

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

16 November 2021

Submitted via the Planning Portal, ref: PP- 09945401

Dear Sir / Madam

TOWN AND COUNTY PLANNING ACT 1990 (AS AMENDED)
ROYAL FREE HOSPITAL, POND STREET, LONDON, NW3 2QG
PROPOSED TELECOMMUNICATIONS EQUIPMENT

On behalf of our client, DRW (UK) Ltd (the "Applicant"), we submit an application for the installation of telecommunications equipment at the Royal Free Hospital, Pond Street, London NW3 2QG (the "Site").

The following development is proposed:

"Removal of 4x 600mm microwave dishes and installation of 4 x 600mm microwave dishes and equipment at roof level and associated works."

Site Location and Description

The Site is located approximately 130m south of Hampstead Heath Station, in an area comprising a mix of land uses. The Site sits within a predominantly residential area with some small elements of ground floor retail on Pond Street and Fleet Road.

The Site comprises the central part of the Royal Free Hospital, which is the tallest building in the surrounding area, consisting of 15 storeys. The building already hosts telecommunications infrastructure and equipment at roof level.

The building is not listed, however, there are 14 listed buildings within 100m of the Site. The Site is not located in a Conservation Area, however, the FitzJohns Netherhall Conservation is located directly adjacent to the west of the Site, the Mansfield Conservation Area is located directly adjacent to the east of the Site, and both the Parkhill Upper Park Conservation Area and the Belsize Conservation Area are located approximately 150m south of the Site.

The site falls within Flood Zone 1 as indicated by the Environment Agency's Flood Risk Map.

Relevant Planning History

There is recent planning history of relevance published on the London Borough of Camden website. We summarise the relevant history in Figure 1.

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Figure 1: Planning History

Reference No.	Description of Development	Decision
P96/01646	Erection of 2 telecommunications antennae, an equipment cabin and 2 satellite dishes at roof level, as shown on drawing nos. 4268B-M1, S4, D4.	Approved 12/07/1996
2014/7860/P	Installation of 4x telecommunication dishes on roof of building.	Approved 12/03/2015
2015/5463/P	Relocation of 1200mm microwave dish from roof to wall mount, installation of new 800mm wall-mounted microwave dish and installation of new 1800mm roof-mounted microwave dish, all on tower roof of hospital.	Approved 23/12/2015

Proposed Development

This application seeks the removal of two dishes from the eastern side of the roof, and the installation of four dish antennas, all located on the southern side of the roof and associated equipment. This would result in a net-increase of two dishes at roof level.

The height of the dishes proposed aligns with the overall height of the existing telecommunications equipment and does not noticeably protrude above the building, meaning that any visual impact is minimised. The proposed dishes will be attached to the building in a similar manner to the existing infrastructure and will be sited to avoid interfering with the other operators' networks.

The purpose of the proposed dishes is to facilitate the improvement of a private communications network which works on a line-of-sight basis. The height of the building combined with the low surroundings allow the proposed dishes to obtain an unhindered line of sight to the next point in the network. Thus, the building is an ideal location for this development, which is proven by it being an established host of telecommunications equipment.

This proposal is not for equipment that produces electromagnetic fields in the same manner in which mobile phone equipment does. Notwithstanding this, the proposed equipment confirms with the International Commission on Non-Ionising Radiation Protection (ICNIRP) Public Exposure Guidelines and does not pose a risk to human health. Certification to this effect is included in support of this application.

Planning Policy Context

By Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise

National Planning Policy

The National Planning Policy Framework (the "NPPF" / "the Framework") was published on 20 July 2021 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements, as well as previous versions of the NPPF, first published in 2012. The NPPF sets out the Government's approach to planning matters and is a material consideration in the determination of planning applications.

At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11). This means approving development proposals that accord with an up-to-date development plan without delay.

In March 2014, the Government published the National Planning Practice Guidance (NPPG) which is a material consideration in relation to planning applications. The NPPG replaces a number of previous circulars and guidance to provide a simplified single source of guidance at national level. The NPPG was updated in 2019 to reflect the NPPF and is a material consideration in the determination of applications.

Adopted Development Plan

The Site falls within the administrative authority of the London Borough of Hackney ("LBH"), and as such will be considered against the relevant statutory development plan which comprises the following relevant documents:

- London Plan 2021;
- Camden Local Plan 2017;
- Policies Map 2021; and
- Site Allocation Plan 2013.

