Our ref: 136441_VF
Planning Portal ref: PP-03282567

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27.03.14

Dear Sir or Madam

FULL PLANNING APPLICATION
PROPOSED VODAFONE LIMITED BASE STATION UPGRADE AT 63-66 HATTON GARDEN, LONDON, EC1N 8LE

This is a full planning application, and notice in accordance with the electronic communications code under the Telecommunications Act 1984 Schedule 2 as amended by the Communications Act 2003, for permission for the development of:

Telecommunications development consisting of installing 3no. new antennas (1no. pole mounted, 2no. within replica GRP chimney). Removing 1no. existing equipment cabinet and installing 2no. new equipment cabinets. Installing 3no RRU's (remote radio units) and ancillary development

at

63-66 Hatton Garden, London, EC1N 8LE. NGR E531300 N181926

This application is submitted for and on behalf of Cornerstone Telecommunications Infrastructure Limited (CTIL) and Vodafone Limited

The full planning application comprises:

- The original and 3 copies of the 1APP full planning application forms and applicable certificates;
- The original and 3 copies of the Drawings Ref. No's: 100, 201, 202, 301 and 302 with application site red edged;
- A copy of the 'Ownership Certificate' and covering letter as served on the site owner;
- A planning application fee in the sum of £385.00 made payable to Camden Council;
- Design & Access Statement;
- Site Specific Supplementary Information;
- General Background Information for Telecommunications Development;
- Health and Mobile Phone Base Stations document;
- ICNIRP declaration and clarification statement.

This application has been prepared in accordance with the Code of Best Practice on Mobile Network Development (July 2013).

The enclosed application is identified as the most suitable site option and design that balances operational need with local planning policies and national planning policy guidance.

Furthermore we would like to assist the council and would like to arrange a presentation or meeting with your officers and members to discuss the issues if appropriate.

We are committed to maintaining a positive relationship with all Local Planning Authorities and we would be happy to provide any additional information in relation to this application.

We look forward to receiving your acknowledgement and decision in due course.

Yours faithfully,

Jacquelyn Fee BSc MSc
Mono Consultants Limited

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Mobile: 07500881003
Fax: 028 90 737296
E-mail: jacquelyn.fee@monoconsultants.com

For and on behalf of Cornerstone Telecommunications Infrastructure Limited (CTIL) and Vodafone Limited as a duly authorised agent

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Hatton Garden	Site Address:	63-66 Hatton Garden, London, EC1N 8LE.
NGR:	E531300 N181926		
Site Ref:	136441_VF	Site Type:[1]	Macro

2. Pre Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	**No**
If no explain why: n/a upgrade of existing site		
Was the industry site database checked for suitable sites by the operator:	Yes	**No**
If no explain why: n/a upgrade of existing site		

Annual roll out consultation with LPA

Date of last annual rollout information/submission:	07th October 2013
Name of Contact:	Gavin Polkinghorn
Summary of outcome/Main issues raised:	List of existing sites at that time within the authority.

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	13.03.14	
Was there pre-application contact:	**Yes**	No
Date of pre-application contact:	19.03.14	
Name of contact:	Carlos Martin	
Summary of outcome/Main issues raised: A pre-application consultation email was sent to the LPA on the 13.03.14 detailing the site-specific proposal and the need for the existing telecommunications base station to be upgraded and redeveloped. In an email dated 19.03.14, the LPA advised that there is a charge for providing pre-application advice. Therefore, it was considered that when balancing the fees of the LPA for informal advice, together with those incurred for a formal determination, the proposal subject to this application would be advanced. As the proposal relates to the upgrade of an existing base station and the principle of telecommunication development is established on-site, it was considered appropriate to progress this application and seek the LPA's formal determination.		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	**Green**	Amber	Red
Outline Consultation carried out: A pre-application consultation email was sent to the ward councillors on the 13.03.14 detailing the site-specific proposal and the need for the existing telecommunications base station to be upgraded and redeveloped.			
Summary of outcome/Main issues raised: To date no comments have been received.			

School/College

Location of site in relation to school/college: - In accordance with the Code of Best Practice on Mobile Phone Network Development no schools or colleges were considered to have a direct or functional relationship with the site.
Outline of consultation carried out with school/college: - n/a
Summary of outcome/Main issues raised: - n/a

[1] Macro or Micro

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?	Yes	**No**
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	**No**
Details of response: n/a		

Owner's Notice

Copy of Owner's Notice enclosed?	**Yes**	No
Date served:	27.03.14	

3. Proposed Development

The proposed site:

This application relates to the rooftop of 63-66 Hatton Garden. For reference please see below photographs of the proposed site: -

The existing telecommunications equipment is located on the rooftop of 63-66 Hatton Garden. The main roof level is approximately 26.85m and the upper roof level 30.02m. The site is located within Hatton Garden Conservation Area. The surrounding area is predominantly commercial in nature.

Type of Structure

Description:

This upgrade proposal relates to the removal of 3no. existing antennas and their replacement with 3no. antennas. 1no. antenna will be face mounted and painted to match the existing antenna. The 2no. other antennas will be located within replica GRP chimneys. The upgrade proposal also includes the installation of 3no. RRU (Remote Radio Units).

The scheme also includes the installation of 2no. equipment cabinets on the flat roof of the building. The dimensions of the proposed equipment cabinets are detailed below.

