SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	**ABC Self-Storage**	Site Address:	**145-147 YORK WAY LONDON N7 9LG**
NGR:	**529923 184852**		
Site Ref Number:	**14698**	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: **The proposed development is for the installation of apparatus upon an existing base station**		
Was the industry site database checked for suitable sites by the operator:	**Yes**	No
If no explain why:		

Annual roll out consultation with LPA

Date of last annual rollout information/submission:	**October 2009**
Name of Contact:	**The Chief Planning Officer**
Summary of outcome/Main issues raised:	**Whilst no direct response has been received with regard to the current rollout proposals, previously it has been noted that as with most authorities, Camden Council encourages the utilisation of existing masts and structures in the first instance. In the absence of such sites, any proposal should be sited and designed so as to minimise visual intrusion. It is of note however that at the time the Roll Out plans were produced the specific requirement that the development proposed in this case did not exist, it only became apparent with the ongoing development of Vodafone / O2's joint network coverage requirement.**

[1] Macro or Micro

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: **Due to the minor nature of the proposed upgrade works no pre-consultation was carried with the local authority.**		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	**Green**	Amber	Red
Outline Consultation carried out: **Consultation letters to ward councillors (Councillors Mason, Braithwaite & Jones)**			
Summary of outcome/Main issues raised: **Consultation letters issued at same time as planning application**			

School/College

Location of site in relation to school/college: • **Brecknock Primary School, Cliff Villas, London, NW1 9AL** • **The Bridge Primary School, 215 Hungerford Road, London, N7 9LD** • **Hungerford Primary School, Hungerford Road, York Way, London, N7 9LG**
Outline of consultation carried out with school/college: **Consultation letters issued at same time as planning application**
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:		

Developer's Notice (only required for an application for prior approval)

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

3. Proposed Development

The proposed site:
ABC Self-Storage (145-147 York Way) is a 20m high warehouse which is currently used for storage. The building already accommodates three telecommunications base stations and is set in the commercial area of York Way.

Type of Structure: **Commercial building**		
Description: **The replacement of two existing O2 antennas with two O2/Vodafone antennas in the same position and installation of ancillary development thereto.**		
Overall Height: **23.9m**		
Height of existing building		**20** Metres
Equipment Housing: **N/A (within existing O2 cabin)**		
Length:		Metres
Width:		Metres
Height:		Metres
Materials:		
Tower/mast etc – type of material and external colour:	**Antenna – Grey Plastic**	
Equipment housing – type of material and external colour:	**N/A**	

Reasons for choice of design:
The minor redevelopment of this existing base station shall ensure that Vodafone can share the site and provide additional network coverage and capacity for Vodafone's network, whilst minimising the impact of the development upon the local area. This approach accords with the recommendations held within PPG8.

4. Technical Information

ICNIRP Declaration attached ICNIRP 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 the site are taken into account.	**Yes**	No

Frequency:	**2100mhz**
Modulation characteristics[2]	**QPSK**
Power output (expressed in EIRP in dBW per carrier) In order to minimise interference within its own network and with other radio networks, (NAME OF OPERATOR) 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 (NAME OF OPERATOR)'s network, the radio base station that is the subject of this application will be configured to operate in this way.	**32dBw**
Height of antenna (m above ground level)	**22.6 metres**

5. Technical Justification

Enclose predictive coverage plots.

Reason(s) why site required e.g. coverage, upgrade, capacity (map attached if required):
The development is required in order to provide additional Vodafone 3G network services to the York Way area of London. This is required to be improved as part of a countrywide drive to increase 3G network coverage and capacity. **The coverage plots attached as part of the application illustrate the need for an installation in this area to provide additional 3G network coverage and capacity to Vodafone. As shown in Plot A there is a deficiency in the existing Vodafone 3G coverage and this is shown by the blue, green and amber shaded areas. The deficiency is greatly reduced as shown in Plot B, which shows predicted coverage with the proposed site integrated into Vodafone's network. As can be seen from Plot B and the increased purple coloured areas, the proposed development shall provide greatly improved 3G coverage to the local area.**

6. Site Selection Process – alternative sites considered and not chosen (Enclose map highlighting all alternatives that have been considered by the operator)

If no alternative site options have been investigated, please explain why: **As this application is for the upgrade of an existing O2 base station in order to provide improved Vodafone 3G coverage and capacity, no alternative locations have been examined. Any new site examined would require a brand new base station and as such would cause a greater visual impact upon the area.**
Additional relevant information:

[2] The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase modulation
The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation

This brief statement outlines the background to this proposal for the upgrade of this existing Vodafone base station at this location and explains it within the context of the wider network and planning policy and Guidance.

Schedule 38(6) of the Planning and Compulsory purchase Act 2004 states **"If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."**

The London Borough of Camden's UPD no longer contains saved policies relating to Telecommunications and these have now been removed from the UDP. The following is an extract from the councils website 'From now until the point where UDP policies are replaced by new policies contained within the Camden Local Development Framework, planning applications will have to be assessed against polices that have been saved, rather than the original 2006 UDP'. Telecommunications falls under this category therefore the council will rely on PPG8 when assessing telecoms planning applications.

