

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Gospel Oak	Site Address:	Footpath to north west of 242 Grafton Road, Gospel Oak, London, NW5 4AL
NGR:	E528277, N185361		
Site Ref:	136575_O2	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:	7 th 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:	04/12/12 and 10/02/14
Was there pre-application contact:	Yes No
Date of pre-application contact:	10/03/14
Name of contact:	Neil Quinn
<p>Summary of outcome/Main issues raised:</p> <p>A pre-application consultation email was sent to the LPA on 04.12.12 introducing a number of existing sites, which are earmarked to be upgraded as part of the new CTIL initiative. This email included the option subject to this application, in which it was said that minimal changes were proposed.</p> <p>An application was submitted on 22/03/13 for the removal of the existing 14.8m high monopole with 3no. antennas within a GRP shroud and replacing it with a 15m high Elara pole with 3no. antennas within a GRP shroud (relocated approximately 1.5m). Installing 2no. equipment cabinets and ancillary development. This was approved 31/05/13 (2013/1786/P).</p> <p>Since the planning decision was issued, a change was necessary to the antenna requirement where a double shroud was required instead of the approved single shroud.</p> <p>An email was sent to Neil Quinn on 10/02/14 enquiring as to whether the minor change could be dealt with as a minor amendment. The following response was received on 10/03/14;</p> <p><i>"Apologies for the delay in getting back to you. I have now spoken to my manager and he has advised that it would be likely that the proposal would require a further application, although formal advice would require you to submit a payable pre-application enquiry"</i></p> <p>An application was submitted March and was approved 16/05/14 (2014/2216/P).</p> <p>Subsequently due to underground services, the pole has to be relocated to the rear of the footpath. Taking into consideration the feedback from previous pre application consultation it was decided to progress this application and seek the LPA's formal determination.</p>	

¹ Macro or Micro

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 04/12/12 introducing a number of existing sites, which are earmarked to be upgraded as part of the new CTIL initiative. This email included the option subject to this application, in which it was said that minimal changes were proposed.			
Summary of outcome/Main issues raised: To date no comments have been received.			

School/College

Location of site in relation to school/college: - No school or college was 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

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:	08.07.14	

3. Proposed Development

<p>The proposed site:</p> <p>This application relates to an existing telecommunications installation which is found on-site. For reference please see below a photograph of the base station in-situ: -</p> <div data-bbox="389 1341 1129 1892" data-label="Image"> </div> <p>The proposed installation is located on the footpath of Grafton Road. The footpath is approximately 3.5m wide at the location of the installation. To the rear of the site is a 1.6m high wall with 0.6m high railings on top, this increases to a 2.13m high wall with 1.45m high steel mesh fencing on top behind the pole. Beyond this are railway lines. There is existing street furniture in the locale including 8.0m high lampposts and street signs.</p>

Type of Structure	Elara
Description:	
The installation of a 15 metre dual stack monopole housing six antennas mounted together at the top of the structure. The main stem of the column is cylindrical and will measure 324mm in diameter in which towards the top it will taper to a 540mm diameter antenna shroud. The length of the cylindrical antenna shroud section will be 3700mm.	
Overall Height:	15 metres
Equipment Housing: Approved under application 2013/1786/P	
Tower/mast etc – type of material and external colour:	Galvanised steel - painted black (RAL 9017)
Equipment housing – type of material and external colour:	Galvanised steel - painted black (RAL 9017)

Reasons for choice of design:	
<p>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. 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.</p> <p>Technological advances have enabled a mast share structure that breaks the barriers of conventional schemes, which in the past have typically involved tall heights due to the separation needed between each operator's sets of stacked antennas and or large exposed antenna head-frames. The height of the existing structure is 14.8 metres tall, whilst the new monopole will be 15 metres to top. In this regard the height will increase by 0.2 metres. The proposed height is necessary to retain the continued need for both coverage and capacity of the existing networks. The overall height of the proposed column at 15 metres to top has been kept to its technical minimum given the structure types which are available to the aforementioned operators. The proposed monopole is at a height of 15 metre so as not to compromise on the centre line of the existing antennas and to allow for adequate coverage to the target area. The proposed height and structure type will also cater for future 4G coverage demands, which will enable network restructuring towards a single grid network that can serve both operators. Allowing for the proposed height and once this phase of upgrade rollout is complete it will allow existing base stations elsewhere in each respective network to be reviewed and decommissioned where technically feasible. In this regard, the height and robust extent of development proposed will aid network consolidation and limit future infill requirements.</p> <p>It is highlighted that the antennas in this instance would be concealed within a cylindrical shroud, which would be integral to the upper most section of the monopole. Furthermore, the dimensions of the structure are the thinnest available so as to be able to support the technically preferred antennas and feeder cables. It is of note that the antennas, which function for both operators, are closely spaced together so as to keep the profile of the column as thin as possible. In this respect each operator's antennas are not distinguishable as separate elements, whereby taking into account the form and appearance of proposed column as a whole, to the naked eye the mast share monopole gives the illusion of a single operator installation. In addition, it is considered that in opting to connect the site into the national network via an underground link rather than rely on a transmission dish, this has simplified the design and hence reduced the proposal's prominence in the street scene.</p> <p>The proposed column in its entirety will be painted black in which it is considered that this treatment will help assimilate the column into the street scene. The choice of a slim-line streetworks monopole with shrouded antennas is considered appropriate as it would minimise the visual impact of the development within the street scene. In light of the above and in choosing this particular monopole design, it is considered that the scheme takes a form, which is sympathetic within the context of its immediate street scene.</p> <p>Please note that a 15m high structure was approved in 2013 (ref 2013/1786/P), a 15m high pole which has a double shroud was then approved in 2014 (2014/2216/P). This application is to relocate the approved pole.</p>	