Height of building: -	31.2 metres
Equipment Housing: 2no. RBS 6201 equipment cabinets	
Length:	1.3 metres
Width:	0.7 metres
Height:	1.7 metres
Tower/mast etc – type of material and external colour:	Antennas – 1no. painted to match brickwork. 2no. within replica GRP chimneys
Equipment housing – type of material and external colour:	Coloured green

Reasons for choice of design:

In this instance, the choice of design tabled in this application has been influenced by the existing base station's siting and appearance, the technologies it currently supports, as well as the added emphasis to cater for 4G coverage requirements. It is also acknowledged that the site is found within a Conservation Area. As part of a

sequential approach to site selection, an existing base station development made available as part of the CTIL initiative was identified at this site.

It is of note that the existing building accommodates a number of operators on its roof, in which site-sharing and grouping telecommunications together is advocated in planning policy.

The proposed antennas and their positions on the building offer a technically preferred solution, in which where possible the antennas will be titled and orientated so as to provide cell specific coverage to the demands of the target area. Taking into account the existing arrangement and the character and appearance of the Conservation Area, the extent of redevelopment has been kept to a minimum. In this regard it is considered that the upgrade proposal will appear as unobtrusive feature on the building and will have a negligible visual impact on the streetscape and skyline.

1no. proposed antenna will be pole mounted and painted to match the existing antenna (brickwork effect). 2no. antennas will be located within two replica GRP chimneys.

1no. existing equipment cabinet will be removed and replaced with 2no. new equipment cabinets.

In light of the above it is considered that every effort has been made to limit the visual impact of the upgrade scheme. It is considered that reasonable steps have been taken to achieve this by limiting the extent of development and grouping antennas together, in which the upgrade scheme will have a neutral impact on the host building. Accordingly, it is considered that the proposal when taking into account the siting and design of the existing rooftop base station would have a negligible visual impact on the Conservation Area, thus preserving its character and appearance.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached 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, Vodafone Limited 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 Vodafone Limited's network, 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**	No

4. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

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

In February 2013, the Office of Communications, commonly known as Ofcom, who are the independent regulator and competition authority for the UK's communications industries announced the winners of the 4G mobile spectrum auction. 4G is the fourth generation of mobile phone technology and follows on from 2G and 3G. 2G technologies is predominately used for making calls and sending text messages, whilst 3G enables access to internet services more effectively through a mobile device. 4G services are intended to improve mobile broadband services into the future, enabling greater capacities of data to be shared via mobile technologies with speeds likely to be nearer those currently experienced via home broadband. Vodafone Ltd were awarded 4G licenses, hence they have entered into a new agreement in which the two companies now plan to jointly operate and manage a single network grid across the UK. This initiative strengthens the network infrastructure partnership between the two companies, previously rolled out as part of Cornerstone. This next phase of consolidation will primarily involve upgrading existing base stations to accommodate 4G technology and will be facilitated by Cornerstone Telecommunications Infrastructure Limited (CTIL), a newly formed joint venture company owned equally by Vodafone and Telefónica. The single grid infrastructure will enable both organisations to pool and consolidate their respective networks yet further while running two, independent, nationwide networks.

A retained base station site is required in this location in order to maintain existing network coverage and capacity, as well as catering for 4G network demands for Vodafone.

Further detail regarding the general operation of the Vodafone networks can be found in the enclosed document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the Local Planning Authority in understanding any technical constraints on the location of the proposed development.

The new Code of Best Practice on Mobile Phone Network Development published in July 2013 explains the special operational and technical considerations, which the telecommunications industry encounters. It also details the evolution of mobile networks and discusses the implications of mobile connectivity in the 21st Century. The new Code of Best Practice on Mobile Phone Network Development explains how mobile networks function and the challenges faced in providing sufficient signal, coverage and capacity to supporting customer experiences. It is also of note that the MOA has produced a new guidance document to clarify some of the technical aspects of network development entitled 'Mobile Networks: What They Are and How They Work', August 2013.

5. Site Selection Process

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

Site Type	Site Name & Address	National Grid Reference	Reason for not choosing
n/a	n/a	n/a	n/a

If no alternative site options have been investigated, please explain why:
In accordance with the operators licence obligations, NPPF and the Code of Best Practice on Mobile Phone Network Development, CTIL have reviewed existing telecommunications provision operated by Vodafone in the intended target area. An existing base station has been identified in which taking advantage of the CTIL agreement a sequential approach to site selection has been taken in seeking to upgrade this particular installation. Furthermore it should be acknowledged that alternative sites would have been considered by the operator and determining planning body when this now existing base station was first conceived and established on-site.

Planning Policies

Local Planning Policy

Local Planning Policy

It is recognised that the Planning and Compulsory Purchase Act (2004) established a new system for the preparation of Development Plans. The Core Strategy is the principal document within the Council's Local Development Framework (LDF) and sets their vision, spatial strategy and policies for development in the Authority. The Core Strategy has now been adopted by the Council in which in this regard it is acknowledged that

there is no policy specific to telecommunications development.

National Planning Policy

National Planning Policy Framework (2012)

5 - Supporting high quality communications infrastructure

The National Planning Policy Framework (NPPF) set out Central Government's planning policies for England and how these are expected to be applied. It replaces a number of planning documents including Planning Policy Guidance 8 – Telecommunication. NPPF sets out the Central Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Pertinent to telecommunications development section 5 of NPPF sets out the Governments general overview regarding supporting high quality communications infrastructure and is stated as follows: -

"42. Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.

