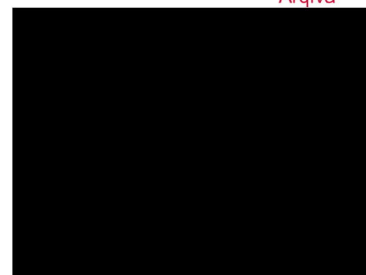




Arqiva



Matthew Dempsey
Development Control
London Borough of Camden Council
Camden Town Hall
London WC1H 8ND

17 February 2020

Dear Mr Dempsey

By Email

Prior Approval Permission 2019/1774/P: Travelodge Covent Garden, 10 Drury Lane, London WC2B 5RE

I write further to the Council's decision in July last year to grant prior approval for the development of an electronic communications base station to be shared by Vodafone Limited and Telefónica UK Limited at this site. As explained further in this letter, we request approval for an amended design using the procedure set out in Conditions A.3(9) and A.3(10) of Part 16 of Schedule 2 to the Town and Country (General Permitted Development) (England) Order 2015, as amended, (the GPDO).

Following a review of technical requirements and structural considerations, we wish to make the following changes to the details of the siting and appearance of the development:

- The repositioning of two antennas from the upper roof level to the main roof level due to structural and operational constraints that prevent them being installed at the approved location. The revised position of these antennas remains faithful to the objective of keeping them away from the roof edge on the north eastern side of the building in order to minimise its visibility from High Holborn and the Seven Dials (Covent Garden) Conservation Area
- The replacement of a 9.5m long stretch of existing 1.1m high handrailing along the north eastern side of the roof with Glass Reinforced Plastic (GRP) handrailing at the same position on the building. This GRP handrailing is required to prevent 'clipping' of the radio signals resulting from the repositioned antennas referred to above
- The installation of the two antennas proposed on the south eastern side of the lower roof on two separate tripods rather than the single tripod originally proposed. This is required to overcome structural constraints by spreading the load bearings of the antennas on this part of the roof
- The two antennas proposed on the south western side of the roof will now be installed on a separate poles, again to spread load bearings, although the position of their support frame remains unchanged



- An increase in the height of some of the antennas to meet ICNIRP compliance considerations. The antennas on the south east side of the roof will be 0.6m higher than the original design and the antennas on the south western side of the roof will be 1.4m higher than originally proposed.

These changes relate to the Vodafone elements of base station and these are illustrated in blue and green shading on the enclosed drawings. For the avoidance of doubt, the layout of the Telefónica apparatus remains unchanged from the approved design and is shown illustrated in light grey on the enclosed drawings to differentiate it from the Vodafone apparatus.

We consider that these changes are minor. Given the height of the building, they will not alter the visual appearance of the development to any significant degree beyond that previously assessed by the Council. Furthermore, the revised design does not introduce any issues that were not previously considered by the Authority when it determined that prior approval was granted for the original proposal.

As such, we consider that these amendments can be agreed by the Council under Conditions A.3(9) and A.3(10) of Part 16 of the GPDO where there is provision for the Authority to agree revisions to the details approved by the original prior approval decision. As explained in Condition A.3(10) these minor variations can be agreed without making a further prior approval application and by a simple exchange of correspondence between us.

The following information is enclosed to assist with the Council's determination of this request:

- Drawing number 78138-00-004-ML007, Rev 7, Location Plan
- The following drawings providing details of the amended design of the development:
 - 200, Revision G, Site Layout Plan
 - 201, Revision C, Equipment Plan
 - 202, Revision G, North East Elevation
 - 203, Revision B, South East Elevation
 - 204, Revision F, Antenna Plan.

May I request a prompt response as to whether the Council is willing to approve the revised details. As explained in the submitted Planning Statement, there is an urgent need for Vodafone and Telefónica to provide coverage from this site following the removal of base station a short distance to the west near Oxford Street following a Notice to Quit direction from the landowner.

I'm sure you'll appreciate that I'm understandably keen to avoid a situation where a response is comparable to the time it would take to submit and determine a further prior approval application.

I trust that the enclosed information is sufficient for you to agree the amendment request, but please contact me if you require any further information or clarification of the proposed changes.

Yours sincerely

[Redacted signature]

Darren Fradgley BA(Hons) DipTP MRTPI

Town Planning Manager

Telecoms – Estates & Infrastructure

[Redacted contact information]

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