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached	<u>Yes</u>	No
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.		

<p>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.</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>		
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4. Technical Justification

Reason(s) why site required e.g. coverage, upgrade, capacity
<p>It was announced in mid 2009 that the Vodafone Group were to form a strategic partnership with the Telefónica Group to share their telecommunication infrastructure assets across Europe. In the UK this project was called 'Cornerstone' as saw both Vodafone Ltd and Telefónica UK Ltd, commonly known as O2 working closely together to pool their resources and infrastructure making substantial improvements to their 2G and 3G networks. This initial agreement between the two aforementioned operators broke barriers in addressing the historical limitations encountered in conventional mast share schemes. It allowed both organisations to consolidate a number of base stations through, where appropriate, sharing each others sites and in turn significantly reducing the environmental impact of their network deployment. Although infrastructure development formed part of Cornerstone, Vodafone and Telefónica have continued to actively compete in the telecommunications market place to retain and win mobile phone customers and both operators differentiate themselves on the quality of their customer experience. Although Vodafone and Telefónica share their infrastructure, they operate entirely independently as businesses with their own separate strategies and networks. Accordingly the key focus as part of Cornerstone was to build new sites which had the capabilities to provide coverage for both operators.</p> <p>A retained base station site is required in this location in order to maintain existing network coverage and capacity, for both Vodafone and Telefónica, commonly known as O2.</p> <p>Details regarding the general operation of the Vodafone and Telefónica networks can be found in the accompanying 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. Supporting information can also be found in the attached CTIL document called 'Radio Planning and Propagation', which discusses how radio networks are planned, the need for height and the limitations associated with the technology.</p> <p>Furthermore the new Code of Best Practice on Mobile Phone Network Development published by the Mobile Operators Association (MOA) 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.</p>

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

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 Telefónica and 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

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 with the fact that the subject site does not sit within a restrictive planning policy area, 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 both Telefónica and Vodafone and that can be upgraded with only minimal works so as to address this requirement.

This proposal makes use of an established mast site and will allow for two operators to address their current coverage requirements via a single base station.

The proposal is to replace the existing mast with a mast of similar dimensions. The new pole will also be coloured black as per the existing installation. 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.

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 "*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. It identifies the common use of street furniture as suitable forms of development and acknowledges designs, which are intended to resemble street lampposts and telegraph poles.

Planning Assessment

From the outset, it should be appreciated that irrespective of the installation's use as a telecommunications base station, the change in form of an existing tall structure 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 or a development's height and design does not automatically result in an overwhelming adverse harm. Similarly, it should be acknowledged that the presence of the existing telecommunications installation on-site might 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 mast. 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's siting and appearance.

In light of the above it is considered that the 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 other material planning matters. Indeed it should also be ascertained as to whether there is still a need for the base station and if there have been any notable changes in terms of the development's site specific siting and surroundings. In addition, the latest 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 when comparing the appearance of the existing

installation with the proposed scheme, it is considered that the latest upgrade development will not undermine the visual amenity of the area. In this respect balanced against the other matters as below, it is considered that the latest CTIL proposal 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 Telefonica and Vodafone.

It should be acknowledged that a sequential approach to site selection has been taken, whereby the proposal seeks to replace an existing ground based installation found at the application site. It should therefore be acknowledged that the proposed column would not add to the existing clutter of street furniture, as the proposal is a direct replacement for that which already exists on-site. Taking into account the residential nature of parts of the wider area, it is considered that this stretch of Grafton Road remains an appropriate stretch of adopted highway controlled land to site a streetworks style proposal. The scheme would be positioned on a wide stretch of pavement, which allows for unimpeded pedestrian and vehicular movements. In light of the above, it is considered that the upgrade proposal would not be overly intrusive in the street scene and its visual impact would not outweigh the continued need and future 4G demands to provide coverage.

It is recognised that the now existing base station was determined prior to the adoption of the aforementioned NPPF. 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 has derived from PPG8, which was applied in the first instance. 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 applicable, it is considered that the proposal accords with the Council development plan.

In light of the above, the applicant considers that the 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. Telefónica and Vodafone as operators are 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

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