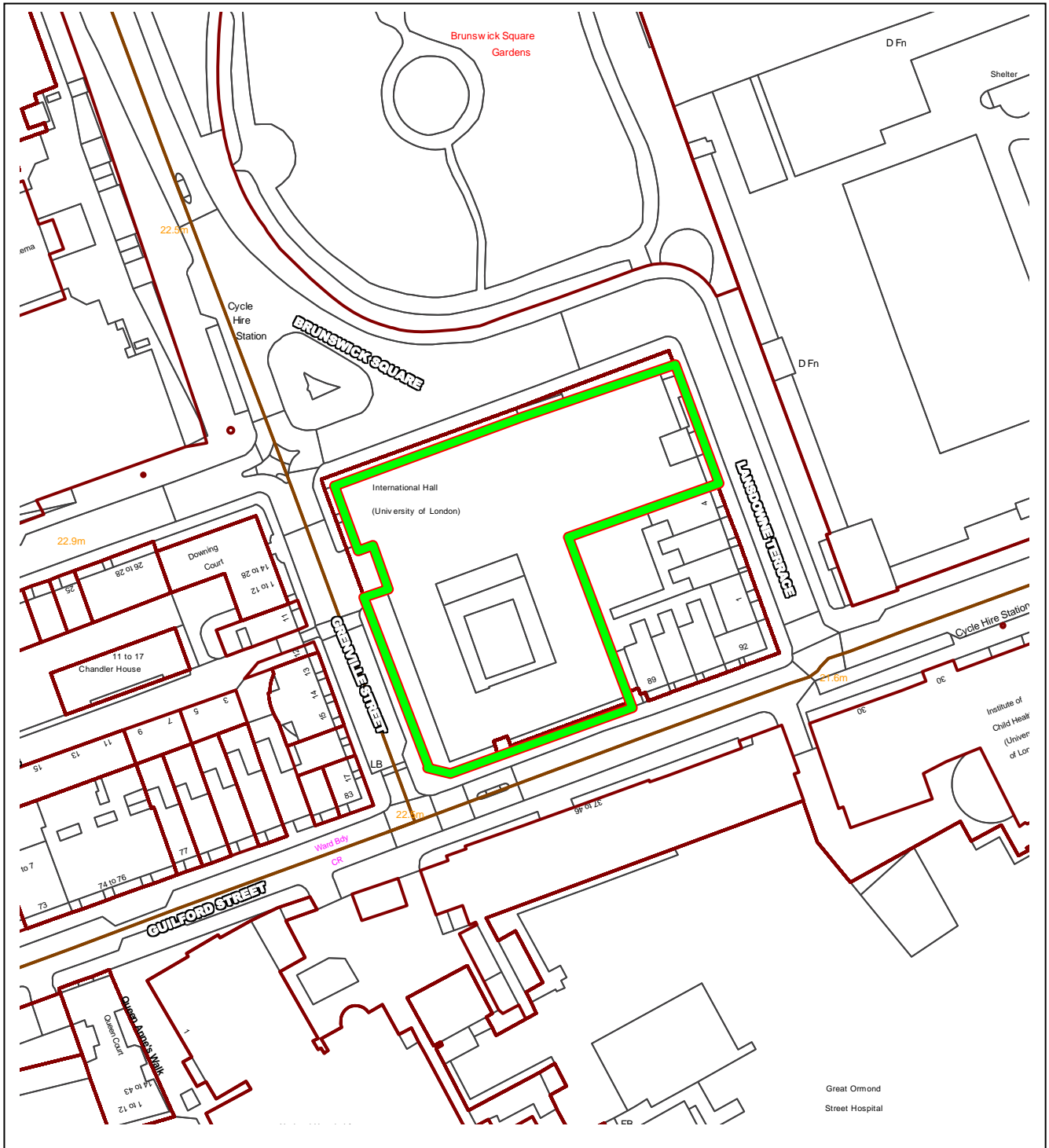


Telecommunications Site 98466/CMN038, International Hall, University of London, WC1N 1AX (2021/3606/P)



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Photo 1 (below): Aerial view of main façade/roof in context



