

Our ref. 90003/CMN017

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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 SITE, COMPRISING THE REMOVAL AND REPLACEMENT OF 3NO. EXISTING ANTENNAS WITH 3NO. UPGRADED ANTENNAS AFFIXED TO NEW SUPPORT POLES ON THE ROOFTOP, THE INSTALLATION OF 1NO. GPS UNIT LOCATED ON AN ANTENNA SUPPORT POLE AND ANCILLARY DEVELOPMENT THERETO, AT ROYAL NATIONAL HOTEL, BEDFORD WAY, CAMDEN, LONDON, WC1H 0DG (CELL REF:90003) (NGR: E 529960/ N 182219)

We are planning consultants retained by MBNL to submit planning applications on their behalf. This proposal is for the upgrade of the existing H3G (Hutchison 3G UK Limited) site.

Enclosed you will find a Full Planning Application prepared on behalf of H3G. They 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 3No. existing antennas with 3No. upgraded antennas affixed to new support poles on the rooftop, the installation of 1No. GPS unit located on antenna support poles and ancillary development thereto."

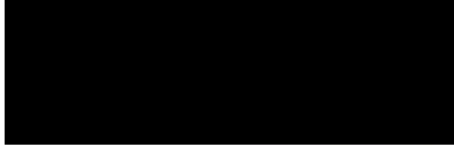
Enclosed is the following:

- Drawings No. CMN017 – 01, 02, 03, 06 – A
- Application forms
- Planning Statement (including design and access statement and heritage statement)
- ICNIRP Certificate

The requisite fee of £462 will be paid via the Planning Portal service.

Should you have any queries regarding this matter, please do not hesitate to contact me, Roland Dahllöf on 0161 956 4155 or roland.dahllöf@avisonyoung.com.

Yours faithfully,



Roland Dahllof
Graduate Surveyor
Avison Young

For and on behalf of H3G UK Limited and EE Limited

Enc. Drawings 90003 – 01, 02, 03, 06 – A1

1.1 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.

1.2. DESIGN

1.2.1. The proposal

The host site is a rooftop site located at Royal National Hotel, Bedford Way, Camden, London, WC1H 0DG. The proposed upgrade comprises the removal and replacement of 3No. existing antennas with 3No. upgraded antennas affixed to new support poles on the rooftop, the installation of 1No. GPS unit located on antenna support poles and ancillary development thereto.

The site is located within the Bloomsbury Conservation Area and although the host building is not listed there are surrounding buildings that are.

Heritage

The Bloomsbury area was initially designated as a conservation area in 1968. The conservation area is located within central London, its southern boundary around 750 metres north of the River Thames. It covers an area of approximately 160 hectares which extends from Lincoln's Inn Fields and High Holborn to Euston Road and from King's Cross Road to Tottenham Court Road.

The Conservation Area is situated midway between the earlier settlements of the City of London and the City of Westminster. The conservation area is located to the northern periphery of the older areas of Soho and Covent Garden, which had been developed during the second half of the 17th century and now are a focus for leisure and entertainment. To the south-east is Finsbury which extends into the financial district of the City. Clerkenwell lies to the east. To the north of the conservation area, the great Victorian railway termini of King's Cross, St Pancras and Euston line the northern side of Euston Road. To the west is Fitzrovia extending to the boundary with Westminster.

The proposal is for the upgrade of an existing telecommunications site located at Royal National Hotel, Bedford Way. The Bloomsbury Conservation Area Appraisal and Management Strategy, adopted April 2011, provides guidance on development in this area. It is demonstrated that the proposal complies with this guidance in section 1.2.4.

1.2.2. Design Considerations

The proposal is for the upgrade of an existing telecommunications site situated on the rooftop of a 32.9 metre high building. The proposed upgrade is for the replacement of 3No. existing antennas with 3No. upgraded antennas. The plans do not propose any additional antennas and it is considered that the proposed design will not look too dissimilar to the existing.

The proposal is for the upgrade of an existing site. By selecting to upgrade an existing site it is considered that the character of the conservation area will be protected by removing the need to source a new telecommunications site within this designation. Utilising existing sites is also within the NPPF of keeping the number of telecommunication sites to a minimum.

The Royal National Hotel is an eight-storey modern building situated within a mixed commercial/retail part of Camden. It is important to upgrade the existing site in this location to ensure that improved coverage and increased capacity is provided to businesses and visitors.