43. In preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should 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 justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.

44. Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. They should ensure that:

- *they have evidence to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*
- *they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and telecommunications services.*

45. Applications for telecommunications development (including for prior approval under Part 24 of the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- *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 or technical site; and*
- *for an addition to an existing mast or base station, a statement that selfcertifies that the cumulative exposure, when operational, will not exceed International Commission on non-ionising radiation protection guidelines; or*
- *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.*

46. Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure."

In accordance with National Policy the proposal involves upgrading an existing and established telecommunications site. As stated above and as is further explained within the attached "general background" document, the rapid increase in the use of mobile communications and our society's ever increasing dependence upon it has resulted in a direct need for network improvements through the upgrading of existing sites and the deployment of additional base stations in order to address these needs.

The site in question has already been considered to be acceptable for the accommodation of a base station and, although slight aesthetical amendments are proposed including the addition of new apparatus, the colouring and general principle of the established development will remain. Given the accepted nature of the established

apparatus along, it is not considered that this proposal will have anything other than an insignificant impact upon the character of the site and local amenity.

A sequential approach to site selection has been taken. In this instance the operators' have identified an existing street furniture site that currently accommodates Vodafone and that can be upgraded with only minimal works so as to address this requirement.

The proposal is to install 3no. new antennas, one face pole mounted and 2no. within replica GRP chimeys. These minor alterations are not considered to have a negative impact on the general aesthetic of the established site. Nor is it considered that they would be of such detriment to local amenity or the skyline so as to merit a refusal.

The operators are committed to ensuring that the amount and dimensions of all newly proposed apparatus be limited to a minimum operational requirement so as to minimise potential impact. Furthermore the additional cabinets are required to service the updated antenna types. Without the new antennas and additional cabinet elements, the site will not be able to address the current technical requirement. The operators are committed to employing means of disguising their apparatus when seeking to address coverage requirements in sensitive locations and restrictive planning policy designations. The 1no. pole mounted antennas will be painted to match the existing brickwork and the other 2no. antennas will be located within replica GRP chimneys.

It is acknowledged that the site sits within Hatton Garden Conservation Area. The equipment has been sensitively designed in order to incorporate into the surrounding environment. Due to the minor nature of the works proposed it is considered that the proposal will not have a detrimental impact on the character and appearance of the Conservation Area.

Code of Best Practice on Mobile Phone Network Development (2013)
A new English Code of Best Practice on Mobile Network Development has replaced the original guidance note that was first published in 2002. Since the previous version, there have been significant changes in planning policy with NPPF replacing PPG8, in technology and infrastructure rollout via consolidation agreements. The new Code of Best Practice is now more reflective of today's current practices, in which it is intended to be kept under review and will be updated every 18 months to take onboard any matters arising. The planning process and tools in the new Code of Best Practice remains much the same as previous in which the following is considered relevant in this particular case: -

In Appendix B discusses the general principles for telecommunications development. It is stated that "*The Government's general policy on telecommunications development is to facilitate the growth of efficient and effective telecommunication systems whilst keeping the environmental impact of such development to a minimum. The siting and design of telecommunications equipment, if undertaken with care and sensitivity, will be vital in achieving this policy aim. Good siting and design should not only be respected in environmentally sensitive areas but should also be applied to all telecommunications development. In all circumstances, the sensitivity to context of the proposed development should be considered.*

In particular, the following general design principles should be regarded as important considerations in respect of telecommunications development:

- *Proper assessment of the character of the area concerned*
- *Design should be holistic and three dimensional showing an appreciation of context;*
- *Analysis of the near and far views of the proposal and to what extent these will be experienced by the public and any residents;*
- *Proposals should respect views in relation to existing landmarks and distant vistas;*
- *Proposals should seek to consider the skyline and any roofscapes visible from streets and spaces;*
- *Choice of suitable designs, materials, finishes and colours to produce a harmonious development and to minimise contrast between equipment and its surroundings.*

The options for the design used by an operator will be affected by site conditions, technical constraints, landscape features and coverage and capacity requirements. The main options would include:

- *Mast and/or site sharing;*
- *Installation on existing buildings and structures;*
- *Camouflaging or disguising equipment where appropriate;*
- *Using small scale equipment;*
- *Erecting new ground based masts.*

It is recognised in the Code of Best Practice that mast and site sharing is a longstanding Government policy objective. In this regard the Government encourages telecommunications operators, wherever viable, to share masts and sites as a means of minimising overall mast numbers. It is stated in Appendix B that *"If operators are*

able to share sites, and install more equipment on each site, this reduces the overall visual impact of network infrastructure, because even though shared sites will tend to be slightly bigger, it means that fewer sites are needed to improve coverage and capacity, infrastructure becomes more feasible, and is more cost-effective to deploy. In fact, sharing of sites is now the norm, and network operators now share much of their network infrastructure via joint venture commercial arrangements."

With regards sympathetic design and camouflaging the Code of Best Practice recognises that operators have made great strides in developing their designs. Indeed in Appendix B regarding such matters it is stated that *"This can be seen in the newer, more modern masts which are frequently able to blend into their surroundings far more effectively in contrast to some of the older, larger masts that were first built over 25 years ago."* The Code of Best Practice goes on to acknowledge the use of colours in disguising equipment and this practice should be encouraged to continue wherever appropriate.