Photo 2 (below): Aerial view of main façade/roof in context of Brunswick Centre

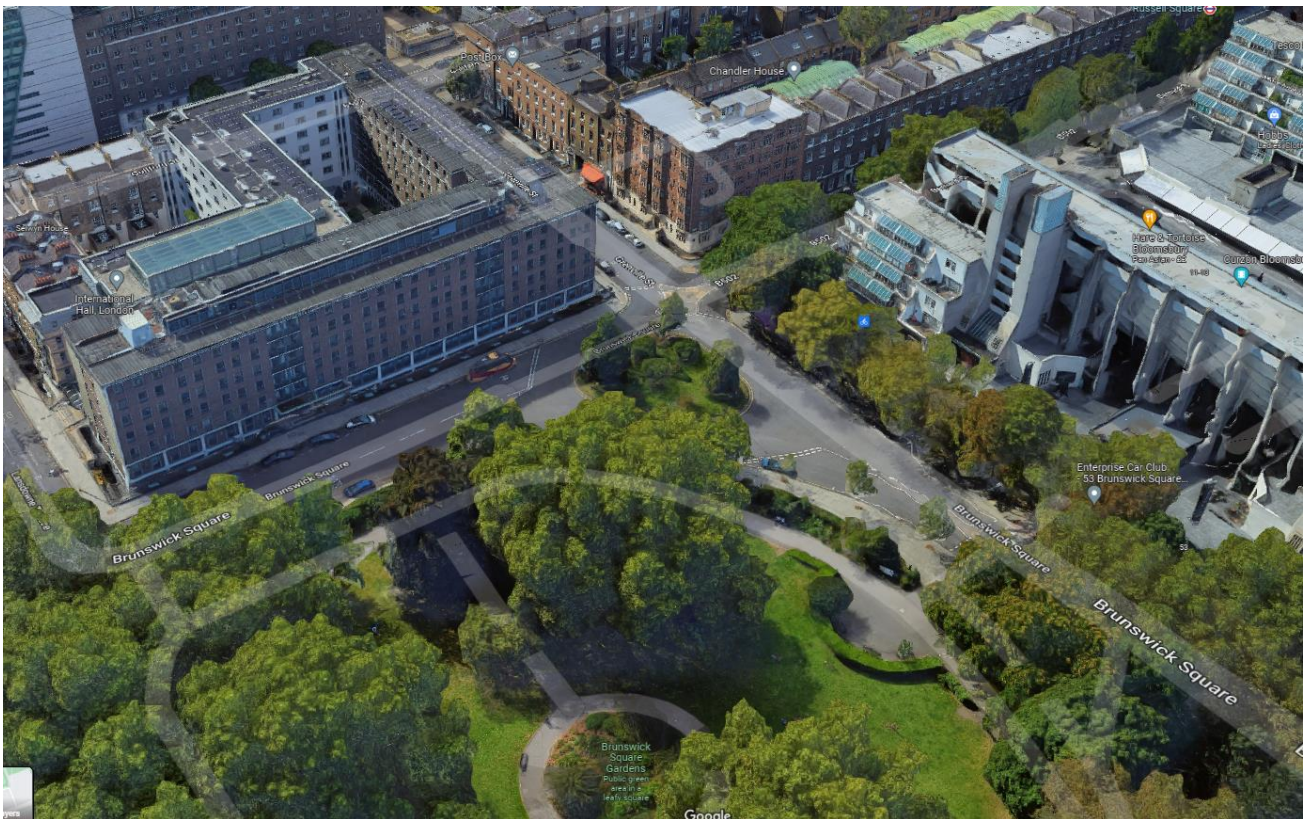


Photo 3 (below): Street perspective from approach from Brunswick Square



Photo 4 (below): Closer street perspective from approach from Brunswick Square



Delegated Report (Members Briefing)		Analysis sheet		Expiry Date:		20/09/2021	
		N/A / attached		Consultation Expiry Date:		28/03/2022	
Officer				Application Number(s)			
Miriam Baptist				2021/3606/P			
Application Address				Drawing Numbers			
Telecommunications Site 98466/CMN038 International Hall University of London Camden Brunswick Square WC1N 1AX				See draft Decision Notice			
PO 3/4		Area Team Signature		C&UD		Authorised Officer Signature	
Proposal(s)							
Proposed telecommunications upgrade to include the replacement of 3 existing antennas with 6 new antennas, installation of 4 x 600mm dishes, upgrade of existing internal equipment and ancillary works.							
Recommendation(s):		Grant conditional planning permission					
Application Type:		Full Planning Permission					