It is considered the proposal complies with PPG8 for the following reasons:
(i) The coverage plots attached to the application clearly illustrate the network need for this site in order to provide additional 3G coverage to the area for Vodafone;
(ii) The proposal has been designed to ensure there would be no additional impact on the skyline and the surrounding area. Existing antennas are being replaced on the site and the Vodafone equipment is proposed to be located within the existing O2 internal room
(iii) The proposal utilises an existing structure to provide coverage to the area for Vodafone. The Code of Best Practice and PPG8 stresses the Government's aim to facilitate the growth of new and existing telecommunications systems while keeping the environmental impact to a minimum.
(iv) The proposed development is for the installation of replacement equipment upon an existing building
(v) The replacement of two antennas shall ensure that the provision of additional Vodafone coverage to this area shall have a minimal impact upon both this building and the wider locality.

The Code of Best Practice and PPG8 stresses the Government's aim to facilitate the growth of new and existing telecommunications systems while keeping the environmental impact to a minimum.

PPG8 Paragraph 19 states:

In order to limit visual intrusion, the Government attaches considerable importance to keeping the numbers of radio and telecommunications masts, and the sites for such installations, to the minimum consistent with the efficient operation of the network.

In relation to the new 3rd Generation service requirements, PPG8, Appendix – Supporting Guidance, Paragraph 28 States;

'…They [The Network Operators] are expected to use existing structures where possible (including those owned by other operators and radio site management companies) though they will likely also need to develop a substantial number of new site.'

Paragraph 123 of the Code of Best Practice states **"The Governments General policy on**

telecommunications development is to facilitate the growth of efficient and effective telecommunications 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 also be applied to all.

We believe that the selected option represents the best compromise between the operational needs of Vodafone and O2 and the inevitable environmental impact of telecommunications with this application fully complying with both local and national policy guidelines.

Siting of equipment:

The design and siting of this proposed development has been chosen so as to keep to a minimum the impact upon its surroundings. The removal of the existing O2 antennas and their replacement with shared Vodafone/O2 antennas shall allow for the provision of network services for another operator.

Perceptions of Health and Safety

In response to the growing concern related to the health implications of exposure to electromagnetic fields (EMFs) the Government asked its statutory advisors on radiological protection (the National Radiological Protection Board (NRPB)) to establish an Independent Expert Group on Mobile Phones (IEGMP). This Group considered the concerns about the health effects from the use of mobile phones, base stations and transmitters. The expert groups' report (also known as the Stewart Report) was published in May 2000. It concluded that:

"***the balance of evidence indicates that there is no general risk to the health of people living near to base stations on the basis that exposures are expected to be small fractions of the guidelines***"

It is the Government's view that if a proposed development meets the International Commission on Non-Ionising Radiation Protection (ICNIRP:1998) public exposure guidelines, as recommended on a precautionary basis in the Stewart Report, it should not be necessary for a planning authority, in processing an application, to consider health effects further. This message was re-stated by Nick Raynsford to all English MPs and local authorities in a letter, dated 29 June 2000.

The EU Recommendation is based on ICNIRP (1998) guidelines for limiting general public exposure to electromagnetic fields (radio waves). ICNIRP (1998) guidelines apply a 50-fold safety margin for continuous exposure of the general public to electromagnetic fields, providing a conservative public exposure guideline set at 2% of the level where replicated biological effects have actually been observed.

The UK mobile phone operators will, as a minimum, build base station sites to comply with the ICNIRP (1998) general public exposure guidelines in areas where the public spend a significant amount of time. These areas are those locations where antennas are accessible to the public without the use of climbing aids such as ladders, crossing barriers or other access controls.

Planning Policy Guidance Note 8 also makes reference to Health and Safety implications of telecommunications proposals and clearly states in paragraph 30 that:

"…it is the Government's firm view that the planning system is not the place for

determining health safeguards. It remains central Government's responsibility to decide what measures are necessary to protect public health. In the Government's view, if a proposed mobile phone base station 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."

Although this quote comes from the PPG 8 published in August 2001, this message builds upon earlier Government statements. For example the Government's announcement on 16 March 2001 on 'Better public consultation on mobile phone masts' stated:

"It is the Government's responsibility to decide what measures are necessary to protect public health. It remains the Government's firm view that the planning system is not the appropriate mechanism for determining health safeguards… In the Government's view, if a proposed development meets the ICNIRP guidelines it should not be necessary for a local planning authority, in processing an application, to consider the health aspects further."