Planning Assessment

From the outset, it should be appreciated that irrespective of the installation's use as a telecommunications base station and its siting within a Conservation Area, the change in its form will always be, to some degree, a noticeable alteration to those residents and regular passers by found closest. However it should be recognised that visibility does not automatically result in an overwhelming adverse harm. Similarly, it should be acknowledged that the presence of the existing telecommunications installation on-site may result in a number of preconceptions regarding the new proposal now subject to this application. In reflection it should be appreciated that these opinions may actually derive from the previous planning history and or the siting and appearance relating to the now existing rooftop base station. Irrespective of these viewpoints and what has gone before it should be acknowledged that the existing base station is now established on-site, in which this provides a good reference point for the latest scheme.

In light of the above it is evident that a planning assessment of this case should concentrate on whether the proposed changes in terms of its form when compared to the existing development are significant as to outweigh any other material planning considerations. Indeed it should be ascertained as to whether there is still a need for the rooftop base station and if there have been any notable changes in terms of the development's surrounding context. Also the upgrade proposal subject to this application should be reviewed against the up to date planning policy regarding telecommunications development.

As discussed previously with regards the choice of design, it is considered that the upgrade development will not undermine the visual amenity of the host building or its wider area. In this respect and when balanced against other material matters, it is considered that the proposal subject to this application is acceptable.

With regards the need for the development it has been highlighted previously that the existing base station requires upgrading to meet the existing and future 4G demands of mobile users. In this respect it's continue presence and operation is essential in providing network coverage for Vodafone.

It should be acknowledged that a sequential approach to site selection has been taken, whereby an existing base station found on the roof of a tall building has been progressed. The surrounding context to the host building remains largely unaltered, in which it is considered that the upgrade scheme would not appear unduly prominent when seen in this environment. It is considered that the upgrade proposal will have a negligible impact on the street scene and skyline, whereby any visual impact would not outweigh the continued need and future 4G demands to provide coverage.

It is recognised that the existing telecommunication development was determined prior to the adoption of NPPF. Similarly it acknowledged that Local Planning Authorities are in the process of formulating Core Strategies, in which many telecommunications specific polices have been saved or have been deleted in favour of a more general design policy. Nevertheless it is evident that the planning policy context has not altered significantly since permission was initially granted, in which the key principals of telecommunication development are deep rooted in planning policy. In this regard it is reasonable to presume that the NPPF, which is now of primary importance has derived from PPG8 which was applied in the first instance. Furthermore it is of note that the new Code of Best Practice takes on board current practices in which this case seeks to follow. Therefore it is considered that there is limited material conflict between the latest adopted planning policies used today when compared to the policy context that has gone before. Taking into account the local planning policies which are now applicable, it is considered that the upgrade proposal accords with the Council development plan.

In light of the above the applicant considers that the rooftop proposal strikes a good balance between environmental impact and operational considerations.

Health & Safety

Court cases have confirmed that the public perception of health risks can be a material consideration within the land-use planning system. However the weight to be attached to this issue has to be determined accordingly in

each case by the decision maker. It has been generally held, and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been demonstrated that the proposed installation will comply with the ICNIRP guidelines.

It should be recognised that it has been long since established that it is Central Government's stance that the planning system is not the appropriate mechanism for determining health safeguards. It remains Central Government's responsibility to decide what measures are necessary to protect public health. Most notably it is Central Government's view that if a proposed development meets the ICNIRP guidelines for public exposure it should not be necessary for a Local Planning Authority, in processing an application for planning permission or prior approval, to consider further the health aspects and concerns about them.

In this respect the operators believe that it is not necessary to consider health effects further. Vodafone is committed to ensuring that all new installations are ICNIRP compliant therefore it is considered that there is no basis for this case to be refused on health and safety grounds or for reasons relating to public concerns about health and safety. An ICNIRP compliance certificate is attached as part of this submission, as required by NPPF paragraph 45, in which the ICNIRP declaration takes into account the cumulative effect of the emissions from the proposed installation and all radio base stations present, at or co-located near to the proposed installation. Radio frequency emissions from the proposed installation will be may times lower than the ICNIRP reference standard in all publicly accessible areas around the installation. In the light of the above information, it is clear that the weight to be given to such concerns should not be so great as to warrant a refusal of the case on health grounds.

Contact Details

Name: (Agent)	Mono Consultants Limited	Telephone:	028 90 737297
Operator:	Vodafone Limited	Fax no:	028 90 737296
Address:	The Mount 2 Woodstock Link Belfast BT6 8DD	Email Address:	jacquelyn.fee@monoconsultants.com
Signed:	 *Mono Consultants Limited* (on behalf of CTIL and the above operator)	Date:	27.03.14

DESIGN AND ACCESS STATEMENT

This Design and Access Statement is provided in conjunction with the Supplementary Information Template, drawings and supporting material that was submitted with this planning application.

This statement is submitted pursuant to Article 4C of the Town and Country Planning (General Development Procedure) Order 1995 (as amended) and Regulation of 3A of the Planning (Listed Buildings and Conservation Areas) Regulations 1990 (as amended).

In accordance with the Code of Best Practice on Mobile Phone Network Development and published Government guidance, this proposal was drawn up having regard to the need for good design.

In particular:

- Considerations of design and layout are informed by the context, having regard not just to any immediate neighbouring buildings but the townscape and landscape of the wider locality. The local pattern of streets and spaces, building traditions, materials and ecology all help to determine the character and identity of the development.
- The scale, massing and height of proposed development have been considered in relation to that of adjoining buildings; the topography, the general pattern of heights in the area; and views, vistas and landmarks.

