selected to minimise visual impact upon the street scene by integrating with the existing rooftop furniture and has been discretely mounted in a position set back from the edge of the roof with much of the proposed transmission equipment situated behind the existing antennas.

The presence of the existing rooftop base station sets a clear precedent for telecommunications development in this location and indicates that the principle of this proposal is acceptable in terms of siting. As stated above the National Planning Policy Framework advocates site sharing, and as such we believe that there are no sequentially preferable locations within the defined site search area.

The design of the proposed rooftop antennae and associated ancillary equipment being of small scale in comparison to the overall bulk of the host building is considered to be the least visually intrusive option available. Although it is accepted that the bulk of the antennas will increase marginally, it is felt that such a minor increase in the overall bulk of the installation would not detract from the character of the area in which the proposal sits.

Any other proposal to satisfy the identified requirement would result in the addition of a separate ground based column elsewhere in close proximity to the existing structure. In our opinion, such a proposal would, in this instance, unnecessarily add to the clutter in the streetscene and result in a greater visual impact.

4. Technical Information

<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)*</p> <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.</p> <p>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, Telefonica operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p> <p>As part of Telefonica'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 the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.</p> <p>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.</p>	<p>Yes</p>	
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5. Technical Justification

Reason(s) why site required e.g. coverage, upgrade, capacity

The site is required to provide enhanced coverage for Telefonica. This will improve coverage within the WC1H 0DG area. The cell search areas for 3G and 4G are extremely constrained with a typical cell radius of approximately 250m meaning that it would not be feasible to site the column outside of this locale.



The development of this dual utilisation site will eliminate the need to build two separate ground based installations thereby complying with national and local planning policies which encourage the sharing of telecommunications facilities.

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information on Radio Network Development for Planning Applications'. This information is provided to assist the local planning authority in understanding any technical constraints on the location of the proposed development.

6. Site Selection Process – alternative sites considered and not chosen. Please note that this proposal is to upgrade an existing telecommunications facility.

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

This is an upgrade to an existing site thus no other standalone new facilities have been investigated. A new additional mast to facilitate the upgrade would not be in line with NPPF. By upgrading the current facility the most sequentially preferable option has been progressed.

As part of the single grid consolidation our radio engineers considered a number of surrounding sites with a view to their upgrade as an alternative to the proposal site, however, it was found that upgrade of these sites could not provide the level of service to meet the local demand from residents and businesses in this specific locality and therefore it was deemed necessary to upgrade this site.

Land use planning designations:

The site is in a Conservation Area (Bloomsbury) and the land designation that this site is located in is considered to be a material consideration.

Additional relevant information (planning policy and material considerations):

This specific proposal forms part of an integral requirement for Vodafone and Telefonica to expand their telecommunications network across London specifically in this instance to enhance coverage levels within the WC1H area.

Telefónica O2 UK Limited has entered into a network sharing agreement with Vodafone Limited pursuant to which the two companies plan to share network equipment on a number of sites across the UK. A joint project team has been created, called CTIL comprising Vodafone and O2 employees, to oversee these arrangements. This agreement allows both organisations to consolidate the number of base stations required through sharing which is in accordance with Government Policy, and therefore significantly reduce the environmental impact of network development

This partnership has resulted in the development and production of an array of “dual user” structures and cabinets, which have the ability to accommodate both operator’s antenna systems and radio equipment.

Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using their mobiles in their homes and this means we need to position base stations in, or close to, residential areas.

A further limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However if this overlap is too great unacceptable interference is created between the two cells.

**DEVELOPMENT PLAN POLICY.**

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, it is stated that:

*"Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise."*

### **NATIONAL PLANNING POLICY**

The National Planning Policy Framework (NPPF) was published on 27th March 2012. The NPPF supports high quality communications infrastructure and recognises it as a strategic priority. Part 5 of NPPF sets out the Government's planning policies on electronic communication infrastructure and how these are expected to be applied.

It is clear that the proposed works fully adhere to national guidance on telecommunications development. The works proposed for this site will ensure that residents and businesses within this area of Camden will continue to be serviced by the latest telecommunications technology. As detailed above, extensive consultation has been carried out with local stakeholders prior to the submission of this application, and an ICNIRP certificate of compliance is included with this submission.

### **LOCAL PLAN POLICY**

The relevant Local Plan policies (London Borough of Camden LDF Core Strategy DPD / LB Camden LDF Development Policies DPD) have already been highlighted in this planning statement. It is worth stating that this scheme seeks to ensure the scale and mass of the design is such that it is sympathetic to its surrounds (existing rooftop furniture) and the proposed works would not be to the detriment of the surrounding area (it would preserve the character of the Conservation Area and not cause harm to the setting of nearby Listed Buildings), but is necessary to ensure improved delivery of service, and would respect and continue to maintain the appearance of the area, so according with the principles of the policy.

In accordance with Policy DP25's requirement that telecommunications developments within Conservation Areas must preserve and enhance the character and appearance of the area, the site has been carefully selected in a partially screened position set back from the edge of the rooftop and the upgraded equipment is to be situated in the same position as the existing. It is important to note that the visual effects of the upgrade will be extremely minor.

### **London Plan**

The London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In Paragraphs 1.38-1.41 'Ensuring the infrastructure to support growth', the London Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that the city requires to secure its long-term growth. Such matters are further echoed by the Mayor's Offices long term strategy as documented in the London Infrastructure Plan 2050. It is considered that the Vodafone and Telefónica networks are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic

objectives contained in Policy 4.11 'Encouraging a Connected Economy' of the London Plan. Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform in allowing Vodafone and Telefónica to provide additional 2G, 3G and 4G coverage to the surrounding area.

The aim of the Infrastructure Plan is to enable fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 of the Plan indicates how the London Mayor's Office shall support an economically viable mix of technologies including fibre broadband, mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. This document is supported by the report Raising London's High Speed Connectivity to World Class Level. As detailed within these Digital Connectivity is now considered the fourth utility. Internet access not only affects the productivity of businesses and proves essential to the future growth of many firms, it is also vital for many residents to take part in modern society as more services move online.

The Mayor's Office shall work with central government and London's local authorities to ensure that strategic communication networks are enabled rather than inhibited by the planning and other regulatory systems whilst ensuring the utility works themselves are properly managed.

The Vodafone and Telefónica networks are integral elements in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

### **Conclusion**

We consider that the development is compliant with the council's policy and that in accordance with Section 38 (6) of the Planning and Compensation Act 2004 permission should be granted for the installation in particular as the proposed:

The visual effects of the proposed rooftop upgrade are relatively minor with the new upgraded antennas being of similar external appearance to the existing. The installation will provide environmental and commercial efficiencies by removing the need for an additional independent mast within the immediate vicinity and given the minor alternations to the visual appearance of the proposal it is not considered that it will result in any detrimental impacts on the surrounding area.

We consider the development complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community while minimising visual impact.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

On the basis of a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the requirements of the National Planning Policy Framework, London Plan and the Council's Local Plan Policies.

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Signed:		Date:	14/04/2016
Position:	Principal Planner	Company:	WHP Wilkinson Helsby
		(on behalf of CTIL and above operator)	