SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Bedford Hotel	Site Address:	Bedford Hotel, 83-93 Southampton Row, Bloomsbury, London, WC1B 4HD
National Grid Reference:	E530284, N181861		
Site Ref Number:	77520	Site Type:[1]	Macro

2. Pre-Application Check List

Site Selection

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: No register available.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: As this installation is required to replace an existing telecommunications site, which is due to be decommissioned, there is a very specific target area which needs to be serviced in terms of continued network coverage. Consequently, no alternative, existing installations would provide coverage to this area. Therefore, a new site within the area is required to replicate the existing coverage and ensure that there are no coverage holes created as a result of the imminent decommissioning of the current network cell.		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	16/1/2020
Name of contact:	

[1] Macro or Micro

Summary of outcome/Main issues raised:

A pre-application consultation letter was issued to The London Borough of Camden Council on 16th January 2020. This letter contained details of the proposed upgrade at this established telecommunications site, as well as design drawings. Feedback was requested from the Council.

A response was received from the Council requesting a fee of £989.02 to provide pre-application consultation feedback. Given that the proposed development relates to a replacement telecommunications site, which is due to be decommissioned, a new site must be identified and progressed at the earliest possible opportunity to ensure that there is no coverage hole created in the local area. As such, it was considered appropriate, in this instance, to move directly to planning stage and submit a formal planning application.

Community Consultation

Rating of Site under Traffic Light Model:		Amber	

Outline of consultation carried out:

A pre-application consultation letter was issued to the local Ward Councillors of the Bloomsbury Ward. Detailed design drawings of the proposal were provided alongside the consultation letter and feedback was requested.

An extensive neighbour notification was also undertaken as part of the pre-application consultation exercise for this proposal. The following properties were issued with consultation letters and feedback was requested:

- 1A, 1B, 1C Bedford Place, WC1B 5AH
- 2A, 2B, 2C Bedford Place, WC1B 5AH
- 3A, 3B, 3C Bedford Place, WC1B 5AH
- Pickwick Hall, 7 Bedford Place, WC1B 5JE
- Thanet Hotel, 8 Bedford Place, WC1B 5JE
- 11A, 11B, 11C, 11D Bedford Place, WC1B 5JA
- Rutland House, 12 Bedford Place, WC1B 5JA
- 13A, 13B, 13C, 13D, 13E Bedford Place, WC1B 5JA
- 14A, 14B, 14C, 14D, 14E Bedford Place, WC1B 5JA
- 15A, 15B, 15C, 15D, 15E Bedford Place, WC1B 5JA
- 16A, 16B, 16C, 16D, 16E Bedford Place, WC1B 5JA
- 17A, 17B, 17C, 17D, 17E Bedford Place, WC1B 5JA
- 18A, 18B, 18C, 18D, 18E Bedford Place, WC1B 5JA
- 19A, 19B, 19C, 19D, 19E Bedford Place, WC1B 5JA
- 20A, 20B, 20C, 20D, 20E Bedford Place, WC1B 5JA

Summary of outcome/main issues raised (include copies of relevant correspondence):

As of the date of this planning submission, no formal response has yet been received from the Ward Councillors.

School/College

Location of site in relation to school/college (include name of school/college): The Mary Ward Centre is situated approximately 95 metres from the application site. CATS College London is situated approximately 235 metres from the application site. Early MBA Programme is situated approximately 230 metres from the application site.
Outline of consultation carried out with school/college (include evidence of consultation): Pre-application consultation letters were issued to the following schools and nurseries: The Mary Ward Centre (AE Centre), 42 - 43 Queen Square, London, WC1N 3AQ CATS College London, 43-45 Bloomsbury Square, London, WC1A 2RA Early MBA Programme, University of London, Bedford Room, Senate House, Malet Street, London, Middlesex, WC1E 7HU
Summary of outcome/main issues raised (include copies of main correspondence): As of the date of this planning submission, no formal response has yet been received from the any of the schools or nurseries listed above.

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation

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 – Full Planning Application		

Developer's Notice

Copy of Developer's Notice enclosed?			No
Date served:	N/A – Full Planning Application		

