SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Rooftop 8 Anglers Lane	Site Address:	Rooftop at 8 Anglers Lane, Kentish Town, London, NW5 3DG
NGR:	E: 528879 N: 184770		
Site Ref Number:	CTIL_MET.144481_BCN.142411_VF_33490_TEF_44390	Site Type:[1]	Macro

2. Pre Application Check List

Site Selection (for New Sites only)
(would not generally apply to upgrades/alterations to existing sites)

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	No
If no explain why: Application is an upgrade to an existing site.		
Was the industry site database checked for suitable sites by the operator:	Yes	No
If no explain why: Application is an upgrade to an existing site.		

Annual Area Wide information to local planning authority

Date of information submission to local planning authority	6 October 2014
Name of Contact	Gavin.Polkinghorn@camden.gov.uk neil.storer@camden.gov.uk
Summary of any issues raised:	

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	12.03.2015
Was there pre-application contact:	No
Date of pre-application contact:	NA

[1] Macro

Name of contact:	NA
Summary of outcome/Main issues raised: No response to date.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	~~Red~~	~~Amber~~	Green
Outline Consultation carried out: Consultation with local Ward Councillors' for Kentish Town Ward – Cllr's Apak M, Gould G, Wells-Headlam J. Pre-application consultation letters and drawings of the proposals were sent to these parties on the 12.03.2015.			
Summary of outcome/Main issues raised: No consultation responses were received in response to the pre-application consultations.			

School/College

Location of site in relation to school/college: St Patricks Catholic Primary School, Holmes Road, London, NW5 3AH
Outline of consultation carried out with school/college: Pre-consultation letters and plans sent to the head teacher and chair of governors for the above school on 12.03.15.
Summary of outcome/Main issues raised: "Further to your letter of 12th March 2015, regarding the proposed alterations to a base station near St Patricks Primary School, could you please give us a written assurance that the proposed works will not in any way adversely affect our pupils, staff or buildings during or after the works" We responded on the 17th of March 2015 confirming that there would be no impact upon any of the staff or pupils at the school and that we have provided the requisite ICNIRP certificate within the application to ensure that the are no risks to public health. By which the school was happy with.

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?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		N/A

Details of response: N/A

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	21.4.2015	

3. Proposed Development

The proposed site:

Background

Telefónica UK Ltd has entered into an agreement with Vodafone Ltd pursuant to which the two companies plan to jointly operate and manage a single network grid across the UK. These arrangements will be overseen by Cornerstone Telecommunications Infrastructure Ltd (CTIL) which is a joint venture company owned by Telefónica UK Ltd and Vodafone Ltd ("the operators"). Due to the dramatic rise in the use of mobile data, the industry has had to consider new operating models that are efficient at delivering 3G and 4G services to a much larger percentage of the UK population, as well as supporting 2G services. Both companies pledge to close the digital divide between rural and urban areas targeting 98% indoor population coverage across 2G and 3G by 2015. The agreement will also lay the foundations for two competing 4G networks to deliver the capability for a nationwide 4G service faster than could be achieved independently.

The agreement allows both organisations to pool their basic network infrastructure, while running two, independent, nationwide networks allowing consumer choice. By doing this, they will both reach far more of the country far faster than they could achieve on their own. This single network grid will automatically increase each operator's footprint by 40%, adding competition and choice for customers in areas that previously only had one operator's coverage available.

Following agreement with the two operators, some ownership of the equipment will change to allow the commissioning of the proposed Multi-Operator Radio Access Network ("MORAN") required to deliver the single network grid. This will have little impact from a planning standpoint, however, it forms an important part of the agreement between the companies. It will also provide enhanced capacity for both operators' customers in the future, which will be especially important with the recent launch of the 4G networks. Therefore from a customer perspective they won't see any change as customers will continue to use each operator's network. This agreement is about consolidating infrastructure assets, clearing the way for innovation and the creation of new services that customers really want.

CTIL and Vodafone Limited are looking to progress works which will entail the upgrading of their existing rooftop radio base station site at 8 Anglers Lane, Kentish Town, London, NW5 3DG.

The proposal is to upgrade the site to enable a single network grid supporting modern MORAN technology for both Vodafone Limited and Telefónica UK Limited. The site will be operated by CTIL and Vodafone Limited but the upgrade will enable both operators to provide future MORAN services from the existing site on the roof of the existing building at 8 Anglers Lane. It should be noted that the building is within the Inkerman conservation area.