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice					
Informatives:						
Consultations						
Adjoining Occupiers:			No. of responses	01	No. of objections	01
Summary of consultation responses:	<p>A site notice was displayed from 10/09/2021 to 04/10/21, and then multiple site notices were displayed from 03/03/2022 to 28/03/2022. A press notice was displayed from 16/09/2021 to 10/10/2021.</p> <p>University of London objected on the following grounds:</p> <ul style="list-style-type: none"> • Visual clutter in a conservation area • Absence of consultation with residents of Downing Court • Health in terms of safety exclusion zones related to 5G technologies <p>University of London objected to the revised design</p> <ul style="list-style-type: none"> • Safety concern over removal of railing <p><i>Officer response:</i></p> <ul style="list-style-type: none"> • See sections 3.0 (design) and 4.0 (planning balance) below. • Consultation was undertaken on 07/07/2021 by the applicant, letters were sent to the local authority, ward councillors, local MP, nearby schools and nurseries. No responses were received. The council's own public consultation received no response from residents of Downing Court. • See section 5.0 (residential amenity) below. • The railing has been removed but other safety measures will be taken to aid maintenance access when it is required. The applicant has confirmed the roof will only be accessed by qualified maintenance professionals who will take the necessary health and safety requirements, not by the public or any other users of the building. 					
Bloomsbury CAAC comments:	<p>Bloomsbury CAAC objected on the following grounds:</p> <ul style="list-style-type: none"> • Proposed railing to the roof will likely be visible from the public realm and set a precedent in the area for other buildings to do likewise. <p><i>Officer's response:</i> The railing has been removed, see section 1.3 below.</p> <p>Bloomsbury CAAC were asked to comment on the revised design and no further comment was received.</p>					

Site Description

The development relates to the roof of the International Hall (University of London), in particular the north elevation which faces Brunswick Square. The listed Brunswick Centre lies to the north-west of this elevation, the listed surviving forecourt buildings to the former Foundling Hospital, Coram's fields, to the east and listed buildings adjoin the site to the south. The 7 storey building fronts onto Lansdowne Terrace and is used as a student hall of residence. In terms of surrounding views from the public realm, the approach from Brunswick Centre on Brunswick Square is considered the most prominent and significant. The International Hall itself is not listed but lies within the Bloomsbury Conservation Area. Existing telecommunications equipment and plant machinery is located on the rooftop.

Relevant History

Application site:

PS9904674 - Installation of a roof top telecommunications base station- including three antennae, 1 microwave dish, equipment cabin and ancillary rails, as shown by drawing numbers 98466-1 Rev D, 98466-2 Rev A & location plan. **Granted 19/10/1999**

PSX0104402 - Proposed upgrade of telecommunications base station comprising the replacement of the existing 6 No. Half height antennae with 6 No. Half height antennae. As shown on drawing numbers; 1540/JBV-01, 1540/JBV-02. **GPDO Prior Approval Determination 01/05/01 – no objection.**

PSX0005169 - Proposed upgrade of telecommunications base station comprising the replacement of the existing 6 No. Half height antennae with 4 No. Full height antennae, as shown on drawing numbers: 1540/JBV-01-/JBV-04. **GPDO Prior Approval Determination 23/01/01 - no objection.**

2006/1157/P - Installation of 1no. 300mm diameter transmission dish and ancillary equipment to roof of residential institution (Class C2). **Granted 25/04/2006**

2011/2840/P - Replacement of 2 x existing telecommunication antennae, the raising in height of 2 x existing telecommunication antennae and associated ancillary development at roof level. **Granted 02/08/2011**

2014/6289/P - Removal of 3 x telecommunications antennas and replacement with 2 x new antennas, installation of 6 x ancillary remote radio units on new support brackets together with associated ancillary works. **Granted 15/01/2015**

2019/3380/P - Upgrade of existing telecommunications equipment at roof level to facilitate 5G coverage, involving x1 new Antenna mounted on pole fixed to main support pole, x1 new GPS unit installed on Antenna support pole, existing feeders and MHA relocated to new Antenna, relocation of existing x1 RRH, x1 BOB and x1 new RRH mounted on new support pole, relocation of x2 existing RRH and x1 BOB to existing support poles, and existing equipment cabin upgraded internally. **GPDO Prior Approval Determination 22/08/2019 – Prior approval given.**

Relevant policies

National Planning Policy Framework (2021)

The London Plan (2021)

Camden's Local Plan (2017)

