

Our ref. 98120/RETRO/VP

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Date: 08 August 2019

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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, COMPRISING THE INSTALLATION OF 3NO. ANTENNAS AND 1NO. GPS UNIT LOCATED ON THE ROOFTOP, AND ANCILLARY DEVELOPMENT THERETO, AT HOLBORN TOWER, 137 HIGH HOLBORN, CAMDEN, LONDON, WC1V 6PW**

We are planning consultants retained by MBNL to submit planning applications on their behalf. This proposal is for the upgrade of the existing EE & H3G site.

Enclosed you will find a full planning application prepared on behalf of EE & H3G. EE & 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 3No. antennas and 1No. GPS unit located on the rooftop, and ancillary development thereto."*

Enclosed is the following:

- Drawings no. CMN028 – 01, 02, 03, 04 – A3
- Application forms
- Planning & Heritage 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 Victoria Parsons on 0161 956 4123 or [victoria.parsons@avisonyoung.com](mailto:victoria.parsons@avisonyoung.com).

Yours sincerely,

*V. Parsons*

**Victoria Parsons**  
**Planner, Telecoms**  
**Avison Young**  
**For and on behalf of MBNL (EE Limited & H3G UK Limited)**

## 1.0. HISTORY & BACKGROUND

Everything Everywhere is a 50-50 joint venture between Deutsche Telekom and France Télécom and was formed in 2010 through the merger of the T-Mobile (UK) and Orange U.K. businesses.

On 3 September 2010, Everything Everywhere announced that Orange would join Mobile Broadband Network Ltd (MBNL), the joint venture management company formed in December 2007 between T-Mobile UK Ltd and Hutchison 3G UK Ltd (H3G UK).

In 2016, Everything Everywhere were chosen to work in conjunction with the Home Office to deliver the Emergency Services Network (ESN), which will deliver a smarter, better and cheaper communications capability.

This application upgrades the existing equipment.

### 1.1. DESIGN

#### 1.1.1. The proposal

The proposal is for the upgrade of the existing telecommunications site located at Holborn Tower, 137 High Holborn, Camden, London, WC1V 6PW. The proposed scheme comprises the installation of 3No. antennas and 1No. GPS unit located on the rooftop, and ancillary development thereto.

The site is located in Bloomsbury Conservation Area. The scheme proposes the installation of 3 additional antennas. As more than 3 antennas have been installed since 21<sup>st</sup> August 2013, a full planning application is required.

#### Heritage

Bloomsbury Conservation Area's appraisal and management strategy was adopted in April 2011. The Conservation Area covers approximately 160 hectares, extending from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south and from Tottenham Court Road in the west to King's Cross Road in the east.

Holborn Tower is described within the document as "a 1960s twelve-storey tower that is out-of-scale and character with the surrounding area". It "dominates long views and is out of keeping with the grain and scale of the sub area". Upgrading the existing equipment on this building ensures that sufficient coverage can be provided to the area without the need to install a new site on any sensitive buildings in close proximity.

It is not considered that the proposal will have a detrimental impact on the heritage or character of the Conservation Area. The proposed antennas and GPS unit will be located away from the immediate roof edges on the upper roof level, which will limit the view of them when viewed from ground level within the Conservation Area. The proposal is viewed in light of relevant planning policies in **Section 1.14** of this Planning & Heritage Statement.

#### 1.1.2. Design Considerations

The proposed upgrade utilises an existing site where possible and visually there is little change to the existing equipment, particularly when viewed from ground level. The 3 additional antennas and 1 GPS unit will be located on steelwork on the upper rooftop, at a height of approximately 52 metres above ground level. The visual impact of the equipment is limited from ground level, and the existing antennas are only slightly visible

in long views.

View looking West on High Holborn



View looking East from Bury Place



The proposed GPS unit is very small and will not be visible from ground level due to its size and positioning.

Additionally, the site is shared by two operators (EE & Three) which complies with national and local planning policy related to site sharing.

The proposal will not cause any access issues for either road users or pedestrians. It is not considered that the proposal will have a detrimental impact on the character of the Conservation Area, and permission should not be withheld.

### **1.1.3. 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.

### **1.1.4. Local Policy**

The Camden Council Local Plan was adopted on 3rd July 2017. It contains no policies directly relevant to the installation of telecommunications equipment within the borough, although paragraph 5.10 Digital Infrastructure, in relation to Policy E1 – Economic Development, does state that the Council recognises the importance of digital infrastructure, including telecommunications.