The following general design principles have been taken into account in respect of this proposed telecommunications development:

- A proper assessment of the character of the area concerned.
- That the design shows an appreciation of context;

SITE CONDITIONS, TECHNICAL CONSTRAINTS, LANDSCAPE FEATURES AND CAPACITY REQUIREMENTS

Introduction

It needs to be borne in mind that the proposed development is for a mobile telecommunications installation. Hence, access is deliberately restricted, where appropriate, for the security of the installation.

Pre Application Discussions and Negotiations

A pre-application letter of consultation was sent to the Local Planning Authority seeking their views on the operator's aspirations to upgrade a number of existing base stations within the authority.

To date no comments have been received.

In light of the above when balanced against the nature of the upgrade development and matters which would be considered by the LPA in the planning process, it was considered appropriate to progress this application and seek their formal determination.

Documentation Submitted with Application

- Drawings Ref. No's: 100, 201, 202, 301 and 302 with application site red edged;
- Site Specific Supplementary Information;
- General Background Information for Telecommunications Development;
- Health and Mobile Phone Base Stations document;
- ICNIRP declaration and clarification statement.

Design Component

<u>Use proposed</u>

- The proposed development will consist of the upgrade of the existing base station that will provide coverage for Vodafone.
- The proposal will offer improved services and capabilities to the local community, creating better connections that will have social and economic benefits for the area.
- Commercially companies of all sizes, from sole traders to multi-nationals will benefit from improved business efficiency that mobile communications bring. The added security for travellers is a benefit many people will recognise and most families have come to rely on the convenience and reassurance of instant mobile communications.

Amount

- The installation of 3no. new antennas;
- The installation of 3no. RRUs;
- The installation of 2no. equipment cabinets;

Layout

- The proposal takes a same layout to the existing rooftop installation

Scale

- The scale of the proposed development is relative to the height of the building, in which the antennas are mounted on the roof at 27 metres and 30 metres;

Landscaping

- The proposed development is found on the roof of the building, in which in this respect there is no landscaping proposed as part of this application.

Appearance

- 1no. antenna will be pole mounted and painted to match the existing brickwork. The other 2no. antennas will be located within replica GRP chimneys;

Access

Given the siting of the proposal on the roof of a tall building, the site will only be accessed by those personnel associated with the applicant. In light of the siting of the antennas on a building and the intended use to provide mobile phone coverage, the public should have no interest or need to access the base station. Therefore it should be recognised that access to the proposal is set well away from recognised public rights of way and is remote from recognised pedestrian and vehicular movements within the public realm.

The applicant will make use of on-site and existing internal routes during construction. It is likely that once built, the site will be visited infrequently for maintenance purposes only. Right of entry to the site will be primarily by foot in which the applicant will make use of on-site and internal access arrangements so as to gain access to the antennas and ancillary equipment. In the event of the antennas that form part of the scheme needing to be maintained this will be achieved by rooftop access or if feasible the siting of a ground based cherry picker with a hydraulic platform alongside the building.

Community Safety

The radio base station will be operated in accordance with the radio frequency or electromagnetic field exposure guidelines suggested in the European Union (EU) Council Recommendation of 12th July 1999.

This recommendation is based on the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines for limiting public exposure to electromagnetic fields. This means that in areas where the general public may spend time, exposure levels will be fully within guidelines which the UK Government and the European Union have recommended and has formal backing of the World Health Organisation.

A declaration of ICNIRP compliance is provided as part of this planning submission.

General Background Information for Telecommunications Development

This document is designed to provide general background information on the development of the Telefónica and Vodafone networks. It has been prepared for inclusion with planning applications and supports network development proposals with generic information regarding;-

1. Introduction
2. Digital networks
3. Site selection process
4. Planning policy guidance
5. Site or mast sharing
6. Councils
7. Consultation with schools
8. Legal cases
9. Further information

Note - All references in this document refer to England only.

1.0 INTRODUCTION

Over 25 years ago under the Telecommunications Act 1984, a licence was granted to Telefónica and Vodafone to provide wireless (or mobile) phone services utilising unused radio frequencies adjacent to those transmitted for over 50 years by the television industry. Initially because this wireless technology was new and the number of potential customers unknown, a number of tall masts were used to provide basic radio coverage to the main populated areas. The design strategy used was similar to that used by local radio/television i.e. tall masts to cover large distances over all types of topography.

It is important to note that in recent years form has followed function and digital technology has resulted in the development of smaller equipment. In addition, smaller radio coverage areas have resulted in antenna/mast heights being generally reduced. The industry has also been able to develop low impact designs for use in sensitive planning areas such as in Conservation Areas, on Listed Buildings, and in National Parks etc. The wireless telegraph pole solution is just one example of a design which has minimised impact on visual amenity of the local neighbourhood.

2.0 DIGITAL NETWORKS – "2G/3G" OR SECOND/THIRD GENERATION

The Telefónica and Vodafone 2G digital networks were developed in the early 1990s. This digital technology is often referred to as GSM (Global System for Mobile Communications) which is the common European operating standard enabling phones to inter-connect to other networks throughout Europe and Internationally. In April 2000, Telefónica and Vodafone were successful in their bids for two of the five licences available to provide a 'Third Generation' mobile telecommunications service known as '3G' or UMTS.