- A1 - Managing the impact of development
- D1 - Design
- D2 – Heritage

Supplementary Guidance

- CPG Design (2021)
- CPG Amenity (2021)
- CPG Digital infrastructure (2018)

Bloomsbury Conservation Area Appraisal (2011)

Assessment

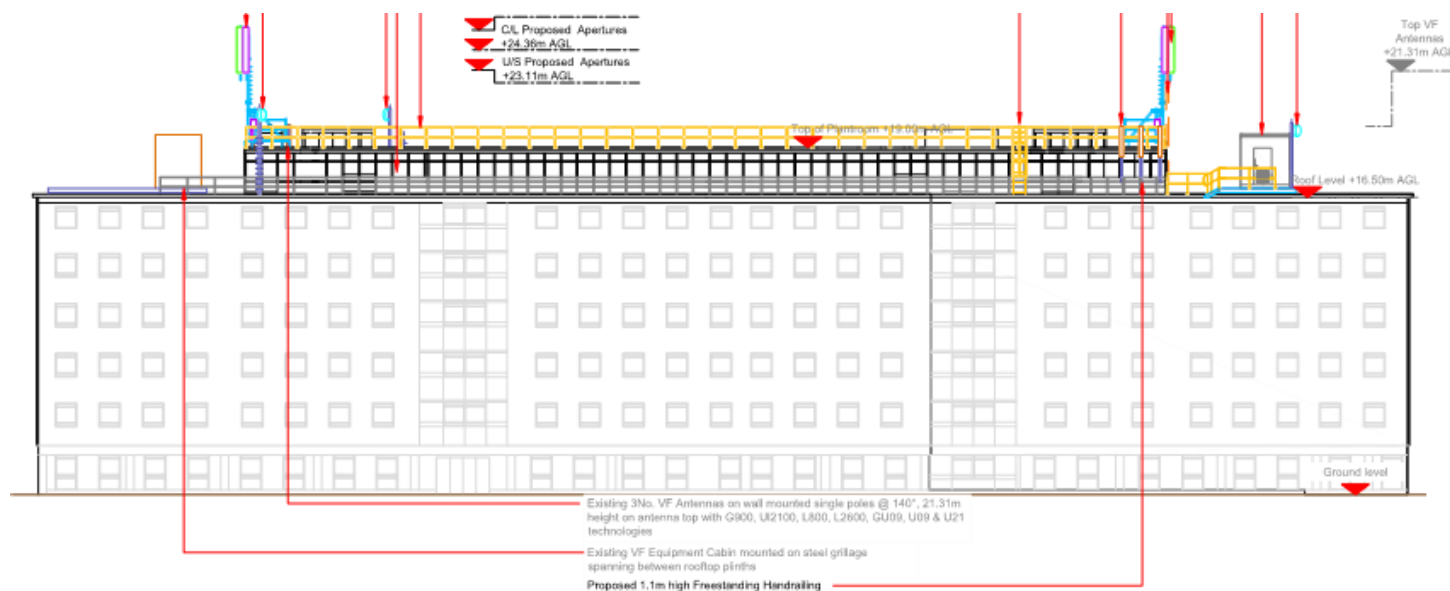
1.0 Proposal

1.1 The scheme seeks to upgrade the existing telecommunication base station in line with present day demands for 5G provision. The proposal is for a telecommunications upgrade to replace 3 existing antennas with 6 new antennas, install 4 x 600mm dishes, upgrade existing internal equipment and ancillary works. The 6 antennas are divided into 3 pairs. There are 4 antennas proposed towards the western end of the rooftop and 2 antennas towards the eastern end.