3. Proposed Development

The proposed site:
This proposal is required to provide continued mobile coverage to the local area, as the existing MBNL site, which is situated on the rooftop of the Imperial Hotel, Russell Square, London, WC1B 5BB is due to be decommissioned and removed. This established telecommunications site currently provides network coverage to the surrounding area and the loss of this site from the network will result in a loss of communications and data services locally and a wider disruption to the mobile network if a replacement site, which replicates the soon-to-be-lost coverage, cannot be identified and integrated into the network at the earliest opportunity. The application site, on the rooftop of the nearby Bedford Hotel, provides an excellent town planning solution and ensures that network coverage will be continuous, replicating the existing installation and the coverage it provides. Additionally, the use of existing buildings for telecommunications sites is supported by National Planning Policy and this proposal will not result in a net increase of telecommunications sites when the installation at the Imperial Hotel is removed. The existing roof level is measured at 25 metres high. This proposal will lead to an increase, in isolated sections, to 31.50 metres. It is considered that the proposal in front of the Council is acceptable, as this height increase will ensure that continuous network coverage for two mobile operators will be provided to the surrounding area and nullify any network impact caused by the decommissioning and removal of the existing installation. This proposal also incorporates a future-proofing element, allowing improved 5G coverage to be provided from this location as the latest advancement in mobile technology is rolled-out across the UK. It is therefore considered that any visual impact caused by this proposal is greatly outweighed by the public benefits of ensuring that the established mobile network coverage is continued.

Type of Structure *(e.g. tower, mast, etc):*	
Description: The installation of 3no rooftop tripod frames accommodating 2no antenna apertures each (6no in total), 2no support poles to accommodate 2no transmission dishes each (4no in total), and 10no equipment cabinets, plus ancillary development thereto.	
Overall Height of proposal:	31.50 Metres
Height of existing building:	24.98 Metres
Equipment Housing:	
Length:	0.60 Metres
Width:	0.64 Metres
Height:	2.10 Metres
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Rooftop tripods – Galvanised Steel
Equipment housing – type of material and external colour:	Steel – Grey (unless otherwise requested by the Local Authority)

Reasons for choice of design, making reference to pre-application responses:

In designing this telecommunications installation, the applicant has sought to achieve a balance between the technical requirements of the Operators and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree.

The application proposes to install specially-designed antenna tripods and pole-mounted transmission dishes on to the rooftop of the Bedford Hotel. This proposed telecommunications site will replace an existing and established site at the Imperial Hotel, Russell Square, which is situated approximately 100 metres to the northwest and is being lost from the network and decommissioned. This installation would provide continuous 2G, 3G, 4G and new 5G coverage for two major mobile operators in this area. This will ensure that the surrounding area will be at the forefront of the next advance in technology being deployed.

The choice of design at the Bedford Hotel is governed by two main factors; the context and visual amenity of the area; and, the technical requirements.

Technical Objective and Technical Requirements

The objective of this site is to ensure coverage to the area is replaced and enhanced, and disruption to the wider network is not caused, due to the proposed decommissioning of a nearby telecommunication site at the Imperial Hotel, Russell Square, London, WC1B 5BB. This existing telecommunications site is being lost from the network for reasons beyond the operator's control – specifically the significant redevelopment plans of the landowner. When any telecommunications site is decommissioned, there is an obvious impact on the network. In order to pre-empt any loss of network coverage, a new site has been identified which offers the best technical solution and not only replicates, but improves, the level of coverage provided by the existing installation. Without a replacement site, there is a two-fold effect – the loss of coverage to the local area; and a greater disruption to the wider network. Each telecommunications site connects to another to create a network. If one network cell is removed, the connection to the adjacent network cells is lost, leading to impacts reaching far further than the immediate consumers.

The proposal has been sited and designed to provide continued coverage to the local area, replacing the existing installation, which is due to be decommissioned, approximately 100 metres away. Should this proposal not proceed, the local area will be left with a coverage hole once the existing installation is removed. This proposal will fill this coverage hole and ensure that there is no down time within the network, or wider implications for the network itself. The need for the proposed installation is henceforth established and justified.

By way of background information, in designing a radio base station it is necessary to incorporate certain vital elements and to work around a number of technical constraints. There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signal(s), the supporting structure that holds the antennas in the air (or fixes them to a building or structure) and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units).

Other elements necessary for the base station to function are the power source (a meter in a cabinet or a generator on sites where a REC supply cannot be utilised), feeder cables that link

the equipment housing to the antennas, link dishes and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

The antenna height is determined by a specialist network radio engineer using specialist software which factors in the area that coverage is required; the relationship between the selected site location and existing cell sites in the linked network; and variances in land levels and elements such as nearby trees or buildings, which can block or weaken signals.

The dishes are located on the rooftop where they can have a clear connection to the core network – ensuring that seamless connection between the cells can be made above the surrounding skyline clutter and any other obstructions.

10no. equipment cabinets are required to house the radio equipment.

Visual Amenity

The applicant gives due regard in designing all new sites to limit the visual impact through good design. In this instance the proposed installation is subject to technical and build constraints. That notwithstanding, it is submitted that the appropriate siting and design put forth will mitigate any potential impact on the site and its surroundings to an acceptable level.

