

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Canterbury Mansions	Site Address:	Lymington Road
NGR:	525530/184913		West Hampstead
			Kilburn
			London NW6 1SE
Site Ref Number:	59393	Site Type: ¹	Macro

1.1 Background

In April 2010 T-Mobile UK and Orange UK merged to form a 50:50 joint venture known as 'Everything Everywhere'. Everything Everywhere is licensed to operate both GSM (Global Systems for Mobile Communications) and UMTS (Universal Mobile Telecommunications System) in the United Kingdom for the delivery of Second, Third and Fourth Generation telecommunication services. Hutchison 3G Limited (known as the operator 3 or H3G) is also sharing the Everything Everywhere network.

Everything Everywhere had a telecommunications site located on the rooftop of 65 Maygrove Road, Kilburn, NW6 2EH. The property was being redeveloped, and on 18 August 2012, Everything Everywhere stationed a temporary moveable telecommunications base station consisting of a cabin topped with a 15m lattice mast topped with antennas and development ancillary thereto (known as a Portacell), to the rear of the property, using emergency measures. The rooftop equipment was removed.

The operators then searched for a permanent replacement site in order to continue to provide coverage to this area. Details of the investigations are provided in section 6. Another temporary alternative was identified on a rooftop at Canterbury Mansions. In July 2014, temporary equipment was installed there using emergency measures, and the temporary equipment at the rear of Maygrove Road was removed.

The search for a permanent replacement site continued but no alternatives have emerged. It is therefore proposed to replace the existing temporary equipment at Canterbury Mansions with permanent equipment, as it has been identified as being capable of providing replacement coverage and is available on a permanent basis.

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:		
Planning records were utilised in lieu of a mast register.		
Was the industry site database checked for suitable sites by the operator:	Yes	No
If no explain why:		

¹ Macro or Micro

Annual roll out consultation with LPA

Date of last annual rollout information/submission:	07/10/13
Name of Contact:	Chief Planning Officer
Summary of outcome/Main issues raised:	The forthcoming rollout was put out as a joint submission by the MOA on behalf of the 5no. Mobile operators. No issues are noted as having been raised.

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	N/A	
Was there pre-application contact:	Yes	No
Date of pre-application contact:	N/A	
Name of contact:	N/A	
Summary of outcome/Main issues raised:		
Given the presence of the existing equipment and the lack of alternative sites and designs, a decision was taken to proceed to seeking a formal determination from the local authority		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green	Amber	Red
Outline Consultation carried out:	Following an assessment of the application site and surrounding area, the site was assigned a Traffic Light Rating (TLR) of amber. Given the location of the existing equipment, a notification letter will be sent to the ward councillors to inform them of this proposal.		
Summary of outcome/Main issues raised:	N/A. Should any responses be received, they will be dealt with as well as being forwarded to Council.		

School/College

Location of site in relation to school/college:
A search of Ofsted records showed the nearest schools/nurseries/colleges to be more than 350m from the application site.
Outline of consultation carried out with school/college:
Due to the distance from site, consultation with schools/colleges was not considered appropriate.
Summary of outcome/Main issues raised:
N/A

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		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	N/A – not prior approval application	

3. Proposed Development

The proposed site:
<p>The application site is Canterbury Mansions, a four storey red brick building at the junction of the B510 West End Lane and Lymington Road. It has a mansard roof attic set back from the edge of the fourth floor, which features chimneys and dormer windows and decorative gabling. The north west corner of the roof features a turret. The roof itself accommodates two large lightwells and a skylight. The site is in residential use apart from the ground floor which is used for business purposes.</p> <p>Buildings lining West End Lane are of similar size and use to that of the application site, although some are more utilitarian in appearance, particularly the 1970's brick building adjacent to the south. Those buildings to the east, along Lymington Road, comprise primarily two storey residential houses. To the south approximately 150m away is the West Hampstead station of Thameslink.</p> <p>Under the Camden Proposals Maps, the site falls near the southern boundary of the West End Green Conservation Area and within the Town Centre designation.</p>

Enclose map showing the cell centre and adjoining cells:
Please refer to coverage plots which will be forwarded under separate cover.

Type of Structure:
Description: <ul style="list-style-type: none">• Replacement of 3no. temporary antennas and supporting structures with permanent antennas and supporting structures.• Retention of existing 300mm dish antenna.• Retention of existing cable trays installed using emergency powers.• Retention of existing handrailing installed using emergency powers.• Retention of existing equipment cabinet and Link/AC cabinet installed using emergency powers.• Installation of new equipment cabinet.• Development ancillary thereto.