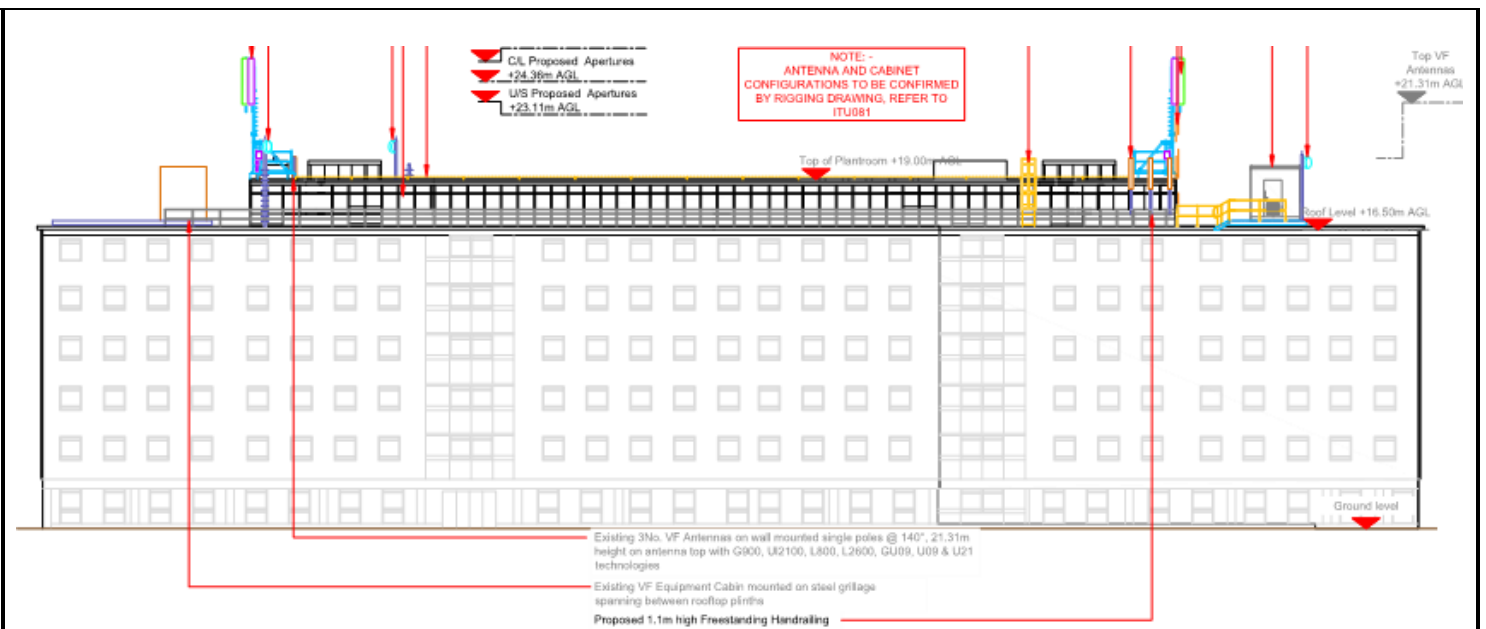
1.2 As existing there are three antennas measuring 3.7m above the roof (1.2m above the plant roof), these are to be replaced by six antennas which will stand 9.2m above the roof (6.6m above the plant roof). At present the tallest feature on the roof is a flagpole 5.8m above the roof (and 3.3m above plant roof) so the proposal is 3.3m higher than this.

1.3 The design has been revised in response to objections by removal of the railing (shown in yellow) to the highest level of the building.

1.3.1 Original proposed elevation:



1.3.2 Revised proposed elevation:



2.0 Assessment

2.1 The main considerations in relation to this proposal are:

- Design
- Planning Balance
- Residential Amenity

3.0 Design

3.1 The Council's design policies are aimed at achieving the highest standard of design in all developments. The following considerations contained within policy D1 are relevant to the application: development should respect local context and character; and should comprise details and materials that are of high quality and complement the local character. Policy D2 'Heritage' states that in order to maintain the character of Camden's conservation areas, the Council will not permit development within conservation area that fails to preserve or enhance the character and appearance of that conservation area.

3.2 CPG Digital Infrastructure states that "the Council will aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need for a new site has been demonstrated to the satisfaction of the Council."