To achieve the required replacement coverage and network improvement for both EE and H3G, 6no. antenna apertures are required. These antenna apertures will be spread between three specially-designed rooftop tripods, with each tripod accommodating two antenna apertures. Two tripods will be positioned to the north of the building, and one tripod to the south, providing 360-degree coverage from the building. As outlined within the application, the rooftop of the Bedford Hotel is proposed to be utilised, as the rooftop is able to accommodate the level of required equipment and offers an excellent town planning solution. The bulk and scale of the proposed equipment has been minimised as far as practicable and it is considered that it will not look incongruous on the existing building. The specially-designed rooftop tripods, which will support the antenna apertures, will also be able to accommodate the ancillary development required to retain and enhance the network services in the area, for both EE and H3G.

The design of the proposed installation is future-proofed to ensure that they will be able to accommodate 5G equipment, ensuring that this area of London will be at the forefront of the next advance in mobile technology being deployed. Furthermore, the height of the antennas is the lowest which would provide the required level of coverage and will only lead to an increase in height of the rooftop in three isolated areas (where the tripods will be positioned), rather than an increase in the height of whole of the rooftop. It is therefore considered that the impact of the proposed development has been kept to an acceptable level, as far as practicable.

Dishes provide a link between base stations within the network. The size and height of the dishes is determined by the location of these surrounding neighbour cells. In this instance, 4no. 600mm dishes are required. The size and number of dishes has been kept to the minimum required for operational efficiency and the associated impact of this addition on the surroundings would be minimal.

Radio signals are generated within radio equipment housing cabinets and 10no. equipment cabinets are required to replace and improve the network coverage. These cabinets will be positioned in a neat arrangement at roof level and will be set back from the edge of the rooftop. Given the height of the rooftop, it is therefore very unlikely that these cabinets will be viewed from ground level and will cause little or no significant harm to the visual amenity of the rooftop.

There is very limited scope to alter the design in order to meet the technical requirements required to replicate the existing network coverage. Nonetheless, it is considered this proposal is appropriate to the site and its surroundings and avoids any unacceptable level of impact. The application site sits within the Bloomsbury Conservation Area. The applicant has taken this into consideration and wishes to proceed with a reduced level of equipment to ensure that any impact on the heritage asset is minimised as far as practicable, whilst also ensuring the technical parameters of the proposal are met and ensuring that the necessary level of mobile coverage is achieved from this location and provided to the local community.

Due consideration has been given to the process and it is considered that the proposal put forward is the best available option – it both achieves the technical requirements and does not bring unacceptable harm to the character of the area.

The accompanying document, titled *'5G and Future Technology'*, provides more detailed information on 5G rooftop installations and the need for antennas to sit above the existing rooftops to ensure there is no 'clipping'. The existing telecommunications site, at the Imperial Hotel, approximately 100m northwest of the application site, has become an accepted part of the built environment over time. It is anticipated that the proposed installation will also become an accepted part of the built environment over time. Whilst it is accepted that the installation will be visible on the rooftop, the design is very similar to the one currently adopted on the rooftop of the Imperial Hotel. The existing design consists of a stub tower on the Imperial Hotel rooftop, measuring approximately 7 metres in height, as well as pole-mounted antennas. This is very similar to the design proposed within this application, albeit on the rooftop of the Bedford Hotel. In fact, it could be argued that the proposed design is preferable in terms of town planning and visual impact, as this design utilises rooftop tripods, rather than a larger stub tower. Essentially, this application proposes the relocation of the existing network cell from the Imperial Hotel rooftop to the Bedford Hotel rooftop, with an almost identical design proposed in both instances. As such, it is considered that the visual impact of both proposals will be similar, and if that is the case, there is no reason why the Imperial House installation should be deemed acceptable, and the proposed design at the Bedford Hotel should be considered anything other than equally acceptable.

The site has been specifically selected to ensure the impact of the development is kept to an acceptable level and minimised as far as practicable, whilst also providing the necessary mobile coverage to ensure that no coverage hole is created once the existing installation is decommissioned. The impact of the development would be outweighed by the significant benefits of the proposal – as is the current situation on the rooftop of the Imperial Hotel.

It is considered, overall, that the design is appropriate to the site and surrounding area and avoids any unacceptable level of impact.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) 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. When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, EE Ltd and H3G UK Ltd operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of EE Ltd's and H3G UK Ltd's network's, the radio base station that is the subject of this application will be configured to operate in this way. 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. 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.	**Yes**	

4. Technical Justification

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

The proposed site is required as a replacement base station, rather than an additional base station, for the area. EE and H3G (known as the operator 'Three') have a radio base station located on the rooftop of the Imperial Hotel which is due to be decommissioned. Consequently, to ensure that network coverage is not lost from the wider area, a new location for a replacement base station has been identified which will satisfy the technical needs of the network and ensure continued provision of mobile services within this area.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV and downloads. The base stations are connected to each other (by cables or wireless technology) to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. There are several variables that determine the size and shape of each cell.