The site is located on the south west side of Anglers Lane. The building is of a residential use and is within a Conservation Area. The area is predominantly of a mixed-use being made up of both commercial and residential buildings. The predominant uses in this area are shops/services and living accommodation.

The existing radio base station is located on the roof of 8 Anglers Lane and comprises of 6 no. antennas and 2 no. RBS 2106 cabinets and 1 no. RBS 3101 cabinet and Nokia flexi modules. The existing cabinets and antennas and flexi modules are all finished in a grey colour.

The streetscene in the main has high rise buildings up to a similar height of the building which is the subject of this application. The area is of an urban nature and has a number of linear features such as street furniture, lighting columns, general signage, some mature trees and hedges.

Enclose map showing the cell centre and adjoining cells:

This is an upgrade to the existing site to fundamentally enable the operators to jointly operate and manage a single network grid across the UK, using MORAN technology, in accordance with the CTIL joint venture arrangements.

Type of Structure: Upgrade to existing rooftop installation

Description:
The proposed development relates to the installation of a radio base station consisting of the removal of existing 6 no. Vodafone and Telefonica antennas to be replaced with proposed 9 no. new antennas (height to top 19.8m). The removal of existing Vodafone RBS 2106 cabinet to be replaced with proposed Vodafone Integrated Services cabinet (600x500x1645mm high) on mesh platform and removal of existing RBS 2106 and RBS 3101 cabinet to be replaced with proposed 2 no. Vodafone RBS 6102 cabinets (1300x700x1450mm high) as well as, the removal of existing Telefonica Nokia Flexi modules mounted on pole to be replaced with proposed Telefonica BTS flexi stack (600x300x1778mm high) on new support steelwork and ancillary development thereto to include the addition of proposed 6 no. Remote Radio Units (RRU's) and removal of existing plywood panels to be replaced with proposed GRP panel in front of the antennas.

It is of note that the proposals seek to upgrade the existing base station in this location. The latest proposal accommodates both operators' antennas at a top height of 19.80m which is no higher than the existing and an underside height of 18.40m which is also no higher than the existing and an undersight height of 17.80m which is slightly lower than the existing, making the antennas marginally longer.

The development at this location also includes the installation of 3 no. equipment cabinets. Two of the equipment cabinets (RBS 6102) are replacement cabinets and will replace the equipment cabinets which are proposed to be removed on the mesh platform to the north west and south east. The dimensions of the 2no. RBS6102 cabinets are 1300mmx700mmx1450mm which equates to 1.31m^3 each.

While the other equipment cabinet (TSC cabinet) will also be a replacement cabinet located to the center of the mesh platform and the dimensions of which are 600mmx500mmx1645mm which equates to 0.49m^3. The equipment will be treated in the same colour as the existing which is grey.

Height of existing building: Rooftop	20.10 Metres
Equipment Housing: Ericsson RBS 6102 (x 2)	
Length:	0.700 Metres
Width:	1.300 Metres
Height:	1.450 Metres
Equipment Housing: Tyrone Fabrications ISC Cabinet	
Length:	0.500 Metres
Width:	0.600 Metres
Height:	1.645 Metres
Materials: As existing	
Tower/mast etc – type of material and external colour:	Rooftop installation upgrade
Equipment housing – external colour:	Grey – as existing

Reasons for choice of design:

The operator has occupied this site for a number of years. comprises of 6 no. antennas and 2 no. RBS 2106 cabinets and 1 no. RBS 3101 cabinet and Nokia flexi modules. The antennas have a top height of 19.80 metres. Whilst this installation provides 2G/3G Vodafone coverage to the immediate area, the upgrade is required to allow the two companies to operate and manage a single network grid across the UK using MORAN technology, as well as allowing each operator to increase their overall footprint by 40% nationally, it will also enable future 4G into the network.

The use of MORAN technology will allow the operators to increase their national footprint and enable future 4G technology. To achieve this an upgrade to the existing equipment is necessary which will allow the required MORAN technology within an existing albeit slightly upgraded installation. This will be able to accommodate all technologies within one existing installation. This is favourable to creating a new installation in a different location within this cell area. This avoids a proliferation of telecommunication equipment whilst ensuring the expansion and improvement of the electronic communications network including telecommunications and high speed broadband.