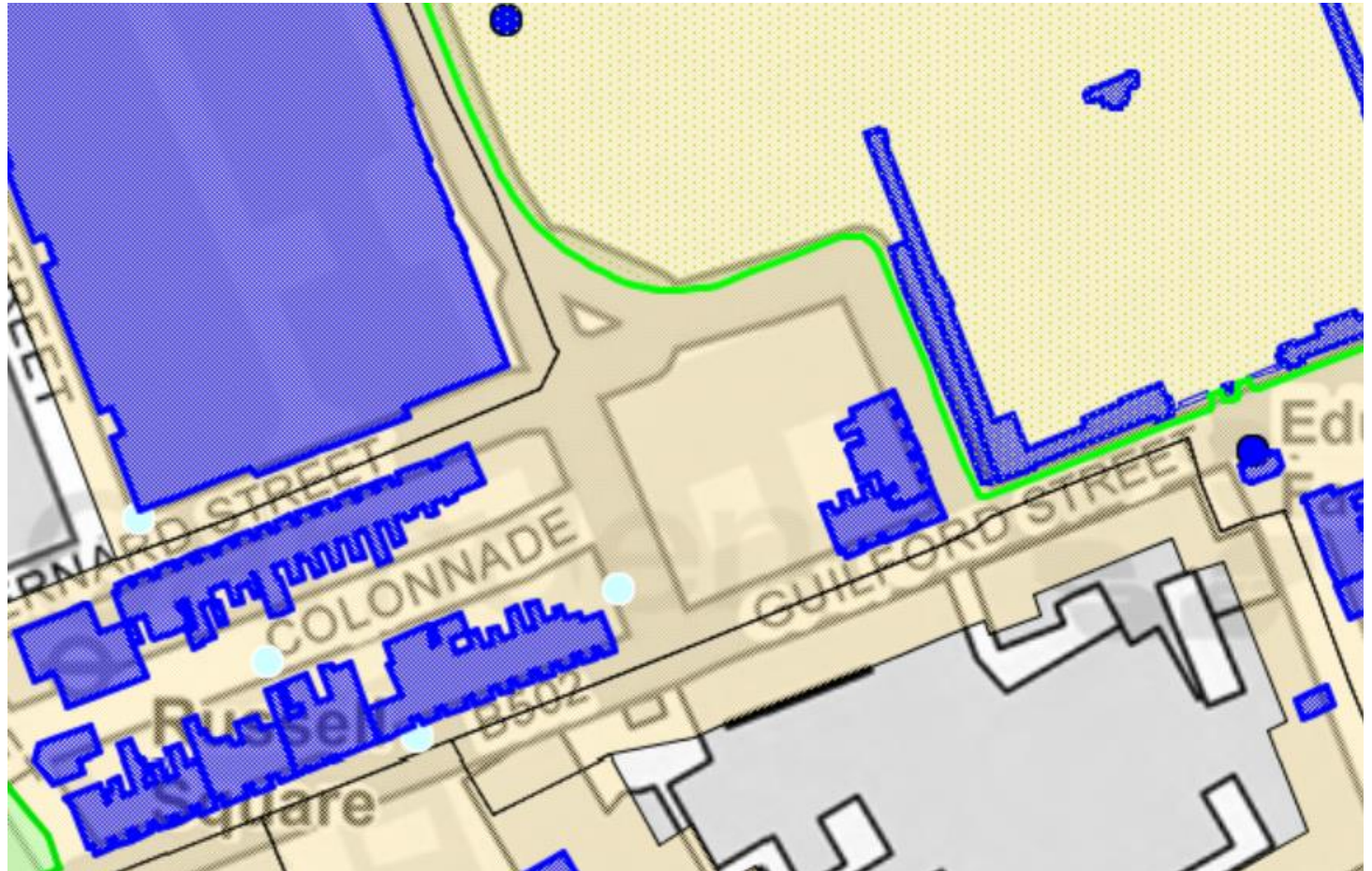
3.3 The NPPF requires Local Planning Authorities to keep the number of radio and electronic communications masts, and the sites for such installations to a minimum, consistent with the needs of consumers, the efficient operation of the network and to provide reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged.

3.4 This application concerns an existing, established telecommunications site, and for this reason sensitive upgrade is encouraged over the proposal of a new site. The proposal includes, among less visible roof additions, 6 new antenna to replace the 3 existing antenna. These would be located in pairs in similar positions to the existing ones on the roof of the plant room, well set back from the edges of the building, but visible in long views from Brunswick Square although somewhat limited by the avenue of trees outside the entrance to the adjacent Brunswick Centre. It is noted that this is the case with the current equipment. The proposed antennas are approximately 5.5m taller than the existing ones. The scheme has been revised in response to objections regarding the originally proposed new continuous stretch of railings along the top of the existing plant room which has now been removed. These railings would have been visible from the public realm and would have

introduced consistent extra bulk and clutter along much of the roofscape. The removal of this railing means the scheme introduces much less visual clutter and is considered to be more sympathetic to the nature of the area and wider conservation area.

