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

Dear Sir or Madam,

**PLANNING APPLICATION FOR THE UPGRADE OF AN EXISTING TELECOMMUNICATIONS SITE, ROYAL NATIONAL HOTEL, BEDFORD WAY, CAMDEN, LONDON WC1H 0DG.**

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 (H3G) UK Limited site.

Enclosed you will find a full planning application prepared on behalf of H3G UK Limited. 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 removal and replacement of 3 no. antennas and associated development".

Enclosed is the following:

- Cheque for £462 made payable to London Borough of Camden
- Drawings no. CMN017 01, 02, 03 A2.
- Planning Statement (including design and access statement)
- ICNIRP certificate

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 0161 956 4305 [Rebecca.skerrett@gva.co.uk](mailto:Rebecca.skerrett@gva.co.uk)

Yours sincerely,

GVA is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS.

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## **1. DESIGN AND ACCESS STATEMENT**

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.

This application upgrades the existing equipment to improve coverage and capacity in the area.

### **DESIGN**

#### **1.1.1. The proposal**

The proposal is for the upgrade of the existing installation at Royal National Hotel, Bedford Way, Camden London WC1H 0DG. The proposed work comprises the replacement of 3 no. antennas and associated development.

Royal National Hotel is an eight storey modern building located on the western side of the A4200 opposite Coram Street. The building is approximately 32.9 metres high. The equipment is mounted plantroom which raises to 33.9 metres with hand railing on top. The plantroom is located in the centre of the roof and is not visible from street level.

#### **1.1.2. Design Considerations**

The proposal upgrades the existing equipment and involves the replacement of 3 No. existing antennas with slightly larger antennas. The increase in the size of the antennas will be negligible when viewed from street level. It is also proposed to remove 3 No. antennas. There is also associated development in terms of signal amplifiers and cabling. The site is located within Bloomsbury Conservation Area and although the host building is not listed there are surrounding buildings which are.

The proposed upgrade utilises an existing site, visually there will not be much visual difference than the existing. The replacement antennas although are slightly larger when viewed from ground level will not be very different to the existing particularly when viewed from street level. 3 antennas are also proposed to be removed which therefore reduces the number of antennas on the site. The proposed changes are negligible and will not have an impact on the conservation area.

It is not considered that the proposal will have a detrimental impact on the host building or the surrounding area, and planning permission should not be withheld as this is an upgrade of an existing site which eliminates the need for an additional new site in the area.

#### **1.1.3. Planning Policy Considerations**

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.

#### 1.1.4. Local Policy

The current adopted development plan, relevant to the proposed development, comprises the London Plan 2016, the Council's Core Strategy, Development Policies document and Site Allocations document. These are discussed below:

##### The London Plan (2016)

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 Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications network, that London requires to secure its long-term growth.

It is considered that the applicants' 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 Plan, which states that:

*A: The Mayor and GLA Group will, and all other strategic agencies should:*

*a. facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located streetbased apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive broadband access meeting the needs of enterprises and individuals.*

*b. support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits."*

At paragraph 4.55 of the supporting written justification to policy 4.11, the Mayor "*wishes to ensure sufficient ICT connectivity to enable communication and data transfer within London, and between London, the rest of the UK and globally*" and "*...support ubiquitous networks – those supporting use of a range of devices to access ICT services beyond desk-based personal computers..*" Furthermore, at paragraph 4.57, the Mayor states the intention to "*...support competitive choice and access to communications technology, not just in strategic business locations but more broadly for firms and residents elsewhere in inner and outer London, and to address e-exclusion amongst disadvantaged groups.*"

Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing MBNL to provide a continued and improved range of coverage to the surrounding area.

## **Local Plan**

There are no policies relating directly to telecommunications development within the Council's policy documents. General policies of relevance include DP24 of the Development Policies document (Securing High Quality Design) which requires a high standard of development. Policy DP25 (Conserving Camden's Heritage) which requires development to preserve or enhance Conservation Areas and listed buildings.