It is acknowledged that the equipment cabinets are slightly smaller than those which currently exist, and the antennas would be slightly longer but the overall top height would not increase. As the installation is on the rooftop of a 4-storey building, surrounded by other similar sized buildings in a heavily built up area it is not considered that the site would be highly visible from ground floor level. The proposed equipment would be coloured to match that which currently exists on the site thereby not appearaing significantly different to the existing equipment.

The improved equipment housed within the new cabinets are ancillary to the functionality of the proposed antennas, thus rooftop equipment is justified. The upgraded installation will have an appearance similar to the existing, code system operators'. It is considered that the rooftop development will not have a detrimental impact on the visual amenity of the area and through appropriate painting will assist in blending effectively with its surroundings.

Given the height of the building it is considered unlikely that the upgraded equipment would be highly visible from ground level. Given the urban and highly built up nature of the area the visual impact would be minimal. The installation would not be visible to highway users as it is situated some 20.10 metres above ground level of the rooftop. It is appreciated that the site may be visible from surrounding buildings but the majority of these are commercial in nature and therefore there would be no loss of residential amenity, nor any significant visual loss of visual amenity to the established Inkerman Conservation Area.

The technical requirements of mobile communication operators such as the applicant are acknowledged in the National Planning Policy Framework which states that local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband.

In address of the appearance of the proposal, it is believed that the scheme takes a form which is sympathetic within the context of its immediate street scene which includes existing high rise buildings and urban furniture.

Aware that some standard telecommunication equipment can appear incongruous, it is highlighted that the antennas would remain at the same top height as the existing and would also remain concealed within a shroud. From ground level the equipment would not be visible

and would not affect the safety or amenity of any users of the highway whether they be pedestrians or motorists. This is due to the equipment cabinets being housed within an equipment building.

Placing masts near similar structures and utilising simple and unfussy designs is acknowledged in the 'Code of Best Practice on Mobile Network Development in England' to be less likely to dominate and be in discord with the landscape and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area. This design is considered to be an appropriate solution and shows the applicants efforts to help mitigate the proposals impact on the visual amenity, whilst also ensuring that proliferation of masts are reduced by the utilisation of existing structures by two operators as outlined within NPPF.

In light of the operators' efforts to design the best solution for this particular site so as to minimise the impact of the development on the environment, it is considered that the appearance of the replacement column would not seriously impact on the visual amenity of the area, nor would it form an obtrusive feature within the streetscape.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the MORAN technical requirements for the site. Taking all matters into account it is considered that this proposal to deliver the capability for a MORAN service for two competing operators from a single network installation, would not appear out of place within the street scene.

4. Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance the emissions from all mobile phone network operators on or near the site are taken into account.	Yes	

Frequency:	2G 900MHz and 1800MHz, 3G 900Mhz and 2100Mhz and 4G 800Mhz

Modulation characteristics[2]	2G (900 or 1800) – GMSK 3G (900 or 2100) – QPSK 4G (800) - QAM
Power output (expressed in EIRP in dBW per carrier)	800 MHz 31dBW 900 MHz 32 dBW 1800 MHz 32 dBW 2100 MHz 35 dBW
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 network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.	

5. Technical Justification

Reason(s) why site required e.g. coverage, upgrade, capacity:
A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the county. So, if a person is on the move, the network will transfer their calls from one site to the

[2] The modulation method employed in 2G (GSM) is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase modulation
The modulation method employed in 3G (UMTS) is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation
The modulation method employed in 4G (LTE) is 64 QAM (Quadrature Amplitude Modulation) which is another form of Phase Modulation

next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

The distances between transmitter sites will depend on many factors, including the geography of the mobile services. There is a specific requirement for an upgraded radio base station at this location to allow the two companies to operate and manage a single network grid across the UK using MORAN technology, including the opportunity for future 4G service.

This single network grid will automatically increase each operator's footprint by 40%, adding competition and choice for customers in areas that previously only had one operator's coverage available and is a principal reason for the proposed upgrade.