In relation to Policy E1 – Economic Development, the proposal will allow for improved coverage to be provided in the area. This can contribute to economic development in the area, and also complies with the spirit of the NPPF. The proposal complies

specifically with Part h of the policy by allowing for the provision of high speed digital infrastructure.

In relation to Policy D1 – Design, the site has been sensitively designed, as the least amount of equipment is proposed to allow for the site to transmit and the height has been kept to a minimum, ensuring that the development respects local context and character. The existing equipment has limited views when viewed from ground level, and therefore it is not considered that the proposal will have a detrimental impact on the character of the Bloomsbury Conservation Area or the wider surrounding area as a whole.

### London Plan

The current 2016 Plan is still the adopted Development Plan, but the Draft London Plan is considered to be a material consideration in planning decisions and holds limited weight in the determination of applications.

The 2016 Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks that London requires to secure its long – term economic growth.

The Draft London Plan contains Paragraph 1.0.8 which states “Planning for a ‘smarter’ city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners.”

The equipment provides improved digital connectivity by increasing capacity, which is of a public benefit to both Londoners and visitors to the area. It will allow more people to utilise the network at once without call and data drop outs.

Paragraph 1.4.11 states “The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processed, opening up new markets and allowing more flexible working.”

The upgraded site will ensure that the level of connectivity in the area is sufficient to meet the rising demand of reliable data and digital services by the public. The proposed upgrade will allow the site to transmit enhanced coverage.

### Digital Camden

The Digital Camden document sets out Camden Council’s aims and objectives with regards to the delivery of digital infrastructure in the area. The upgrade of the existing site will allow for a sufficient level of coverage to be provided within the area which in turn will allow for better access to mobile technology and will allow the Council to utilise online services.

### London Infrastructure Plan 2050 – Update

Chapter 8 – Digital connectivity states that digital connectivity is vital and essential for businesses and citizens to take part in modern society. The upgrade of the existing site will allow for a sufficient level of connectivity to be provided within the area, thus keeping businesses and citizens at a technological advantage.

#### **1.1.5. National Policy**

#### **National Planning Policy Framework**

This legislation was formally adopted in July 2018 and replaces the previous version which was introduced in 2012.

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

**Section 6 – Building a strong, competitive economy**

**Section 10 – Supporting high quality communications**

**Section 12 – Achieving well-designed places**

**Section 16 – Conserving and enhancing the historic environment**

The following paragraphs need to be considered in relation to this policy:

Paragraph 80 – “significant weight should be placed on the need to support economic growth and productivity... this is particularly important where Britain can be a global leader in driving innovation.”

Paragraph 112 – “Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.”

In relation to these paragraphs, the Government’s Industrial Strategy sets out a vision to drive productivity improvements across the UK, and sets out a delivery programme to make the UK a leader in “artificial intelligence and big data”. The improvement of telecommunications capacity is imperative to allow for areas to be connected, and is essential for economic growth.

Paragraph 113 – “Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged.”

In relation to this paragraph, the proposal is for the upgrade of an existing site which utilises an existing building.

Paragraph 114 – “Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:

- a) They have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and
- b) They have considered the possibility of the construction of new buildings or other structure interfering with broadcast and electronic communications services.”

Paragraph 115 – “Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- a) 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, technical site or military explosives storage area; and

- b) 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 guidelines on non-ionising radiation protection; or
- c) 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.

In relation to this paragraph, the site is not located within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area, or any schools or colleges. An ICNIRP certificate is provided with this application to confirm that the proposal will not exceed International Commission guidelines. The proposal is for the upgrade of an existing site and therefore no alternative sites have been considered.

Paragraph 124 – “Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

In relation to this paragraph, it is not considered that the proposed upgrade will have a detrimental impact on the area. There will be little visual change from public vantage points as a result of the proposal.

Paragraph 189 – “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 relation to this paragraph, the relevant historic environment records are referred to within this document at **Section 1.2.1** under the sub-section **Heritage**, and the impact of the proposal on their significance is referred to in both **Section 1.2.2** and **1.2.4**.

Paragraph 196 – “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, where appropriate, securing its optimum viable use.”

In relation to this paragraph, it is considered that the proposal will lead to less than substantial harm to the significance of a designated heritage asset as it is for the upgrade of an existing telecommunications site which has been sensitively designed in light of the designation.

#### **1.1.6. 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.

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 & EE 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.

#### **1.1.7. Health and Safety**

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 majorly noticeable impact on the surrounding area, or on the character of the Conservation Area.

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