## SUPPLEMENTARY INFORMATION

1. Site Details

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|---|---|---|---|
| Site Name: | Greater London House | Site Address: | 180 Hampstead Road, London NW1 7AW |
| NGR: | 529120, 183343 | | |
| Site Ref Number: | MTR028 | Site Type:[1] | Macro |

2. Pre Application Check List

**Site Selection**

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|---|---|---|
| Was an LPA mast register used to check for suitable sites by the operator or the LPA? | | Yes |
| If no explain why: | | |
| Was the industry site database checked for suitable sites by the operator: | | Yes |
| If no explain why: | | |

**Annual roll out consultation with LPA**

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|---|---|
| Date of last annual rollout information/submission: | Sent to LPA 7/10/2013 by email |
| Name of Contact: | Gavin.Polkinghorn@camden.gov.uk<br>neil.storer@camden.gov.uk |
| Summary of outcome/Main issues raised: | None in relation to this existing base station location. |

**Pre-application consultation with LPA**

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|---|---|---|
| Date of written offer of pre-application consultation: | 6/8/2014 | |
| Was there pre-application contact: | | No |
| Date of pre-application contact: | | |
| Name of contact: | | |
| Summary of outcome/Main issues raised: Letter explaining the proposed upgrade and plans sent to the LPA on 6th August. No response received at time of application. | | |

[1] Macro or Micro

**Ten Commitments Consultation**

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| Rating of Site under Traffic Light Model: | Green | | |
| | | | |
| Summary of outcome/Main issues raised: | | | |

**School/College**

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| Location of site in relation to school/college:There are no schools within reasonable distance of the site |
| Outline of consultation carried out with school/college:<br>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)**

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

**Developer's Notice**

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|---|---|---|---|
| Copy of Developer's Notice enclosed? | | Yes | |
| Date served: | 25.9.2014 | | |

3. Proposed Development

| The proposed site: |
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| The application proposal relates to an existing Airwave base station at Greater London House, 180 Hampstead Road, London NW1 7AW<br><br>Following a review of technical requirements it is now proposed to install an additional dish antenna shown on the enclosed drawing nos. GA-01, GA-02, GA-03, all Rev A. The proposed upgrade consists of<br><br>• The Installation of 1 x 300mm dish antenna onto the existing rooftop on a new pole at 29.8m above ground level<br><br>The development will not appear incongruous; given its discreet design and no external |

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| alterations to the support equipment are required. |

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| Enclose map showing the cell centre and adjoining cells: |
| N/a |

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| Type of Structure: | |
| Description: 1 x 300mm Airwave dish antenna | |
| Overall Height: 13m AGL | |
| Height of existing building | 28.3m |
| Equipment Housing: | |
| Length: | |
| Width: | |
| Height: | |
| Materials: | |
| Tower/mast etc – type of material and external colour: | grey |
| Equipment housing – type of material and external colour: | |

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|---|
| Reasons for choice of design: |
| This design solution is proposed as it will meet technical objectives with minimal visual impact. As can be seen from the submitted drawings, the proposed development consists of the installation of 1 x 300mm dish antenna on a new antenna pole mount. The development will not appear incongruous; given its discreet design. It is considered that the proposal is the best design for this location. The small antenna will have minimal impact upon the character and appearance of the conservation area. It strikes the best balance between impact and operational considerations. |

4. Technical Information

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|---|---|---|
| ICNIRP Declaration attached<br><br>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.<br><br>When determining compliance the emissions from all mobile phone network operators on the site are taken into account. | Yes | |

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| Frequency: | 4G 800 MHz Cellular band<br>2G/3G 900 MHz Cellular Band |

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|---|---|
| | 2G 1800 MHz Cellular Band<br>3G 2100 MHz Cellular Band<br>4G 2600 MHz Cellular Band |
| Modulation characteristics[2] | GMSK for 2G (GSM) antennas or QPSK for 3G (UMTS) antennas. |
| Power output (expressed in EIRP in dBW per carrier)<br><br>In order to minimise interference within its own network and with other radio networks, Vodafone operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision<br><br>As part of Vodafone's network, the radio base station that is the subject of this application will be configured to operate in this way.<br><br>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.<br><br>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. | 32 dBW |
| Height of antenna (m above ground level) | 29.8m |

5. Technical Justification

| Reason(s) why site required e.g. coverage, upgrade, capacity (map attached if required): |
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| The addition of this single dish antenna will allow Airwave Solutions to successfully update the mode of transmission from cable to wireless transmission links. The current method used to connect sites in the network is now struggling to cope with the demands of modern day mobile phone usage. Updating to a wireless link will improve quality of service to our emergency |

[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

services clients by increasing bandwidth, which allows greater volumes of data and voice traffic to be sent across the network.