Additionally, laying the foundations for a 4G system that provides mobile ultra broadband internet access, e.g. to laptops with USB wireless modems, to smartphones and to other mobile devices, is desirable. 4G provides superfast mobile broadband and will provide better, faster and more reliable mobile broadband connection according to Ofcom's Chief Executive. OfComs Chief Executive also acknowledges that down load speeds will initially be at least 5 to 7 times faster than existing 3G networks.

The National Planning Policy Framework states at paragraph 46 that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt, the proposed installation is needed for both companies, via CTIL to operate and manage a single network grid across the UK using MORAN technology.

The Government has expressed its commitment to the UK having the best superfast broadband network (i.e. those services with a headline speed of 30Mbit/s or more) by 2015. It also wants superfast broadband networks to be available to 90% of homes and businesses.

According to OfComs Communication Marketing Report 2013 it found that the proportion of homes which accesses the internet or web-based services over a mobile network increased by 8% in the last year to 50% mainly due to the increasing smartphone take-up (i.e. phones which are specifically designed for the consumption of internet-enabled services such as websites and mobile applications). At the same time the use of email, social networking sites and instant messaging services all increased. Ofcom estimates that the number of subscribers who accessed the internet from mobile phones increased by nearly 9 million in 2012.

In the first quarter of 2013, 49% of UK adults accessed the internet using a mobile phone, a 10% increase on last year. Three quarters of those aged 16-34 said they accessed the internet using a mobile. The report found that people in the UK spent an average of over one day a month using the internet over a mobile network or a fixed internet connection PC in 2012. During 2012, the average time spent using a mobile data connection increased by 8 minutes a day (6%). The report also found that an average household spend on mobile services increased by 3.4% largely as a result of the growing use of mobile data services (i.e. smartphones).

The growth in smartphone take-up has resulted in increasing use of mobile data services. The percentage of mobile users who used their handset to access emails, download applications

and send and receive instant messages has at least doubled over the last two years to 36%, 29% and 26% respectively in the first quarter of 2013. It has become so popular that the number of voice calls has been overtaken by such mediums as email, texting and social networking sites. Indeed, 47% of all mobile users accessed their mobile in the first quarter of 2013, up from 28% in 2011.

Ofcom Research 2013 reported that 66% of mobile data users who access the internet do so equally inside and outside the home. The location of most mobile broadband use outside the home is when travelling (25%), at someone else's house (22%) and indoor public spaces (18%).

According to Ofcom research conducted in April 2013, 30% of smartphone users intend to upgrade to 4G at the end of their current contract. The most commonly cited reason for wanting a 4G service is speed. 73% of smartphone owners said they wanted a 4G service for quicker download speeds and 59% said they wanted 4G to enable faster streaming. The second most commonly cited reason for a 4G service was the reliability of the data service to take advantage of 'improved data coverage' and a 'more reliable data connection'.

The Ofcom Report found that it is likely that faster mobile data networks will contribute to further increases in average data consumption and 44% of smartphone users questioned by Ofcom in April 2013 said they would use their handset more if their mobile data connection was faster. The Report stated that data collected by BillMonitor, a company that aims to help subscribers to analyse their mobile bills and find suitable tariffs, showed that consumers' use of mobile data increased at an annual rate of 70%.

As such, the need for indoor 3G coverage is becoming ever more necessary and significant and the new 4G networks will become increasingly relevant in the coming months as the network is rolled out across the country.

The area within which an installation needs to be established in order to meet the coverage requirement is constrained by the location and extent of the coverage provided by existing installations in the surrounding area. The proposed scheme utilises an existing established radio base station installation which will be upgraded to provide a single grid network using MORAN technology. This will enable the operators to meet their efficiency, capacity and ever increasing technical capability requirements within a single grid network.

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 authority in understanding any technical constraints on the location of the proposed development.

6. Site Selection Process – alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

In accordance with the licence obligations and advice in the National Planning Policy Framework and the Code of Best Practice in England the applicant's network rollout team investigated the following siting and design options using this sequential approach to site selection:

- Upgrading their own existing base stations;
- Using existing telecommunications structures belonging to another communications operator. i.e. Mast and/ or site sharing, co-location;
- Installations on existing high buildings or structures including National Grid pylons;
- Using small scale equipment; and finally
- Erecting a new ground based mast site – (1st) Camouflaging or disguising equipment. (2nd) A conventional installation e.g. a lattice mast and compound.