As base stations are low-powered radio transmitters they each have a limited range, meaning that they generally need to be located close to (or within) the target area which requires coverage. If a base station is moved too far away from the target area, then it is likely that some sections of the target area will remain without the network services they previously enjoyed.

When an existing site is lost from the network, as is the case with the scenario, it will result in a very specific "coverage gap" and an alternative site needs to be identified to ensure that this gap is filled. The consequence of not filling this coverage gap is that users of the networks find that the services they previously had access to are either limited or removed.

High-quality communications infrastructure is essential for sustainable economic growth and that high-speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.

The UK Government recognises the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

The Planning Inspectorate too has in recent years continually recognised the importance of this issue and cited it in appeal decisions that have overturned the decisions of local authorities across the UK where there has been a failure to apply due weight to the value of connectivity to social and economic prosperity in the assessment of applications made for telecommunications development, even in protected or sensitive areas. As an example, in October 2018 the decision of Winchester City Council to refuse prior approval for the installation of a 17.5m high monopole and associated equipment housing, required to replace an established site being lost from Vodafone's network, was overturned by the Planning Inspectorate (CTIL and Vodafone Vs Winchester City Council, appeal reference APP/L1765/W/18/31975). Within the decision notice, the Inspector stated that:

"*I attach significant weight to the public benefit arising from the continuation of local service provision…..Having regard to all relevant considerations.. my findings are that the proposal's public*

benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area".

A similar circumstance exists in this case, with the application proposal required to prevent the loss of services on two networks, a matter certainly in the public interest.

Ofcom's Communications Market Report 2018 provides a figure of 92 million active mobile subscribers in the UK at the end of 2017. It details that 78% of adults now use a smartphone and that 76% of mobile users are using their devices for web and data access. Figures within the report also confirm that users are spending an increasing amount of timer per day using their mobile phone. 68% of participants in the Touchpoints research reported that they "could not live without" their mobile phone (rising to 78% among 25-34s). Whilst not included within the research figures, anecdotal evidence suggests that this number is greater still amongst those aged under 18. All of which points towards the nation's increasing dependency on mobile services and connectivity.

As recognised by the London Assembly's Regeneration Committee within its "Digital Connectivity in London" report, published June 2017, digital connectivity is now widely regarded as the "'*fourth utility', an everyday necessity alongside water, gas and electricity*" and also noted that "*mobile broadband is, and will continue to be, an essential complement of fixed broadband*". It is no longer a luxury, but a service essential to modern life.

The loss of services on two major networks, at a time when reliance on connectivity services is a fundamental part of everyday life, is simply unacceptable.

As introduced above in Section 3 of this document, the objective of this site is to ensure coverage to the area is replaced, and disruption to the wider network is not caused, due to the decommissioning of a nearby telecommunications site at the Imperial Hotel.

The installation of this proposal will enable 2G, 3G and 4G services.

2G was the second generation of mobile phone transmission, it introduced data services for mobile, starting with SMS text messages.

3G was an extension to this and enabled the use of data. The main technological difference that distinguishes it from 2G technology is the use of packet-switching rather than circuit-switching for data transmission. Increased data rate to a minimum of 2 Mbit/s for stationary or walking users, and 384 Kbit/s in a moving vehicle.

Similarly, 4G was another extension and enabled an increased speed in connection. It supports a minimum data rate of 1 Gbit/s for stationary and 100 Mbit/s for mobile operation. In simple terms, the benefit to users is that 4G supports mixed data, voice, video and messaging traffic at significantly faster speeds than 3G. This results in ultra-fast internet browsing, video streaming, gaming, e-mail and downloads.

As already outlined within this application, the proposal at the Bedford Hotel will be future-proofed to ensure that 5G services will be provided from this site, in due course.

At a local level, this replacement installation continues to allow for an increase in home working, by providing the opportunity to create a "virtual office", reducing the need to travel for work as a consequence.

It is therefore very important for 'mobile only' households that live and work and any businesses that operate in this part of the LPA's area, together with visitors and others who are staying in or travelling through the area, that the necessary indoor RF coverage is provided to enable them to have satisfactory mobile telephone and internet access.

On a wider scale, the proposal would contribute towards the country's connectivity and digital economy future. Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion, with the next advancement of mobile technology, 5G, available from this installation in due course.