Overall Height:			
Height of existing building:			17m
Equipment Housing:	Flexi R2 & UCU Mk2	Huawei 3900 (AC)	MK4 Link A/C
Length:	0.448m	0.6m	0.6m
Width:	0.574m	0.48m	0.5m
Height:	0.133m	1.6m	1.52m
Materials:			
Tower/mast etc – type of material and external colour:		Standard colours.	
Equipment housing – type of material and external colour:		Steel. Link A/C – grey. Flexi – grey. Huawei – dark green RAL 6009.	

Reasons for choice of design:
<p>The Applicants were conscious of the fact that the site is located within mixed use urban surroundings and within a conservation area, and took appropriate efforts during the design process to ensure that the visual impact of the proposal was minimised and the character and appearance of the area would remain unharmed.</p> <p>It must be noted, however, that the design was also heavily influenced by technical constraints.</p> <p>There are 3no. main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signal(s), the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the power source (meter cabinet or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.</p> <p>In order for the base station to effectively provide coverage to the desired areas and fit in with the established network pattern, specific antenna orientations and heights, determined by the radio planners, must be achieved. Features of the surrounding area such as existing buildings and trees, referred to as “clutter” must also be cleared in order that they do not block the signals from the antennas. There are also limitations on how far from the antennas the equipment housing can be placed, as the quality of the signal deteriorates as the length of the feeder cables linking them increases.</p> <p>In this case, the antennas have been located at the edge of the mansard rooftop, behind decorative gabling on the western edge and near chimneys on the eastern edge, set back from the building facade. If the antennas were to be located more centrally, they would need to be higher, and likely to be more visible, in order to prevent the edges of the rooftop from ‘clipping’ the signal. Their current location allows an effective replacement signal to be delivered to the surrounding area whilst keeping their height to a minimum. The equipment cabinets have been located in the centre of the roof adjacent to a lightwell. This central location reduces their visibility and enables their close proximity to the antennas. The handrailing is a necessary safety feature on a rooftop with a small parapet. The size and amount of equipment has been kept to the minimum with which the site can operate effectively. The use of a building is in direct compliance with local and national planning policy.</p> <p>It is considered that this design is appropriate at this location, enabling the proposed installation to be assimilated into its busy environment without significant adverse impact on neighbouring properties or the wider visual amenity and maintaining the character and appearance of the conservation area, similar to the existing temporary installation</p>

Technical Information

<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)*</p> <p>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.</p> <p>When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, Everything Everywhere operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p> <p>As part of Everything Everywhere's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>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.</p> <p>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.</p>	Yes	No
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4. Technical Justification

Reason(s) why site required e.g. coverage, upgrade, capacity:
Coverage plots will be forwarded under separate cover.

5. Site Selection Process – alternative sites considered and not chosen

<p>Prior to selecting the replacement site location, a comprehensive investigation within and beyond the cell search area was undertaken by the applicant's coverage planner, acquisition agent and planning consultant and potential options were investigated.</p> <p>Sites are considered in terms of their technical suitability to provide the required level of service, the effect on visual amenity and their ability to be acquired, built and maintained. The aim of site identification is to find the most technically efficient available site, which has the minimum impact on visual amenity. Sites are required to be as central to the area requiring coverage as possible. In this instance, the need is to provide replacement coverage for the original site at 65 Maygrove Road</p>
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In order to achieve the optimum environmental solution, the applicant applied the sequential site selection process as within the Code of Best Practice on Mobile Phone Network Development. This meant that the initial cell search area investigation focussed on an exploration of existing masts or other suitably tall structures or buildings that may be appropriate for the accommodation of the apparatus.

In addition to the physical survey of the area, Ofcom's national register of base stations has been consulted in order to identify any other telecommunications installations which could be utilised in order to replace the 2G & 3G coverage. This has been cross referenced with searches of the local authority's planning register. It must be noted that the search area for a replacement site is more limited than that of a new site as, in order to fit into the established network pattern and adequately replicate existing coverage, it is important to locate replacement sites as close as possible to the ones that they are replacing.

The table overleaf contains details of the alternative site options that were investigated during the site selection process and the reasons they were discounted.

Site²	Site Name and address	Indicative NGR	Reason for not choosing³
RT ETS	Orange GLN0144 Ellerton House 30 Mill Lane, London NW6 1LX	524785,185079	The site provider, Camden Housing, will not agree to sharing rights to allow all three operators to utilise the site. Given its location and height of approximately 35m, it would have been ideal to provide replacement coverage. Without the site provider's permission, the operators cannot develop the site and the option was discounted.
GF ETS	Vodafone 78373 Street furniture site Iverson Road NW6 2HL	525397,184808	This 12m street furniture site, outside the West Hampstead train station, does not have any space available for redevelopment. Consequently Network Rail do not want the site redeveloped. The option has been discounted for these reasons.
GF	Railtrack Depot Iverson Road NW6 2RB	525242,184781	Railtrack refused permission for a mast to be developed here as the area has been earmarked for redevelopment. The operators cannot progress a site without permission from the site provider and the option has been discounted on this basis.
GF	Liddell Road Industrial Estate Liddell Road NW6 2EW	525110,184795	There is insufficient space to install equipment at this location and it was discounted for this reason. The site is also a Potential Development Site within the LDF.
GF	Iverson Tyres 159-161 Iverson Road NW6 2RB	525283,184797	The site provider declined to allow a mast on site due to concerns over loss of parking space. Without the site provider's permission to progress the proposal, this option was discounted.
GF	Storage depot Broomsleigh Street NW6 1PT	525043,184930	The depot, used by HSS Storage, does not have enough space for installation of the equipment. It has been discounted on this basis.