It is considered the proposal complies with these policies as the design is appropriate to the location and upgrades an existing site. The antennas have been kept to the minimum height and away from the edges of the roof. Therefore the development would preserve the character and appearance of the conservation area and listed buildings in the area.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy the proposal is sympathetically designed, it minimises the number of installations as it upgrades an existing site and has a high quality of design. It would enhance the provision of local community facilities and services and would preserve heritage assets.

## **National Planning Policy Framework**

In relation to this policy the National Planning Policy Framework (NPPF) has the following paragraphs which 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 21<sup>st</sup> century".

In relation to the above paragraphs the 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."

Paragraph 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.

Paragraph 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.

Paragraph 116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated

In terms of the above, the proposal upgrades an existing site. The changes in the proposal are negligible and will not be visible from street level.

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

Paragraph 131 "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 valuable 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.

Paragraph 134. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Paragraph 137. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that

preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

Paragraph 141. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

Paragraph 156. Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

Paragraph 162. Local planning authorities should work with other authorities and providers to:

- assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and
- take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.

In terms of the above, we do not consider that the proposal will blight the host building as it is not dissimilar to what has already been approved on the site.

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 as this is a minor upgrade in a predominantly commercial area we have not undertaken preconsultation with the LPA as their fee is considered to be excessively high and is cost prohibitive.

#### **1.1.5. 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.

In addition to the above, the site will form part of an improved upgraded network for the operator 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.

#### **1.1.6. Health and Safety**

There are a huge number of papers with regard to the health effects of telecommunications. The scientific community have collated, summarised and assessed these publications in research reviews, the most influential in the UK being the Stewart Report (Mobile Phones and Health) by the Independent Expert Group on Mobile Phones under the chairmanship of Professor Sir William Stewart. These research reviews are used by Governments to develop policy on exposure to radio frequency signals.

Published in May 2000, the Stewart Report concluded that the balance of evidence did not suggest that exposures to radio frequency fields below international guidelines could cause adverse health effects, although it acknowledged that biological effects might occur below these values. The report stressed, however, that a biological effect does not necessarily mean a negative impact on health. Walking, drinking a glass of water or listening to music all produce biological effects.

Since 2000, over 30 further reviews have been carried out, carefully considering many hundreds of pieces of research. Most have made similar recommendations and have come to similar conclusions: that research should continue to address any gaps in the knowledge; and that overall, the possibility of adverse health effects from mobile communications remains unproven.

Further, the reviews stress that exposures from base stations (or masts) are, in the words of the National Radiological Protection Board (now part of Public Health England), "extremely unlikely to cause any effects on biophysical grounds." [A Summary of Recent Reports on Mobile Phones and health (2000-2004), NRPB, Jan 2005]



In June 2011 the World Health Organisation (WHO) noted that *"A large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have been established as being caused by mobile phone use"* WHO factsheet 193: Electromagnetic fields and public health: mobile telephones. In April 2012 the independent Advisory Group on Non-ionising Radiation (AGNIR) published a report entitled *"Health Effects from Radiofrequency Electromagnetic Fields"*. This report concluded that there is no convincing evidence that mobile phone technologies cause adverse effects on human health. AGNIR also found that although a substantial amount of research has been conducted, there is no convincing evidence that RF field exposure below the internationally agreed guideline levels applied in the UK causes health effects in adults or children.

In addition, the International Commission on Non-Ionizing Radiation Protection reviewed its guidelines in 2009 and concluded *"ICNIRP reconfirms the 1998 basic restrictions in the frequency range 100 kHz–300 GHz until further notice."* ICNIRP statement on the *"Guidelines for limiting exposure to time-varying electric, magnetic and electromagnetic fields (up to 300 GHz)"*.

Research reviews are used by guideline setting bodies and Governments to develop advice and public policy on exposure to the signal used by mobile communications technology.

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.

## **2. 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.

## **3. CONCLUSION**

This is an upgrade of an existing site; it is not considered that the proposal will have a noticeable impact on the surrounding area or the host building.

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