In addition to voice services, this technology enables Telefónica and Vodafone to offer high resolution video and multi-media applications. Among other things this enables office services, virtual banking, e-retailing, video conferencing and high quality broadband internet access to be provided to users on the move. This is all made possible by higher rates of data transfer allowing wireless broadband access to the Internet for mobile phones and laptop computer data card users.

The 3G radio base station is designed to provide a service via cells in a similar way as the GSM (2G) system but with a few differences. Due to the increased data transfer, the location of 3G base station sites is even more critical. Base stations must be located where the local demand exists in order to provide the required levels of service, otherwise the network will not function.

Telefónica and Vodafone will ensure they comply with planning policy guidance by ensuring apparatus be installed on existing buildings and structures, including masts wherever possible. However, in spite of these efforts, there are likely to be instances where there is a need to install additional base stations to provide contiguous service. This is largely due to the characteristics of radio propagation at this frequency, demands on the service and the high data transfer rates.

It is very important to note that mobiles can only work with a network of base stations in place where people want to use their phones (or other wireless devices). Without base stations, the mobile phones we rely on simply won't work.

2.1 How the cellular radio network works

The building blocks of the mobile telecommunications network are called radio base stations which transmit and receive calls to and from mobile phones using radio waves, similar to those used in domestic television and radio equipment. Radio base stations are often associated with free-standing masts, however they can be located on,

or even inside, existing buildings and other structures. Telefónica and Vodafone use “radio frequencies” to transmit and receive calls at 900 MHz or 1800 MHz for 2G whilst 3G uses slightly higher frequencies within the 2100 MHz range.

2.2 How radio signals are transmitted

The radio signals are transmitted from antennas which are part of the radio base station and cover an area known as a “cell”, hence the term “cellular phone”. The size of the cell is dependent on a number of factors including: the height at which the radio base station is positioned; the topography of the surrounding landscape; anticipated demand; and the population density in the area.

Radio signal transmission from a radio base station can be likened to water being distributed from a garden sprinkler. The area immediately adjacent to the sprinkler remains almost “dry”. However the grass gets progressively wetter moving further away from the sprinkler, until a wettest point is reached. Then the further away from the centre, the ground becomes progressively drier. Radio base stations provide network services in a similar manner. The area immediately beneath the antennas receives limited or, occasionally, no signal. Moving further away, the signal steadily improves until it reaches an optimum level and then gets progressively weaker.

In order to use mobile phones whenever and wherever we are, a network of radio base stations is required to maintain a continuous signal or ‘network service’ across a geographical area. The network is designed so that the cells from each radio base station slightly overlap. Travelling even a short distance may take us through a number of cell areas. Mobile phones are designed to monitor the strength of signal from surrounding radio base stations and automatically select the clearest signal, which often comes from the nearest site. As you approach the edge of the cell area, the phone will automatically select the adjoining radio base station, to provide a continuous service. This process is known as ‘call handover’.

2.3 Factors affecting network services

The siting of a radio base station is largely dependent on the characteristics of the radio signals which they transmit. Physical features such as buildings or landscape can obstruct the signals. In open rural areas one base station can typically cover several kilometres in radius. However in urban areas where surrounding buildings will obstruct the signal, this range can be reduced to as little as a few hundred metres.

2.4 Network Capacity

Radio base station sites can only receive and transmit a limited number of simultaneous calls to and from mobile phones. In areas where the use of phones is particularly high, such as major towns or cities, many sites will reach the maximum number of calls they can process. When a customer attempts to make a call in an area where the network has reached its full capacity, the ‘network busy’ message is displayed on their mobile phone. In order to continue to meet customer demand and improve the quality of services in these areas, there is a need to increase the capacity of the network to allow more calls to be made.

2.5 Technical Requirements

Telefónica and Vodafone radio engineers identify the need for a new radio base station where the existing signal strength is insufficient to support network requirements, or where demand on the system is such that we need to increase capacity. The location of each radio base station is determined by the following factors:-

- The proximity of adjacent radio base stations and the signal coverage from them.
- The terrain height of the area and surrounding topography.
- The height and density of the buildings and structures within the area.
- The potential customer demand within the area.
- The service type that is required.

3.0 SITE SELECTION PROCESS

The following site selection procedures apply to each installation to identify and sequentially discount alternative site options:-

1. Following a technical review which identifies need, Telefónica / Vodafone radio engineers undertake a desktop analysis to identify the best way of meeting the site requirement. This is completed by using Telefónica / Vodafone computerised radio propagation modelling tools. These tools show every site on both existing networks and identifies those areas where insufficient signal level exists or where there is a need to increase capacity.
2. The desktop search also identifies other operators’ existing telecommunications installations. This interrogation of databases ensures any mast-sharing opportunities are maximised. Where available the LPA’s mast register is also reviewed.
3. The radio engineers define a search area, which is then issued to an acquisition agent who undertakes a detailed ground search with the radio engineer to identify suitable options.
4. The acquisition agent will obtain site-specific details to identify those sites that are viable options. The possible options are short-listed according to those that combine the following: location within or close to the search area, a willing landlord with acceptable commercial terms, adherence to planning and environmental

policy, and other site specific issues such as initial power and link availability. These options are then returned to the radio engineers for a computer modelling assessment, taking into account the ground height, potential available antenna height and surrounding obstructions.