² ETS – Existing Telecomm site, ES – Existing Structure, RT – Roof Top, GF – Greenfield

³ SP – Site Provider, RD – Redevelopment Not Possible, T – Technical Difficulties, P – Planning, O - Other

Site4	Site Name and address	Indicative NGR	Reason for not choosing5
GF	The old Garden centre -		The centre has planning permission for redevelopment of the site and is not interested in allowing telecoms equipment on site. The option was therefore discounted.
GF	C Taverner and Sons 188 Iverson Road NW6 2HL	525321,184693	There are various workshops on site but the site provider confirmed no interest given the difficulty of finding an appropriate design that would achieve replacement coverage and reduce impact on the adjacent new housing.
GF	Between the Lines 187-199 West End Lane	525475,184663	The area, with various car store areas and repair shops, is subject to redevelopment (Domaine Developments). As no response has been received from the site provider, the option cannot be progressed.
GF	Asher House Blackburn Road West Hampstead NW6 1AW	525655,184753	The site is owned by the Loftus Family Trust which has confirmed no telecoms development will be allowed. In addition, the site has been earmarked for development.
RT	Travis Perkins 156 West End Lane Hampstead NW6 1SD	525551,184870	The site provider has not responded to attempts by the operators' agent to determine interest in allowing telecoms equipment on the rooftop. In addition, the site is within an area earmarked for redevelopment.

The Planning Inspectorate has specifically addressed discounting alternative options based upon a landlord's unwillingness to accommodate a facility. The Appellant appealed against the decision of Three Rivers District Council to refuse prior approval for the siting and appearance of a 15m high lattice mast and ancillary development (APP/P1940/A/01/1077913). The Inspector recognised that the Appellant had undertaken a thorough investigation of the area. In relation to sites not available due to landlord issues, the Inspector concluded '*I consider that alternative sites need to be genuinely available to be given serious consideration in an assessment of options.*' This applies equally to sites from which no response has been received from site providers.

An appeal by Orange PCS against Stafford Borough Council also addressed the issue of alternative sites. In allowing the appeal the Inspector stated in addressing local plan policies '*Nor do I consider it is either realistic or reasonable to take the view that the absence of consideration of every possible option and alternative would mean that this policy was complied with ... PPG8 does not indicate the need to embark on an examination of every possible alternative in an iterative process ... the adequate analysis of feasible alternatives is a more realistic approach.*' (APP/Y3425/A/02/1084110).

If no alternative site options have been investigated, please explain why:

N/A

A comprehensive search has been undertaken. Existing telecoms sites are not available to provide replacement coverage. It is considered that the application site provides a good balance between achieving replacement coverage and minimising visual impact.

⁴ ETS – Existing Telecomm site, ES – Existing Structure, RT – Roof Top, GF – Greenfield

⁵ SP – Site Provider, RD – Redevelopment Not Possible, T – Technical Difficulties, P – Planning, O - Other

Additional Relevant Information

PLANNING POLICY

National Planning Policy Guidance

The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. The main thrust of the guidance is a presumption in favour of sustainable development. In general terms in respect of telecommunications the guidance aims to promote sustainable transport (including the need to travel), build a strong and competitive economy, and seeks to secure high quality design.

Specifically, the National Planning Policy Framework advises that advanced, high quality communications infrastructure is essential for 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 numbers of radio and telecommunications masts should be kept to a minimum and, where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate (paragraph 43).

The NPPF also advises on conserving the historic environment. It sets out how local planning authorities should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. At paragraph 132 it goes on to state that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be'. Paragraph 135 goes on to state that 'in weighing applications that affect directly or indirectly on 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'.

In more general terms the NPPF confirms that proposals that accord with the provisions of the development plan should be approved without delay (paragraph 14). In addition a set of core planning principles are set out at paragraph 17. These principles set out (in part where relevant to this proposal) that the planning system should:

- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;
- seek to secure high quality design and a good standard of amenity;
- support the transition to a low carbon future in a changing climate.

Significant weight is given to the need to support economic growth through the planning system (paragraph 19). The reduction in the need to travel is set out in section 4.

The National Planning Policy Framework advises specifically that local planning authorities should not seek to prevent competition between operators, and must determine applications on planning grounds (paragraph 46).