I'm sure you will appreciate that mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work.

The importance of mobile technology in the UK was recognised in the August 2011 report by Ofcom, 'The Communications Market 2011'. Ofcom reported that at the end of 2010 there were 81.1 million active mobile phone subscribers in the UK (41.6 million pre-pay, 39.5 million monthly contract), an almost 50% increase in the number of active mobile subscribers since 2002. Ofcom also recorded that the demand for mobile services by the public, particularly their demand for 'smartphones' with 3G Internet access, is by far the most rapidly growing. The percentage of the UK population with an active 3G connection (internet enabled mobile phone, USB dongle, or data-card) has increased more than ten-fold since the end of 2004, when just 4.3% of the UK population had a 3G connection, to 53.2% at the end of 2010. Ofcom summarised this trend as one of the key market developments as follows:

*"The explosion in mobile data volumes. The increasing use of mobile broadband services via dongles and smartphones resulted in a 67% increase in data transferred over the UK's mobile networks in 2010..."*

It is for these reasons that the National Planning Policy Framework and the government's Plan for Growth initiative (see section 6 of this statement) place such emphasis on encouraging the continued rollout of digital infrastructure networks of which the proposed development will form a key part.

Further detail regarding the general operation of the network 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.

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

None as this represents a minor addition to an existing rooftop based base station.
The proposed installation is considered to be the best technical and town planning solution.
The dish antenna will not have any detrimental impact on the amenity of the conservation area.

Additional relevant information:

**Siting and Visual Impact Considerations**

This design solution is proposed as it will meet technical objectives with minimal visual impact. As can be seen from the submitted drawings, the proposed development consists of the installation of one dish antenna to be fixed to a new antenna pole. The development will not appear incongruous given its discreet design and it is considered that the proposal is the best design for this location. The small antenna will have minimal impact upon the character and appearance of the conservation area. It strikes the best balance between impact and operational considerations.

**Development Plan Policies**

B5 - Telecommunications
The Council will only grant planning permission for telecommunication development where consideration has been given to minimising harm to visual amenity and the environment. The Council will consider:
a) the appearance of the development including materials, colour, design, dimensions, overall shape, and type of construction, as well as alternative designs which may be more suitable for the building or environment;
b) the siting of the development, including the height of the building or site, its relationship to existing topographical features and natural vegetation, its effect on the skyline and views; and its relationship to conservation areas, listed buildings and residential properties;
c) the relationship of the development to existing telecommunications equipment, any technical constraints on the location and design and the cumulative impact of additional equipment on visual clutter;
Camden UDP Deposit Draft 2003 – Section 3 - Built Environment51
d) the effects on pedestrian and road safety;
e) the scope for landscaping and screening to reduce the impact of the development on its surroundings;
f) the scope for sharing of masts and sites and the opportunity to use existing buildings and other structures; and
g) self-certification to the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines.

The local policy also makes reference to how the national government level policy aims to facilitate growth of new and existing telecommunications systems while keeping environmental impact to a minimum. After investigating the relevant local policy for the proposal it is considered that the proposal adheres to all of the criteria set out.
The proposed upgrade development is of an existing telecommunications site and therefore meets both the national and local policy. By utilising an extremely discreet design on an existing building, the proposed development will have no discernible impact on local visual

amenity.

This application is accompanied by a valid ICNIRP certificate.

**National Planning Policies**

The National Planning Policy Framework (NPPF), which sets out the Government's national planning policies for England, was published on 27 March 2012. Paragraph 14 of the NPPF states that a presumption in favour of sustainable development lies at the heart of the planning system and, in respect of decision-taking, this means that development proposals that accord with the provisions of the Development Plan should be approved without delay. In the case of this application, the Development Plan does not contain any directly relevant policies and, therefore, the following guidance at paragraph 14 of the NPPF applies:

*"For decision-taking this means….*

*where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*

- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*

- *Specific policies in this Framework indicate development should be restricted."*

In our view, the proposal also accords fully with all relevant NPPF guidance and there are no reasons why the development should be refused prior approval or be restricted in any way. The proposed development is supported by paragraph 17, third bullet point, of the Core Planning Principles of the NPPF, which states that decision-taking 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…" (my emphasis).*

This theme is developed further in Section 5 'Supporting high quality communications infrastructure' of the Achieving Sustainable Development section of the NPPF (paragraphs 42-46) where the government sets out its objectives for national telecommunications planning policy.