5. Discussions are offered to the local planning authority to consider local policies and any protected areas and to agree additional public consultation if required. These discussions are used to identify a 'preferred' option.
6. A plan for local consultation is drawn up, and where appropriate, a consultation exercise is undertaken with the local community.
7. Finally a site survey provides a full structural analysis of the site including confirming power routes and how the site will be linked into the network. Terms with the landlord are then finalised, detailed plans prepared and the application submitted.

Telefónica and Vodafone are committed to ensuring the number and visual impact of any additional sites is minimised. Telefónica and Vodafone will continue to develop and utilise sympathetic and innovative design solutions.

4.0 PLANNING POLICY GUIDANCE ON TELECOMMUNICATIONS

The National Planning Policy Framework (NPPF) was published on 27th March 2012. The NPPF supports high quality communications infrastructure and recognises it as a strategic priority. Paragraph 42 states that: *"Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services."*

The NPPF goes on to state in paragraph 46 that*: "Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure."*

5.0 SITE / MAST SHARING

Telefónica and Vodafone actively encourage and support site sharing for both commercial and environmental reasons. All operators are required to explore site-sharing opportunities under the terms of their licences. Telefónica and Vodafone have implemented a number of measures to identify and maximise site-sharing opportunities through their network sharing agreement.

6.0 COUNCILS

6.1 Moratoria

Government guidance on mobile telecom installations advises that local authorities should make suitable council owned property available to network operators for base station development. If suitable council sites are not made available, operators may have to look for alternative sites which the local community might find less acceptable.

Moratoria may also increase the number of new sites needed as council owned buildings are often better suited for base stations e.g. tall buildings. The operators believe it is preferable to deal with proposed developments on council property on a case by case basis.

6.2 Mast register

Guidance in the Government's Code of Best Practice on Mobile Phone Network Development recommends that local authorities develop a register of local base stations based on a map.

The Code goes on to say, *"Ideally, all the information should be available to be viewed electronically and in hard copy. Local authorities should ensure that the mast register is kept up to date and may make a reasonable charge if anybody wishes to obtain a copy of any of the information."*

7.0 Consultation with schools

The operators fully comply with Government Guidance on pre application consultation with schools and colleges. They provide evidence to the local planning authority that they have consulted the relevant body of the school or college.

The Government's Code of Best Practice on Mobile Phone Network Development gives guidance on the factors operators should consider when determining whether consultation is required, as each development is different. These factors are equally applicable for Local Planning Authorities who carry out their own consultation once the application has been submitted. A recent report stated that there is no scientific basis for siting base stations away from schools (NRPB report, January 2005)

8.0 LEGAL CASES
The following legal cases may be helpful;-

8.1 Harrogate case November 2004
The Court of Appeal gave a judgment that Government Planning Guidance in PPG8 (now replaced by NPPF) is perfectly clear in relation to compliance with the health and safety standards for mobile phone base stations. The Court of Appeal and the High Court both upheld Government policy in response to a planning inspector's decision that departed from that policy and failed to give adequate reasons for doing so.

8.2 Winchester case November 2004
The Court of Appeal decision upheld an earlier decision by Mr Justice Sullivan that a mobile phone network operator should not use its compulsory acquisition powers as part of its day to day radio base station siting processes.

The Court of Appeal agreed with Mr Justice Sullivan that these far-reaching statutory powers were never intended for use in day to day planning situations and should be used by an operator only as a last resort when there is no other siting alternative. The House of Lords on 16 March 2005 refused leave to appeal the Court of Appeal ruling.

8.3 Bardsey case January 2005
The Court of Appeal confirmed that the permitted development regime for mobile phone base stations is compliant with the Human Rights Act.

This was a case in which a local planning authority failed to comply with its obligations to act within the 56 day period provided under the permitted development regulations.

9.0 FURTHER INFORMATION
We trust the above answers your main queries regarding our planned installation.

The enclosed site-specific details will identify the alternative discounted options and reasons why they were rejected and how the proposed site complies with national and local planning policies.

The Local Government Ombudsman's Special Report on Telecommunication Masts gives some positive recommendations and advice to Local Planning Authorities in determining Prior Approval applications. A copy of the report is available at http://www.lgo.org.uk/pdf/phone-masts-sr.pdf

HEALTH AND MOBILE PHONE BASE STATIONS

We recognise that the growth in mobile technology has led in some cases to public concern about perceived health effects of mobile technology and its deployment, in particular about siting masts close to local communities. Quite naturally, the public seeks reassurance that they are not in any way harmful or dangerous.

We take these public concerns seriously and are committed to providing the latest independent peer-reviewed research findings, information, advice and guidance from national and international agencies on radio frequency (RF) electromagnetic fields.

Telefónica and Vodafone ensure that our radio base stations are designed and operated so that the public are not exposed to radio frequency fields above the guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). In fact, radio base stations operate at low power and emit low levels of radiofrequency fields, typically hundreds to thousands of times lower than the ICNIRP general public guidelines.

Research Reviews

There are about 1400 peer-reviewed publications on the biological and health effects of RF signals[2], which are used in mobile communication technology. The scientific community have collated, summarised and assessed these publications in research reviews, the most influential in the UK being the Mobile Phones and Health Report (also known as the Stewart Report) by the Independent Expert Group on Mobile Phones under the chairmanship of Professor Sir William Stewart. These research reviews are used by Governments to develop policy on exposure to radiofrequency signals.