Ofcom's 2018 Communications Market Research Report shows that smartphones are owned by four of every five UK consumers and smart TVs are in almost half of all households. Demand for data continues to grow rapidly for UK consumers, with 1.9GB consumed by an average mobile subscription per month in 2017, (up from 1.3 GB the previous year). The report found that more than seven in ten now use their mobile to access the internet, sufficient coverage is obviously vital for this basic utilities service to be provided.

The UK Government, recognising the benefits to commerce, industry and the public in general, places great emphasis on the benefits of mobile telecommunications to modern life. This position was reinforced by a statement made by then Prime Minister David Cameron in March 2016 when he specifically addressed the vital importance of mobile connectivity for residents and local economies and highlighted that the urgent delivery of the required network improvements is a Government priority;

"*Ten years ago, we were all rather guilty of leading campaigns against masts and all the rest of it. Our constituents now want internet and mobile phone coverage. We need to make sure that we change the law in all the ways necessary, that the wayleaves are granted, that the masts are built, that we increase coverage and that everyone is connected to the information superhighway. This is substantiated in the most recent budget announcement of 16th March 2016, which commits to provisions for "greater freedoms and flexibilities for the deployment of mobile infrastructure*".

Further details of the new 5G technology is included within this application in the form of the 5G and Future Technology document.

5. Site Selection Process

Alternative sites considered and not chosen

Site Type	Site name and address	Reason for not choosing site
Rooftop	Babington Court, London WC1N 3JT	An option was identified at this location. An assessment was undertaken by the Radio Planning Team, who confirmed the viability of the site from a coverage perspective. Additionally, the site is considered suitable from an environmental and town planning perspective. However, it is considered that the application site at the Bedford Hotel is the best planning option available and also offers the best option in terms of replicating and improving upon the existing coverage provided from the Imperial Hotel. This option was therefore discounted in favour of the application site.
Rooftop	National Hospital for Neurology and Neurosurgery, Queen Square, London WC1N 3 BG	An option was identified at this location. However, this building was discounted in preference of the application site as the Bedford Hotel is closer to the existing cell site and will therefore provide better replication of the current mobile coverage. This option was discounted by the Radio Planning Team.
Rooftop	79 Southampton Row, Bloomsbury, London WC1B 4ET.	An option was identified at this location. However, this building was discounted in preference of the application site as the Bedford Hotel is closer to the existing cell site and will therefore provide better replication of the current mobile coverage. This option was discounted by the Radio Planning Team.
Rooftop	103-105 Southampton Row, Bloomsbury, London WC1B 4HH.	An option was identified at this location. However, this building was discounted in preference of the application site as the Bedford Hotel is closer to the existing cell site and will therefore provide better replication of the current mobile coverage. This option was discounted by the Radio Planning Team.
Greenfield	Russell Square and surrounding pavement Bloomsbury, London WC1B 5BG.	An option was identified at this location for a new ground-based mast. However, with the number of alternative options available in the form of possible rooftop installations, it would not be considered appropriate to progress with a new ground-based mast, as per NPPF guidance which encourages a sequential approach to site selection (i.e. existing structures used first, then existing buildings, then a new ground-based mast).
Rooftop	President Hotel 56-60 Guilford St, Bloomsbury, London WC1N 1DB.	An option was identified at this location. Although it is in close proximity to the existing cell site, the Radio Planning Team discounted this option in favour of the proposal at the Bedford Hotel, confirming that the application site better replicates

		and improves upon the current coverage from the Imperial Hotel. Consequently, this option was discounted.
Rooftop	UCL Queen Square Institute of Neurology, Queen Square, London WC1N 3BG.	An option was identified at this location. However, this building was discounted in preference of the application site as the Bedford Hotel is closer to the existing cell site and will therefore provide better replication of the current mobile coverage. This option was discounted by the Radio Planning Team.
Rooftop	33 Queen Square, London WC1N 3BG.	An option was identified at this location. However, this building was discounted in preference of the application site as the Bedford Hotel is closer to the existing cell site and will therefore provide better replication of the current mobile coverage. This option was discounted by the Radio Planning Team.
Rooftop	Royal London Hospital for Integrated Medicine 60 Great Ormond St, London WC1N 3HR.	An option was identified at this location. However, this building was discounted in preference of the application site as the Bedford Hotel is closer to the existing cell site and will therefore provide better replication of the current mobile coverage. This option was discounted by the Radio Planning Team.
Rooftop	Barclay House Great Ormond St, London WC1N 3BH.	An option was identified at this location. However, as the building is smaller in height than the Bedford Hotel, as well as being situated further away from the existing cell site, it would not provide the same level of coverage as a new installation at the application site. This option was discounted by the Radio Planning Team.
Rooftop	Double Tree by Hilton Hotel London – West End, 92 Southampton Row, Bloomsbury, London WC1B 4BH.	An option was identified at this location. However, this building was discounted in preference of the application site as the Bedford Hotel is closer to the existing cell site and will therefore provide better replication of the current mobile coverage. This option was discounted by the Radio Planning Team.
Rooftop	76 Southampton Row, Bloomsbury, London WC1B 4AR.	An option was identified at this location. However, this building is smaller in height than the Bedford Hotel, and therefore would not provide the same level of mobile coverage to the surrounding area. This option was discounted by the Radio Planning Team.
Rooftop	58 Southampton Row, London WC1B 4NB.	An option was identified at this location. However, this building is situated too far away from the existing cell site to successfully replicate the current mobile coverage. This option was therefore discounted by the Radio Planning Team.
Rooftop	Victoria House, 1, Southampton Row, London WC1B 4JB.	An option was identified at this location. Again, this building is situated too far away from the existing cell site to successfully replicate the current mobile