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution. New sites are only developed where there are no viable or accessible alternatives or it is the local planning authority's preferred approach. The feasibility of the acquisition, build and maintenance of the site also needs to be taken into account.

In accordance with the above sequential approach, and in line with the principles of pooling the two operators existing network infrastructure to create a single network grid, the proposal is to upgrade the existing base station in this location.

Site	Site Name and address	NGR	Reason for not choosing
N/A	N/A	N/A	N/A

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

As referred to above, the applicant has taken a sequential approach and is seeking to redevelop an existing installation to enable a single grid network using MORAN technology to service to the local surrounding area. It is considered that utilising an existing established radio base station installation is preferable to pursuing a second base station within the immediate vicinity, as it would reduce the visual impact therefore preserving the character and amenity of the area. Given the makeup of the area and the siting of existing telecoms infrastructure on the site, it was established that the upgrading of facilities through the use of existing infrastructure would be the most viable solution. Based on this sequential approach no other sites have been considered.

Land Designations: The site is within the Inkerman Conservation Area and the scheme fully meets the policy requirements as shown in the paragraphs below.

Additional relevant information (planning policy and material considerations): N/A

Siting:

The site is located within a largely built up area and within an residential/commercial environment. The site is nestled on the rooftop of a residential building, surrounded by buildings of a similar height. As previously outlined the building is within the Inkerman Conservation Area.

The antennas and RRU's have been sited on the rooftop some distance away from the main road, whereby their presence will not impair the visibility or safety of passing motorists or pedestrians. The antennas and RRU's are proposed to be painted in a grey colour to match the existing antennas already in place. This will further ensure the antennas and RRU's will not appear overly dominant in this location.

The site is located close to a mainly commercial area, albeit there are some residential properties within the cell area. This is where the operators need to provide the best MORAN service provision. Utilising an existing established radio base station and installing a replacement cabinets and antennas at a similar height and having a similar appearance to the existing installation will reduce the number of base stations required and meets with the requirements for minimising the number of radio base stations as set out in NPPF and the Council's Local Plan. It is therefore beneficial as it will mean that an additional base station will not be required for these two operators within this cell search area.

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

Visual appearance:

The need for additional structures will be kept to a minimum through the removal and replacement of the existing antennas and installation of RRU's on the site. However, the operator recognises the need to minimise the visual impact of any new structure on the site. The proposed antennas are the thinnest and smallest possible in order to house MORAN technology on the same structure, thus allowing both operators to utilise the same apparatus having a similar appearance.

Although the height of the replacement antennas are the same they are essential to fit the MORAN technology into the structure, allowing both operators to utilise the same apparatus. If the antennas and RRU's were any slimmer then the multiple MORAN technologies would not be able to fit within the same structure and an additional column would be required, which would lead to the proliferation of masts, contrary to national and local planning policy.

The replacement antennas and new RRU's are required in order to accommodate both operators' antennas and feeders within the same structure at a height which continues to allow clearance of surrounding natural and built features. This will allow the required improvements to network coverage to be provided. As the antennas are a similar type to the ones they replaces, thus the impact on visual amenity within the streetscene will not be detrimental.

The proposed colour of the antennas will match the existing antennas in place as well as the RRU's being the same colour to blend in with what is already in place, which will be grey.

In light of the operator's efforts to design the best solution for this particular site so as to minimise the impact of development on the environment, it is considered that the appearance of the replacement column would not seriously impact upon the visual amenity of the area, nor would it form an obtrusive feature within the streetscene.

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

It is not necessary to quote extensively from this document but the following points are highlighted.

National Planning Policy Framework (March 2012)

The governments National Planning Policy Framework (NPPF) was published on 27 March 2012 and consolidates the majority of planning policy documents into a single circular (including PPG8, and PPS1). The Government's latest thinking strongly supports communications infrastructure. Paragraph 42 of the framework document sets out the objectives of the Communications Infrastructure. It states that '*advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services*'.

Paragraph 43 states that '*Local Planning Authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband*'. It goes on to acknowledge that the numbers of radio and telecommunications masts and the sites for such installations should be kept to the minimum consistent with the efficient operation of the network. The NPPF supports the use of existing masts, buildings and other structures, unless the need for a new site has been justified. It goes on to state that where new sites are required, the equipment should be sympathetically designed and camouflaged where appropriate.