In a more recent report, HEALTH EFFECTS FROM RADIOFREQUENCY ELECTROMAGNETIC FIELDS: By the Independent Advisory Group on Non-Ionising Radiation (AGNIR), published on the 14th January 2004, AGNIR has stated that **"…exposure levels in the vicinity of mobile phone base stations are extremely low and the evidence indicates that they are unlikely to pose a health risk."**

Following on from this, the first part of the Danish Interphone study was published in January 2004. The conclusion reached from the first part of their study was that : **"On the basis of these first data from the Interphone Study, we conclude that there is no evidence for an association between use of cellular telephones and the risk of developing acoustic neuroma."**

The results of the second part of this study were published on the 13th April 2005 in 'The Journal of the American Academy of Neurology'. The conclusions reached by this study was that **"In this nationwide population based case-control study of incident meningiomas and gliomas, we found no support for the hypothesis that use of cellular telephones increases the risk for these brain tumours."**

In their Factsheet (No.304) entitled ' Electromagnatic Fields and Public Health – Base Stations and Wireless Technologies' of May 2006 the World Health Organisation concluded; **" Considering the very low exposure levels and research results collected to date, there is no convincing scientific evidence that the weak RF signals from Base stations and Wireless Networks cause adverse health effects."**

This was further substantiated in the findings, of the recent Danish study, of the "Cellular Telephone Use and Cancer Risk: Update of a Nationwide Danish Cohort" published on the 8th December 2006, in the "Journal of the National Cancer Institute". This is a follow-up to the 2001 paper from the same study group. The study group was over 400k private Danish mobile phone users (as of 1982-1995) has been monitored for cancer incidence and statistics prepared to investigate the association of disease with various agents including mobile phone use. Overall, this study should be seen as reassuring for our customers in that it is the first such study to make strong reassuring statements about long-term mobile phone use not being associated with an increased risk of cancer. The report concludes that: ***"We found no evidence for an association between tumor risk and cellular telephone use among either short-term or long-term users. Moreover, the narrow confidence intervals provide***

evidence that any large association of risk of cancer and cellular telephone use can be excluded"

Cancer Research UK have recently stated; **"Many research studies have failed to find an increased brain cancer risk to mobiles. Mobile phone base stations are unlikely to increase your cancer risk either. The exposure you would get from a base station is usually a hundred times or more below international guidelines. And it is much less than the exposure you would get from a phone."**

The Irish Government published a report from an Expert Group on the Health Effects of Electromagnetic Fields in March 2007 which concluded **"So far no adverse short or long-term health effects have been found from exposure to the radiofrequency (RF) signals produced by mobile phones and base station transmitters. RF signals have not been found to cause cancer."**

In relation to the continued operation of the site in relation to the ICNIRP guidelines all base stations are designed so as to operate well within these guidelines. Under the terms of the mobile operators operating licence "a person authorised by the Secretary of State" can take measurements at any time to confirm that maximum permissible levels are not being exceeded. Generally random unannounced audits are undertaken by OFCOM on behalf of the DTI. These random tests can also be requested via the Mobile Operators Information (MOA).

It is also of noted that Research into Radio Frequency has been undertaken globally for the past 50 years or more, the consensus of which is that there is no substantiated link between mobile technology and adverse health effects.

The Stewart report goes on to state **"Some people propose that new developments should only be permitted when they have been shown to be completely safe, but this is unrealistic. Science can never provide a guarantee of Zero risk."**

The House of Commons Science and Technology Committee in its report Mobile Phones and Health further expands on this***;*** **"No matter how much research is done, it will never be possible to prove that something is not harmful. Scientific research can say that there is no evidence of risk or it can demonstrate that any risk is very low, but it cannot produce evidence of no risk."**

One of the key recommendations of the Stewart Report published in 2000 by the Independent Expert Group on Mobile Phones (IEGMP) was that an independent research programme be established in the UK. The Mobile Telecommunications and Health Research Programme (MTHR) commenced in 2001, with the purpose of co-coordinating and scientifically managing a research programme on the possible impact on health from mobile telecommunications. The programme, established by the UK Government, and funded jointly by Government and industry, was conducted under the direction of an independent scientific management committee, free of any influence from the government and industry that funds it. The report concludes "none of the research supported by the programme and published so far demonstrates that biological or adverse health effects are produced by radiofrequency exposure from mobile phones." The report also notes that measurements of radio signals from base stations show that exposures are well below international guidelines.

These MTHR interim findings are consistent with the conclusions that no adverse health effects from mobile phone use have been established reflected in the significant number of independent scientific reviews published in the UK and around the world during the past six

years. Equally reassuring, the MTHR report recognises that no further research is required in certain areas.

In the summation of the recently released largest study carried out to date, no link was shown between mobile phone use and the occurrence of brain tumours. The INTERPHONE study was co-coordinated by the International Agency for Research on Cancer (IARC) in 13 countries including the UK. The findings are consistent with many previous studies that have found no health risk from using mobile phones.

It can be seen that the site subject of this application has been sited and designed in line with current Local, National and International guidelines.

Conclusion

It can be seen that the development as proposed within this application has been sited and designed in line with all local, national and international guidelines as well as the telecommunication industries Code of Best Practice. There is a clear and demonstrable need for the proposal, due consideration has been given to all practicable solutions for providing the required telecommunications service and this proposal has been designed in such a way as to minimise its visual impact upon the surrounding area.

Given the above, we request that due consideration is given to the planning application and we look forward to your determination in due course.

Contact Details

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