		coverage. This option was therefore discounted by the Radio Planning Team.

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

Whilst there are a number of alternative sites which offer good planning solutions and would replicate the existing network coverage to some extent, it is considered that the best option from both a town planning perspective and a technical perspective is the option brought forward within this application. Consequently, a number of the alternative sites were discounted solely in favour of the application site, which provides all of the criteria that is required when aiming to identify a replacement cell.

As this application focuses on the replacement of an existing telecommunications site which is due to be decommissioned, the search area is particularly restricted as it must ensure current network coverage must be replicated and improved. The proposal on the rooftop of the Bedford Hotel satisfies the technical constraints associated with a replacement cell, but also provides an excellent town planning solution, with only isolated height increases on the rooftop, in the locations of the specially-design tripods. It is also considered that this design may be considered preferable to the existing design of the network cell on the Imperial Hotel. It may certainly be considered that the installation of three rooftop tripods may be deemed more appropriate, from a visual perspective, than the current stub tower and associated pole-mounted antennas on the rooftop of the Imperial Hotel. It is therefore suggested that this proposal will improve the local skyline and reduce any existing impact on views from the Bloomsbury Conservation Area. As such, it is considered that this option far outweighs all alternative sites identified above, as well as the existing network cell.

Additional relevant information (include planning policy and material considerations):

Environmental Information:

There is no evidence of protected species at this location, with the surrounding area consisting of largescale development and buildings. The proposal will subsequently not have any potential negative impacts on any sensitive habitats or species.

As far as practicable the proposed development has been designed to keep to a minimum the impact on amenity and the design of the development ensures there would be only a limited impact which would not be sufficient to harm visual or residential amenity.

Siting and Appearance:

The Code of Best Practice on Mobile Network Development in England emphasises that "*Existing masts, buildings or other structures should be used unless the need for a new site has been justified*", encouraging the use of existing buildings to improve connectivity where possible. In this case, the technical requirement for this replacement cell can be met through utilising an existing building and will be replacing an existing installation that has been earmarked for decommissioning. As the existing cell site is also based on a rooftop, this proposal will result in no net increase in telecommunications sites within the Council area. It is therefore considered, that the siting of the proposal is wholly appropriate.

It is considered that the proposal utilises the most suitable design available to meet the technical requirement within the very specific technical constraints. As discussed in Section 3 of this document, this site is required to replace the existing coverage that will be lost when the site located at the Imperial Hotel, approximately 100m away, is decommissioned.

The antenna apertures have been kept as low in height as possible and will be supported by specially-designed rooftop tripods. This removes the need for a larger and more robust stub tower, which would have a greater visual impact than the design proposed within this application. The height of the antennas will avoid the radio signal being clipped by the roof-edges. The proposed equipment cabinets will be arranged together and neatly at roof level and so will not be readily visible from street level due to their size.

The application site is located within the Bloomsbury Conservation Area designated area. However, it is considered that the proposal will not bring about substantial harm to the character of the area but will bring benefit to the public through retained and improved connectivity and communications services. Whilst the current installation on the rooftop of the Imperial Hotel is not within the Bloomsbury Conservation Area, it is certainly visible from it, and runs along the northern boundary of it. It is therefore argued that, not only is the design of the proposed installation very similar to the existing installation, but also both rooftops are visible from the Conservation Area and are likely to have more-or-less the same impact on the Conservation Area itself. As the existing site on the Imperial Hotel is considered acceptable, then the same should apply to the proposal on the Bedford Hotel.