3.5 In terms of heritage, and the setting of adjacent listed buildings (Brunswick Centre, Coram Fields and residential terraced properties to the rear on Guildford Street/Lansdowne Terrace), it is considered the negative impact will be less than substantial. The visual impact of a limited number of tall antenna is considered to be relatively narrow.

3.5.1 Nearby listed buildings:



3.6 Screening has not been explored for this proposal at this location as it is considered very likely to add high level bulk and would likely be an incongruous addition on the host building in comparison with the unscreened slim, tall antenna, which are likely to be much less conspicuous from street level. The approach from Brunswick Square (shown in Photos 3 and 4) is a long range view in which additions to the roof are considered most visible, screening is not considered to improve this view or approach but rather to exacerbate clutter at high level.

3.7 Overall, it is considered that there would be additional visual clutter to the appearance of the base station, predominantly in the addition of height to the antennas. This additional rooftop clutter would result in less than substantial harm to the character and appearance of the Bloomsbury Conservation Area.

4.0 Planning Balance

4.1 Considerable importance and weight has been attached to the desirability of preserving or enhancing the character or appearance of Bloomsbury Conservation Area, and the settings of any listed buildings, under sections 72 and 66 of the Planning (Listed Buildings and Conservation Areas Act 1990) as amended by the Enterprise and Regulatory Reform Act (ERR) 2013.

4.2 The NPPF recognises that advanced, high quality and reliable communications infrastructure is

essential for economic growth and social well-being and that services are expected to be upgraded over time to maintain high quality digital infrastructure. Weighing the less than substantial harm caused as a result of the proposed development against this demonstrable public benefit, it is considered on balance that the benefit to the public arising from enhancing the local telecommunication coverage and increased capacity outweighs the limited harm arising to the character and appearance of the host property, Bloomsbury Conservation Area, and settings of the nearby listed buildings.

4.3 Local Plan Policy D1, consistent with Chapter 16 (Conserving and enhancing the historic environment) of the NPPF which seeks to preserve and enhance heritage assets, states that the Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and listed buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

4.4 Given the assessment as outlined above in Section 3 of this report, it is considered that the proposed telecommunications equipment would result in less than substantial harm to the character, appearance and historic interest of the Conservation Area. Taking into account the existing rooftop equipment is already visible from street level and the fact that the most visible equipment, the proposed antennas, would be, although significantly taller, in the same position as existing, the overall harm is considered less than substantial.

4.5 The NPPF states that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

4.6 The proposed upgrade of such equipment is considered a significant public benefit. The supporting information recognises the high level of mobile phone use and ownership within the UK population and the overall acceptance of the benefits of mobile communications. The higher frequencies that the proposed 5G system uses would serve to provide additional public benefits through greater bandwidth and capacity, along with improved connectivity, network enhancement and speed. It is argued that local communities could directly benefit from the proposed new and improved connectivity through enhanced social interaction and inclusion, improved local economy and services, and higher productivity, amongst other benefits.

4.7 It is noted, however, that new 5G systems have a more complex radio requirement. Where previously 2G, 3G or 4G systems could be accommodated without the need for extra supporting structures or raising the antenna heights, 5G signals involve raised antenna heights to avoid the ‘clipping’ effect of building edges given that 5G signals are more prone to the shadowing effect of adjacent buildings or existing structures.

4.8 Weighing the less than substantial harm caused as a result of the proposed development against this demonstrable public benefit, it is considered on balance that the benefit to the public arising from enhancing the local telecommunication coverage and increased capacity outweighs the limited harm arising to the character and appearance of the host property, Bloomsbury Conservation Area, and settings of the nearby listed buildings.

4.9 Overall, therefore, and on balance, the proposed development accords with Chapter 16 of the NPPF which seeks to preserve and enhance heritage assets, and the proposal is considered on balance to be acceptable in design terms.

5.0 Residential Amenity

5.1 Policy A1 seeks to protect the quality of life of occupiers and neighbours by only granting permission to development that would not harm the amenity of residents. This includes factors such as privacy, outlook, natural light levels, artificial light spill, odour and fumes. Due to the nature and location of the proposal it is not likely that any significant harm to neighbouring residential occupiers would result by way of a loss of light or outlook.

5.2 Chapter 10 (Supporting high quality communications) of the NPPF requires that all applications for telecommunications development 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.

5.3 The applicant has confirmed that letters were sent to nearby schools and nurseries on 07/07/2021 and that no responses were received. The site is not located within 3km of an aerodrome or airfield, and as such, the Civil Aviation Authority and Secretary of State have not been notified. The proposal is for erection of equipment on an existing telecommunications base.