Site Specific Designations

According to the adopted Policies Map, the Site does not have any site-specific designations.

Assessment of Planning Policy

Below we set out our assessment of the scheme against the policies of the adopted Statutory Development Plan and associated material considerations.

The NPPF is explicit in its support in facilitating high quality communications. Paragraph 114 of the NPPF states that, *"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being"*.

The proposed equipment will enhance a private data network that the applicant operates. The proposed equipment will add reliance to this network, and also improve its efficiency and the ability for the business to operate in a successful manner. Accordingly, the proposals accord with Paragraph 114 by further developing an advanced and high-quality communications network.

Paragraph 115 of the NPPF states that *"the number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum" and the "use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged"*. The proposals accord with Paragraph 115 since they make use of existing buildings (that are already in use for telecommunication purposes) in order to reduce the need for alternative sites that haven't previously been explored.

Paragraph 118 of the NPPF also 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"*.

The proposals are ICNIRP compliant, and certification of this effect is submitted in support of this application.

There are no policies within the London Plan or the Local Plan that refer explicitly to the provision of telecommunications equipment and therefore, the NPPF guidance takes precedence.

In terms of design policies, Local Plan Policy A1 (Managing the impact of development) seeks to ensure that proposals protect the quality of life of occupiers and neighbours. Likewise, Policy D1 seeks to secure high quality design development that respects local character; preserves or enhances the historic environment; is sustainable; preserved strategic and local views; and carefully integrates building services equipment (*inter alia*).

As the site is located adjacent to, and not within, a conservation area, the consideration needs to be had over the potential impact upon the wider setting. The proposals are modest in nature and will not extend above the existing equipment. They are attached to the building in a similar way as the existing and will be read as part of the current installation of telecommunications equipment. The proposal would therefore not result in any negative impact upon the setting of the conservation area. The proposals are very similar to application ref. 2014/7860/P which was recently approved by officers who made no mention to impact on the surrounding Conservation Areas

In addition to the above, the proposal would not result in any material harm to any neighbouring occupiers by the way of loss of light, overshadowing, loss of outlook or noise and disturbance. This was also explored as part of application ref. 2014/7860/P for which officers confirmed:

"The dishes are proposed to be mounted lower than the highest part of the building and will be set against walls to the rear. Given the overall bulk and height of the hospital building itself, it is considered that it would be unlikely to cause further issues in relation to light."

Having regard to the above, the proposals would accord with policies A1 and D1 of the Local Plan, which was also concluded by officers for the previous applications.

Conclusions

The policies of the development plan and material considerations including the NPPF have been considered in the formulation of this proposal. The NPPF is clear that high-quality and high-speed telecommunications equipment is vital to the continued economic success of the country.

The proposal seeks the provision of four dishes at roof level, as well as an equipment cabinet. The proposal is similar to the previous applications.

The proposal does not result in any negative impact on the adjacent conservation area or the amenity of the residential units that form part of or sit adjacent to the Site. This was acknowledged by Camden Officers within the previous applications.

Therefore, since the proposal accords with the policies of the development plan, we respectfully ask that permission is granted without delay to facilitate its delivery.

Administrative Matters

Under the provisions of the Town and Country Planning (Development Management Procedure) (England) Order 2015 a design and access statement is not required for this application.

The application fee of **£234.00** has been calculated in accordance with The Town and Country Planning (Fees for Applications Deemed. Applications, Requests and Site Visits) (England) Regulations 2012 and has been paid via the Planning Portal.

To allow the Council to consider this application, the following plans and information are submitted alongside this supporting statement:

- Site Location Plans (ref. 101 REV 4);
- Existing Site Plan – Roof Level (ref. 102 REV 4);



- Existing Site Elevation (ref. 103 REV 4);
- Proposed Site Plan – Roof Level (ref. 104 REV 4);
- Proposed Site Elevation (ref. 105 REV 4);
- Proposed Site Part Plan / Elevation (ref. 106 REV 4); and
- ICNIRP Certification.

We trust that the enclosed is sufficient for you to be able to register and validate the application. Should you wish to discuss the enclosed in further detail or require any additional information, please do not hesitate to contact Jon Bradburn

[REDACTED] or James Ainsworth [REDACTED]

[REDACTED] at this office.

Yours sincerely,

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MONTAGU EVANS LLP

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