Both the Imperial Hotel and the Bedford Hotel are in close proximity to a number of Listed Buildings. Given the concentration of Listed Buildings in this area, identifying a site with a suitable separation distance from any Listed Building would be unlikely. Therefore, the aim of this site search was to identify a location which was suitable from a technical perspective, to replicate the existing coverage from the Imperial Hotel, but also provide the more desirable criteria in terms of town planning. It is considered that the proposed development at the application site is unlikely to have any significant impact on either the Bloomsbury Conservation Area, or the nearby Listed Buildings. Additionally, when compared to the existing installation, it is also considered that there will be no further impact on these heritage assets than has already been caused by the installation on the Imperial Hotel. It is therefore expected that this application should receive Officer support.

While the applicants do not suggest that the proposal will have no impact, it is considered that when applying the balancing method advocated in the NPPF, the proposal finds itself in favour – as it did with the existing site on the Imperial Hotel rooftop. It is important to keep the impact of telecommunications development in the area to a minimum and it is considered that the proposed development achieves this. When considering the benefits of the proposal, the public benefit from retained and improved connectivity and wireless communication services is a significant one. Not only will this proposal provide an excellent replacement network cell, but the development will be future-proofed to ensure that this site will provide cutting-edge 5G coverage when it is rolled out across this area of London. The applicant considers that any perceived visual impact on the area, or skyline, has been mitigated, as far as practicable, through the best design available within the technical constraints of the site, and that this development will provide excellent public benefits – both in the present, and in the future.

In this case, it is suggested that the application of the balancing method advocated in the NPPF, for the provision of communications and connectivity services, in the public interest, be utilised to balance the need for continued connectivity with the potential impact of the site. It is considered that when this balance test is applied to the proposal, where the need and significant public benefit is balanced against the appearance and level of associated visual impact of the proposed site, that the application proposal is positively in favour and is considered wholly appropriate.

This has been emphasised by the Planning Inspectorate on a number of appeal cases where, the planning inspectorate has ruled in favour of proposed developments of a similar nature, where this balance was applied. Some recent examples of where this balance was applied by the Planning Inspectorate include appeal cases referenced APP/Q3305/W/18/3206555 and APP/L1765/W/18/3197522. Extracts from these appeal decisions are included below for your convenience:

"*In considering the need for the proposal, Government policy, as set out in the Framework states that advanced, high-quality and reliable communications infrastructure is essential for economic growth and social well-being. In this respect, I have found that there is a need for the proposal which therefore weighs strongly in its favour. As I have found that the level of harm relating to this second main issue would be low, that identified need would outweigh the harm in this case*."

"*I conclude on this issue that despite the less than substantial harm that would be caused, the public benefits of the proposal would outweigh that harm."*

"*9. The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "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… The Council has commented that service provision would be 'adequate' without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision*."

"*13. Having regard to all relevant considerations, including national planning policy and the potential availability of alternative sites, my findings are that the proposal's public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area."*

Whilst each application needs to be assessed on its own merits, the above appeals (along with a growing number of others) indicate a growing trend, based on national policy and guidance, to favour important utilities and infrastructure developments in the wider public interest when the potential harm is outweighed by the important and unavoidable public benefits they provide.

The selected siting is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding harm to the host building and the surrounding area. The antenna apertures will be visible; however, their impact has been mitigated as far as practicable by the proposed design – with height increases isolated to various points on the rooftop, rather than the introduction of one larger installation (in the form of a stub mast) creating a greater visual impact.

On balance, this proposed location is considered to be the optimum location in terms of siting and design, with the limited harm it may impose on the surrounding area being outweighed by the provision of continued and enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact.

Planning Policy Context:

National Planning Policy Framework (2019) (NPPF)

The National Planning Policy Framework came into force in July 2018 replacing the guidance published in March 2012 and was updated in February 2019. The NPPF sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states "*The purpose of the planning system is to contribute to the achievement of sustainable development*", and in paragraph 10 that "*at the heart of the Framework is a presumption in favour of sustainable development*". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

"*a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

For decision-taking (paragraph 11) this means:

"c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Further to this, paragraph 38 states that "*Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area*."

The application proposal would allow the continued provision of reliable mobile communications services to the Camden area of London, which brings about substantial

public benefits both socially as well as potentially allowing for businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the 'virtual office', thus reducing the need to travel and contributing to the sustainability agenda. The loss of these services, where a wholly suitable option is available to prevent it by allowing for provision of replacement infrastructure, goes against the aims of the Government as expressed within the NPPF.

The NPPF directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

"b) infrastructure for transport, ***telecommunications*** *(our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"*

Leading on from this, paragraph 112 states that "*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*". Again, the proposal is entirely consistent with the aims expressed within the NPPF.

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 113 states that "*The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged*". Whilst a new site is proposed within this application, it would replace one being lost from the network, thus the overall number of sites would remain neutral. It should also be noted that this is a rooftop site replacing a rooftop site, which is wholly encouraged within the sequential planning approach to identifying new sites as detailed within the NPPF. This proposal will therefore result in no net increase of telecommunications sites within the Council area, and no increase in ground-based installations – another positive planning outcome to this proposal.