It is considered the proposal complies with the aims of the NPPF. The proposal, a direct replacement for a site that was lost due to reasons beyond the Applicant's control, will not increase the number of installations in the area. It has a high quality of design appropriate to the site, which preserves the character and appearance of the conservation area.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 requires planning applications to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The current adopted development plan for the London Borough of Lambeth comprises:

- The London Plan: Spatial Development Plan for Greater London July 2011; and
- The Camden Local Development Framework, specifically the Core Strategy 2010 – 2025 adoption version 2010 and the Development Policies adoption version 2010.

These are discussed below.

The London Plan (July 2011)

The London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In Paragraphs 1.38-1.41 '*Ensuring the infrastructure to support growth*', the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to secure its long-term growth.

It is considered that the applicants' networks are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in Policy 4.11 '*Encouraging a Connected Economy*' of the Plan, which states that:

"Strategic

A. The Mayor and the GLA Group will, and all other strategic agencies should:

a. facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive broadband access meeting the needs of enterprises and individuals.

b. support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits."

At paragraph 4.55 of the supporting written justification to policy 4.11, the Mayor "*wishes to ensure sufficient ICT connectivity to enable communication and data transfer within London, and between London, the rest of the UK and globally*" and "*...support ubiquitous networks – those supporting use of a range of devices to access ICT services beyond desk-based personal computers..*" Furthermore, at paragraph 4.57, the Mayor states the intention to "*...support competitive choice and access to communications technology, not just in strategic business locations but more broadly for firms and residents elsewhere in inner and outer London, and to address e-exclusion amongst disadvantaged groups.*"

Policy 4.11, and its supporting justification, is clearly supportive of the type of development proposed.

Local Development Framework

Camden Core Strategy 2010 – 2025 adoption version 2010

There appears to be little of direct relevance to the proposal in this document. It notes that *‘West Hampstead is potentially a major interchange in northwest Camden, with three stations providing five railway services – all within 200 metres of each other.’* As part of the area to be covered includes the railway infrastructure, the importance of the permanent site proposed in this application is evident. The strategy also notes that Camden has a relatively young population, with a concentration of people in the working ages; those with high usage of the services available on the applicants’ network.

In addition, paragraph 21 of the NPPF (2012) advises LPA’s to *‘plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;’* and paragraph 29 recognises that *‘Smarter use of technologies can reduce the need to travel.’* The replacement installation proposed in this application will enable Everything Everywhere and H3G to continue to provide high quality coverage to the surrounding area, forming part of a network of high technology. The network allows home working and can reduce the need to travel, thus contributing to the sustainability agenda.

Development Policies adoption version 2010

Policy DP24 - Securing high quality design

This policy sets out that the Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider, amongst other things: a) character, setting, context and the form and scale of neighbouring buildings; b) the character and proportions of the existing building, where alterations and extensions are proposed; and c) the quality of materials to be used.

Given the antennas and other equipment are set back from the main face of the building, they will be blocked from views on approach from the south by the adjacent taller building and from the north by Lymington Mansions, and from the west by the buildings on the western side of West End Lane. Where the antennas are visible, they will be seen amongst the chimneys, decorative gabling and dormer windows, blending into the existing rooftop infrastructure. Thus the design has taken into consideration the setting and context of the area and will not interfere with the character and proportions of the building nor the scale and form of neighbouring properties.

Policy DP25 - Conserving Camden’s heritage - Conservation areas

In terms of conservation areas, this policy sets out that in order to maintain the character of Camden’s conservation areas, the Council will amongst other things: a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas; and b) only permit development within conservation areas that preserves and enhances the character and appearance of the area.

The West End Green Conservation Area Appraisal and Management Strategy was adopted 28 February 2011. It sets out that Canterbury Mansions makes a positive contribution to the conservation area. The proposed scheme, as evidenced by the existing temporary scheme, will not diminish this contribution, either along West End Lane or Lymington Road. It notes the view from the station into the conservation area *‘has been blighted ... by the low grade shops and ad hoc buildings over the tracks and the 1970s office block on the east side’*. The 1970s building whilst on the one hand having a negative effect on the conservation area, serves to screen the application site from views from the south as it is taller than Canterbury Mansions.

The appraisal and strategy emphasises the importance of maintaining the special character of an area. The proposal does not represent an extension to the roof. Its set back ensures it will not break the composition of the roof line thus preserving the appearance of the conservation area. As described

earlier, the antennas are located where they blend in with and are screened by chimneys, decorative gabling and surrounding buildings. Their low visibility ensures the character of the conservation area is maintained.

Overall, it is considered the proposal complies with both national and local policy. The proposal is sympathetically designed and would have minimal impact on the host building and assimilate well into the wider area and not harm its conservation area setting.

Contact Details

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Signed:		Date:	12/02/14
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