Published in May 2000, the Stewart Report concluded that the balance of evidence did not suggest that exposures to radio frequency fields below international guidelines could cause adverse health effects, although it acknowledged that biological effects might occur below these values. The report stressed, however, that a biological effect does not necessarily mean a negative impact on health. Walking, drinking a glass of water or listening to music all produce biological effects.

Since 2000, over 30 further reviews have been carried out, carefully considering many hundreds of pieces of research. Most have made similar recommendations and have come to similar conclusions: that research should continue to address any gaps in the knowledge; and that overall, the possibility of adverse health effects from mobile communications remains unproven.

In June 2011 the World Health Organisation (WHO) noted that *"A large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have been established as being caused by mobile phone use"* WHO factsheet 193: Electromagnetic fields and public health: mobile telephones. Research reviews are used by guideline setting bodies and Governments to develop advice and public policy on exposure to the signal used by mobile communications technology.

Compliance with International Exposure Guidelines

All Vodafone and Telefónica installations are designed, constructed and operated in compliance with the precautionary ICNIRP public exposure guidelines as adopted in EU Council Recommendation of 12 July 1999 on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz). These guidelines have been set following a thorough review of the science and take into consideration both thermal and non-thermal effects and are there to protect all members of the public 24 hours a day. In addition, precautionary measures have been taken into account when setting relevant guideline limits for the public (i.e. in the UK a safety factor of 50 times is applied to the public exposure guideline).

When measured, field strengths are typically hundreds to thousands of times lower than the precautionary ICNIRP general public guidelines.

An ICNIRP certificate is provided with every planning application and this certifies that the mobile phone base station, when operational, will meet the precautionary ICNIRP guidelines. We also provide further documentation to clarify that the ICNIRP certificate declares that emissions from all mobile phone network operators' equipment on the site are considered when determining compliance.

[2] Source: MMF web site: http://www.mmfai.org/public/research-overview.cfm?lang=eng

ICNIRP Guidelines

The radiofrequency public exposure limits for EMF fields were developed by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) http://www.icnirp.org following reviews of all the peer-reviewed scientific literature, including thermal and non-thermal effects. ICNIRP is a non-governmental organisation formally recognised by WHO. Established biological and health effects have been used as the basis for the ICNIRP exposure restrictions. The ICNIRP guidelines have been adopted for use in the European Union and the UK.

In August 2009, ICNIRP published a review of the guidelines for limiting RF exposure and concluded that "*it is the opinion of ICNIRP that the scientific literature published since the 1998 guidelines has provided no evidence of any adverse effects below the basic restrictions and does not necessitate an immediate revision of its guidance on limiting exposure to high frequency electromagnetic fields.*"

Further Information:

- **World Health Organisation -** http://www.who.int/peh-emf/en/
  EMF Project

- **ICNIRP -** http://www.icnirp.org/
  International Commission on Non-Ionizing Radiation Protection

- **Health Protection Agency**
  - http://www.hpa.org.uk/HPA/Topics/Radiation/UnderstandingRadiation/1158934607698/

- **UK Mobile Telecommunications and Health Research -** http://www.mthr.org.uk/

- **UK Mobile Operators Association -** http://www.mobilemastinfo.com/

Or contact:
EMF Enquiries, Cornerstone
The Exchange, Arlington Business Park, Theale, Berks, RG7 4TY
Tel. 01753 564306, emf.enquiries@cornerstonemobile.net

Our ref: 136441_VF

Head of Planning
Camden Council
Regeneration and Planning
6th Floor
Camden Town Hall Extension
Argyle Street
London
WC1H 8EQ

27.03.14

Dear Sir or Madam,

CLARIFICATION OF THE DECLARATION OF ICNIRP COMPLIANCE ISSUED AS PART OF THE PLANNING APPLICATION ATTACHED FOR THE SITE AT 63-66 HATTON GARDEN, LONDON, EC1N 8LE F

I refer to the Declaration of Conformity with ICNIRP Public Exposure Guidelines ("ICNIRP Declaration"), sent with this application in relation to the proposed telecommunications installation as detailed above.

The "ICNIRP Declaration" certifies that the site is designed to be in full compliance with the requirements of the radio frequency (RF) guidelines of the International Commission on Non-Ionizing Radiation (ICNIRP) for public exposure as expressed in the EU Council recommendation of July 1999.

The ICNIRP declaration produced by Vodafone Ltd takes into account the cumulative effect of the emissions from the proposed installation and <u>all</u> radio base stations present at, or near, the proposed location.

The radio emission compliance calculation is based upon the maximum possible cumulative values. 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. If you have any further enquiries concerning the "ICNIRP Declaration" certificate or anything else in this letter then please contact the Cornerstone EMF UNIT on 01753 564306.

Yours faithfully,

PROJECT MANAGER
Mono Consultants Ltd

For and on behalf of Cornerstone Telecommunications Infrastructure Limited (CTIL) and Vodafone Limited as a duly authorised agent

Our ref: 136441_VF

Declaration of Conformity with ICNIRP Public Exposure Guidelines
("ICNIRP Declaration")

Vodafone Limited
Vodafone House
The Connection
Newbury
Berkshire
RG14 2FN

Declares that the proposed equipment and installation at

63-66 Hatton Garden,
London,
EC1N 8LE

NGR E531300 N181926

is designed to be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionizing Radiation (ICNIRP), as expressed in the EU Council recommendation of 12 July 1999 * "on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz)".

* Reference: 1999/519/E

Date 27.03.14

Signed 

Name Chelsey Swain

Position Project Manager