It should be noted that paragraph 116 states that "*Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure*". A certificate of compliance with ICNIRP guidelines is included within this application.

It is stated in Section 4 of this statement that the Planning Inspectorate has in recent years continually recognised the importance of connectivity. When applying the balancing exercise encouraged at paragraph 196 of the NPPF, the Inspectorate has found in multiple cases that the provision, or prevention of loss, to existing services can outweigh less than substantial harm to heritage assets.

In determining one such appeal, brought operator Telefónica (O2) against the decision of the London Borough of Harrow to refuse Prior Approval for the installation of a 12.5 metre high monopole with shrouded antenna section and accompanied by an equipment cabinet on a

roadside verge in the urban area of Harrow-on-the-Hill (appeal reference APP/M5450/W/17/3180345, determined in December 2017), the Inspector concluded that:

"*The proposal would be permitted development and provide public benefits in extending the telecommunications capacity of the area. In applying the balancing test of paragraph 134 of the Framework, I consider that these benefits outweigh the harm that would arise from the proposal's impact on the character and appearance of the Conservation Area*".

These findings were echoed by the Inspectorate in determining a further case brought by the same Appellants against the decision of the London Borough of Hillingdon to refuse planning permission for a 15 metre high monopole with shrouded antenna section and associated equipment housing at a roadside location within the urban area of West Drayton (APP/R5510/W/16/3143922, 2016).

The Inspector concluded:

"*The Framework sets out the importance of an advanced high-quality communications infrastructure for sustainable growth and makes specific reference to the development of high-speed broadband technology. This is reflected in the London Plan and the public benefit arising from the improvement of the telecommunications infrastructure is a material planning consideration that weighs in favour of the proposal.*

Taking account of all matters I have concluded that the limited harm caused to the significance of the heritage asset (the CA) would be outweighed by the public benefit that would arise from improving the communications infrastructure".

In both cases cited the developments were new base station installations proposed within Conservation Areas and it was determined that they would give rise to a degree of harm to the heritage asset in question. Despite this, the importance of providing a quality communications infrastructure was recognised by the Inspectorate and awarded due weight in the determination of the cases brought. That weight was sufficient for both appeals to be successful, despite the recognised harm. In the case of this application, the same public benefit occurs, and it is considered that any harm the designated area (the Bloomsbury Conservation Area) is less than significant and should therefore receive Officer support.

Local Guidance:

Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted development plan for the London borough of Camden Council, relevant to the proposal, comprises:

- The London Plan: Spatial Development Plan for Greater London;
- Camden Local Plan (adopted July 2017).

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

It is considered that the applicants' network is 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 the 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 street-based 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 paragraphs 4.56 and 4.57 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 EE and H3G to provide continued and significantly enhanced coverage to the surrounding area.

<u>Camden Local Plan (adopted July 2017)</u>

There are no policies relating directly to telecommunications development within the Camden Local Plan (2017). General policies of relevance include D1 (Design) which requires a high standard of development, and policy D2 (Heritage). This policy aims to preserve and enhance Camden's heritage assets, including conservation areas and listed buildings. Development within conservation areas is required to preserve or enhance the character or appearance of the area. As discussed within this document, the application site is situated within a designated area (the Bloomsbury Conservation Area), but it is it considered that there will be no significant impact on heritage assets and the proposed development is acceptable. Given the very close proximity of the application site to the existing site (on the rooftop of the Imperial Hotel), and the impacts on heritage assets from the existing base station being considered acceptable, it is argued that a very similar design to that currently in situ at the Imperial Hotel, albeit at the Bedford Hotel, should also be considered acceptable.

As there is no specific telecommunications policy within the Camden Local Plan (2017), then greater weight should be given to the National Planning Policy Framework (2019) (NPPF), which, as outlined above, is largely supportive of telecommunications development.

Conclusion

In summary, the application is in respect of electronic communications apparatus necessary to retain and improve existing public infrastructure networks.

This statement has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact, being appropriately designed and located.

In conclusion, the application merits support and there are no material considerations that indicate otherwise.

Name: (Agent)	Nick Allan	Telephone:	01932 411 011
Operator:	EE Ltd and H3G UK Ltd		
Address:	C/o Agent	Email Address:	Nick.allan@waldontelecom.com
		Date:	30.01.2020
Signed:	*N. Allan*	Company:	Waldon Telecom
Position:	Town Planner	(on behalf of MBNL (EE Ltd and H3G UK Ltd) and above operator)	Waldon Telecom (Agent) Phoenix House Pyrford Road West Byfleet Surrey KT14 6RA