Paragraph 42 emphasises that advanced, high quality communications infrastructure is essential for achieving sustainable economic growth and that high speed broadband and other communications networks, such as the proposed development and its role in Airwaves digital infrastructure network, play a vital role in enhancing the provision of a range of local community facilities and services. This central plank of government planning guidance for communications infrastructure is clearly supportive of the proposed development at the application site.

The proposal also accords with other key guidance contained in section 5 of the NPPF, namely:

- The installation of the proposed electronic communications apparatus meets national planning policy objectives of keeping the numbers of telecommunications masts and sites to the minimum consistent with network requirements (paragraph 43);

- The proposed siting and design of the development complies with the objective that equipment should be sympathetically designed and camouflaged where appropriate (paragraph 43);

- An appropriate level of consultation has taken place in advance of submitting the planning application (paragraph 44);

- An ICNIRP declaration is submitted (paragraph 45).

The proposed development also accords fully with the design guidance contained in section 7 of the NPPF. In this regard, the proposal is an acceptable design solution that is an entirely suitable development given the context of the application site: it, therefore, meets fully the guidance contained in paragraph 65 of the NPPF, which states that:

*"Local Planning Authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits)."*

In respect of this guidance, it has been demonstrated that the proposal will not have any significant visual impact, and it will not affect any heritage asset. It, therefore, follows that significant weight should be given to the need for the development in view of the wider socio-economic and sustainable development benefits of providing improved network coverage in this area, entirely in accordance with section 5 of the NPPF.

**The Plan for Growth and Ministerial Statement**

The 'Plan for Growth' report, published alongside the Budget 2011 announcement in March 2011, outlines the government's intention to refocus the planning system to include a presumption in favour of sustainable development, including measures to support the UK's digital infrastructure and mobile broadband communications networks. These objectives are now reflected in part in the NPPF.

The Plan for Growth is directly relevant to this application, as the proposal will enable Vodafone to improve their digital infrastructure services to the local area, including mobile broadband services, where there is currently a need to undertake upgrade works to the existing base station.

On 23 March 2011, the Minister of State for Decentralisation issued a statement on the Planning for Growth agenda that is a material consideration in the determination of this application. This statement included the following guidance:

*"...The Government's top priority in reforming the planning system is to promote sustainable economic growth and jobs. The Government's clear expectation is that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy..."* (Second paragraph); and

*"...When deciding whether to grant planning permission, local planning authorities should*

*support enterprise and facilitate housing, economic and other forms of sustainable development. Where relevant - and consistent with their statutory obligations - they should therefore:*

*(i) consider fully the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession...*

*(iii) consider the range of likely economic, environmental and social benefits of proposals; including long term or indirect benefits such as increased consumer choice, more viable communities and more robust local economies (which may, where relevant, include matters such as job creation and business productivity)...*

*(v) ensure that they do not impose unnecessary burdens on development...".*

The proposed minor upgrade to this established base station, which is an integral part of Airwave's network, is precisely the type of high-speed digital infrastructure that the Government is seeking to support as part of the presumption in favour of sustainable development. Moreover, the proposed updating to a wireless link will improve quality of service to our clients by increasing bandwidth, which allows greater volumes of data and voice traffic to be sent across the network to the benefit of the emergency services users.

Contact Details

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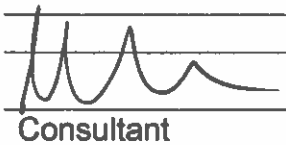
| Name: (Agent) | Matt Higgins | Telephone: | 07765 989699 |
| Operator: | Airwave Solutions | Fax no: | |
| Address: | | Email Address: | matt.higgins8@gmail.com |
| Signed: |  | Date: | 25th Sept 2014 |
| Position: | Consultant | Company: (on behalf of above operator) | Somerville (Cheshire) Ltd, Stanecroft, Jarvis Lane, Steyning BN44 3GL |