The building is approximately 32.9 metres high. The equipment is mounted on the plantroom which raises the height to 36.2 metres. This increase in height is necessary to avoid clipping so that the site remains ICNIRP compliant. Due to the height of the building and location of the plantroom, to the centre of the main roof, the equipment cannot be seen from ground level.

It is not considered that the proposed works will have a detrimental impact on the host building or 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 site in this area.

1.2.3 Siting

The site is located on the rooftop of Royal National Hotel, Bedford Way. The scheme proposes the least amount of equipment required to ensure increased coverage is provided in this area. It is not considered that the proposal will have a detrimental impact on the host building or conservation area due to the minimal proposed changes and the fact that the equipment is mounted off the plantroom located in the centre of the roof and cannot be seen from street level.

The proposed antennas will be located on support poles located on the plant room roof to ensure that the signal is not affected by the rooftop and to ensure that sufficient levels of coverage are achieved and to ensure that the site is ICNIRP compliant.

1.2.4. 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.

1.2.5. Local Policy

There are no policies directly relating to telecommunications development within the Council's policy documents, though there are some policies within the Camden Local Plan, adopted in 2017 relevant to this application.

Policy D1 Design

The proposal complies with this policy as it has been sensitively designed with the antennas being kept to a minimum height and away from the edges of the roof so that they are not visible from street level. It is therefore considered that the development would preserve the character and appearance of the conservation area and listed buildings in the area.

The proposal is for the upgrade of an existing site. By choosing to upgrade an existing site the character and appearance of the conservation area is protected by removing the need to source a new telecommunications site within this designation.

The proposal is rooftop based therefore policies relating to minimising crime are not relevant and the proposal is not for a security fixture. This statement illustrates why the site has been designed the way it has, and detailed drawings show the proposal. It is therefore considered that the proposal is in compliance with this policy.

Policy D2 Heritage

In relation to this policy, the site is located within a conservation area and is adjacent to listed buildings. However, due to the minimal nature of the works and the fact that the equipment can't be seen from ground level it is considered that the conservation area will not be affected by the proposal.

Policy E1 Economic Development

In relation to this policy, the proposed development will help facilitate an improvement in the telecommunications network. This will allow for increased coverage and capacity which will help support the provision of high speed digital infrastructure in this area.

Bloomsbury Conservation Area Appraisal and Management Strategy

This appraisal as adopted in April 2011 and should be considered in the determination of this application.

The Conservation Area Appraisal does not include Royal National Hotel as a locally listed building or a statutory listed building, therefore permission should not be withheld.

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 proposed upgrade will allow for sufficient level of coverage to be provided within the area by improving capacity, which in turn will allow for better access to mobile technology and will allow the Council to utilise online services

1.2.6 London Plan 2017

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

Paragraph 1.0.8 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 digital connectivity which is of a public benefit to both Londoners and visitors to the area.

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 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.

Policy SI6 – Digital connectivity infrastructure is split into 4 parts. In relation to the proposed upgrade of the site:

- 1) The upgrade of the site will ensure that greater digital connectivity is achieved than set out in Part R1 of the Building Regulations as the site enhances coverage.

- 3) The upgrade of the site will ensure that there will be no reduction in mobile connectivity in the surrounding area as the existing level of coverage will be retained.

The site will be an integral element in securing the Mayor's vision for the delivery of modern communications networks across London.

1.2.7. National Policy

National Planning Policy Framework

This legislation was formally adopted in July 2018, and updated in February 2019, 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

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”.

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, no alternative sites were considered as 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 near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area. An ICNIRP certificate is provided to confirm that the proposal complies with International Guidelines. No alternative sites have been considered as the proposal is for the upgrade of an existing site.

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, the proposal is for the upgrade of an existing site, proposing the least amount of equipment possible to provide sufficient coverage. It is not considered that the proposal will have a detrimental impact on the surrounding communities as the proposal is for the upgrade of an established telecommunications site and will provide enhanced coverage to the surrounding area.

1.2.8 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 H3G & EE, 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 1km 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.

1.2.9 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 as part of this application to confirm that the proposal complies with International Guidelines.

2 CONCLUSION

This is an upgrade of an existing site. The design proposes the least amount of additional equipment necessary to upgrade the site and the visual impact of the proposal will be negligible when viewed from ground level.

The public benefits of improved connectivity outweigh the minimal visual impact on the conservation area. This option has been weighed up against other options that are available, and it is considered that this proposal has the least visual impact on the conservation area, thus preserving the conservation area and surrounding listed buildings.

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