5.4 There has been objection to the scheme on the basis of health and radiation from the University of London who occupy the building which hosts the current base, however Environmental Health was consulted on the application and found the scheme to be acceptable. In terms of the submitted information and according to the report of the Independent Expert Group on Mobile Phones (Stewart Report) the balance of evidence to date suggests that exposures to radio frequency radiation below National Radiological Protection Board and International commission on Non-Ionizing Radiation Protection guidelines do not cause a general risk to the health of people living near to base stations. In addition to this the applicant has submitted a statement to the effect that the equipment, when operational, will meet the ICNIRP guidelines and therefore acceptable in environmental health terms. Chapter 10 (Supporting high quality communications) of the NPPF states that local planning authorities must determine applications on planning grounds only and does not give scope for the local planning authority to determine health safeguards beyond compliance with ICNIRP guidelines for public exposure. There is therefore no justification for refusing this application on environmental health grounds.

5.5 Overall, therefore, it is concluded that there would be no adverse impact on residential amenity or public safety issues for any neighbouring residential occupiers in terms of loss of light, outlook or privacy. As such, the proposal accords with the relevant provisions of the NPPF as required, Camden Local Plan Policy A1 and Camden Planning Guidance in this regard.

6.0 Recommendation

6.1 It is therefore recommended, on balance, that planning permission be granted.

The decision to refer an application to Planning Committee lies with the Director of Regeneration and Planning. Following the Members Briefing panel on Monday

4th April 2022, nominated members will advise whether they consider this application should be reported to the Planning Committee. For further information, please go to www.camden.gov.uk and search for 'Members Briefing'.

Application ref: 2021/3606/P
Contact: Miriam Baptist
Tel: 020 7974 8147
Email: Miriam.Baptist@camden.gov.uk
Date: 1 March 2022

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
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Avison Young
3rd & 4th Floor Norfolk House
7 Norfolk Street
Manchester
M2 1DW

DRAFT

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Full Planning Permission Granted

Address:

Telecommunications Site 98466/CMN038 International Hall

University of London

Camden

Brunswick Square

WC1N 1AX

DECISION

Proposal:

Proposed telecommunications upgrade to include the replacement of 3 existing antennas with 6 new antennas, installation of 4 x 600mm dishes, upgrade of existing internal equipment and ancillary works.

Drawing Nos: 002 Site Location Plan Issue F, 100 Existing Site Plan Issue F, Existing Elevation A Issue F, 215 H3a Configuration Site Plan Issue F3, 265 H3a Configuration Elevation Issue F3, Planning Statement & Design and Access Statement, ICNIRP Certificate dated 2021-05-27, 5G and Future Technology - Delivering the UK's Telecoms Future.

The Council has considered your application and decided to grant permission subject to the following condition(s):

Condition(s) and Reason(s):

- 1 The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans: 002 Site Location Plan Issue F, 100 Existing Site Plan Issue F, Existing Elevation A Issue F, 215 H3a Configuration Site Plan Issue F3, 265 H3a Configuration Elevation Issue F3, Planning Statement & Design and Access Statement, ICNIRP Certificate dated 2021-05-27, 5G and Future Technology - Delivering the UK's Telecoms Future.

Reason: For the avoidance of doubt and in the interest of proper planning.

- 3 The colour of the proposed antennas and dishes shall match as closely as possible the background, or the part of the building to which it is attached. All supporting mounts, poles or structures shall be designed to be as unobtrusive as possible, and should be painted the same colour as the antenna.

Reason: In order to minimise the impact on the appearance of the building and local environment in accordance with the requirements of Policies D1 and D2 of the London Borough of Camden Local Plan 2017.

- 4 The apparatus hereby approved shall be removed from the building as soon as reasonably practicable when no longer required.

Reason: In order to minimise the impact on the appearance of the building and local environment in accordance with the requirements of Policies D1 and D2 of the London Borough of Camden Local Plan 2017.

Informative(s):

- 1 Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
- 2 This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.
- 3 All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden.gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)

Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraph 38 of the National Planning Policy Framework 2021.

You can find advice about your rights of appeal at:

<http://www.planningportal.gov.uk/planning/appeals/guidance/guidancecontent>

Yours faithfully

Chief Planning Officer

DRAFT

DECISION