NPPF paragraph 46 sets out a clear message to local planning authorities on health issues and the need for telecommunications systems. It states that '*local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure*'.

Throughout the NPPF there is strong support for sustainable development which is summed up in paragraph 14 which states 'At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. For decision-taking this means:

- Approving development proposals that accord with the development plan without delay; and

- Where the development plan is absent, silent or relevant policies are out-of-date, granting planning 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.

Section 7 of the NPPF sets out the requirement for good design and states at paragraph 56 that '*the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people*'. Paragraph 65 goes on to state 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*'.

The NPPF sets out 12 core principles which should underpin plan-making and decision-making these principles include that every effort should be made objectively to identify and meet development needs of an area, and respond positively to wider opportunities for growth (para 17).

Annex 1 of the NPPF sets out the implementation of the NPPF and advises in paragraph 214 that for 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 [in development plan documents adopted in accordance with the Planning and Compulsory Purchase Act 2004]. Paragraph 215 goes on to state that in other cases and following this 12-month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with this Framework (the closer to the policies in the plan to the policies in the Framework, the greater the weight that may be given).

Code of Best Practice on Mobile Phone Network Development in England (July 2013)

The Code of Best Practice provides guidance primarily to mobile network operators, their agents and contractors and to local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2002).

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure is achieved in a timely manner, but in a way that also minimises the potential impact that can be associated with such development. It provides clear and practical advice to ensure the delivery of significantly better and more effective communication and consultation between operators, local authorities and local residents.

The Code highlights that the mobile telecommunications network is a crucial piece of national infrastructure in both economic and social terms. It acknowledges that the pressure on networks to upgrade and improve networks through changes to existing sites and the development of new sites is constant. With the increasing consumer demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity. This is due to the ever increasing demand for data hungry applications to be available to a range of connected devices, such as smartphones and tablet computers. However, The Code notes that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which they rely.

The Code acknowledges that the operators anticipate largely using existing network infrastructure for the provision of 4G services and are similarly upgrading their 2G and 3G network infrastructure to improve capacity and coverage. However, the Code goes on to state that this does not mean that there will not be a need for new base stations. More base stations will be needed in areas where there has previously been only limited or no coverage, and where coverage and capacity needs to be enhanced in line with Government Policy and customer demand or where sites have been lost for example due to redevelopment.

Mast and site sharing continues to be supported within both Government policy and the Code of Best Practice. The Code acknowledges that shared sites will tend to be slightly bigger, but fewer sites will be needed overall to improve coverage and capacity. The Code acknowledges that sharing of sites is now the norm, and network operators now share much of their network infrastructure via joint venture commercial arrangements.

Due to the character of the cell area being commercial in nature, the applicant has sought to keep the installation upgrade as similar to the existing installation in terms of appearance, colour and location. The increase in size of the installation is required to house the new technologies whilst still maintaining an acceptable appearance and not having a detrimental impact upon the South Shoreditch Conservation Area.

The Code provides guidance on siting and design at Appendix B and continues to acknowledge that camouflaging or disguising equipment is considered materially appropriate with more modern masts frequently able to blend into their surroundings far more effectively than some of the older masts. In reducing the environmental and visual impact of the installation the Code of Best Practice promotes the use of simple and uncomplicated designs. *"Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts."* In this regard, the proposed antennas would be similar to those already in situ and would not be significantly increased in size. This will ensure that the environmental and visual impact of the equipment remains low, In addition to this rooftop installations the building is 5 storeys in height thereby not highly visible from the street.

Concerning roof top installations; The Code provides examples of where the environmental and visual impact of the mast can be greatly reduced.

- *Placing the mast near similar structures. For example, industrial and commercial premises, road signs and lamp posts;*
- *Using simple and unfussy designs. Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts; and*
- *Appropriate colouring.*

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "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"

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The Development Plan as defined by the Planning and Compulsory Purchase Act 2004 for Camden Council currently comprises the following documents:

- The London Plan: Spatial Development Plan for Greater London, February 2008 which comprises the Spatial Development Strategy for Greater London;
- Draft Camden Local Plan (2015)
- Camden Core Strategy, Novemeber 2010
- Camden Development Policies, November 2010

Relevant Policies of the London Plan

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. Paragraphs 1.58-1.60 'Impact of new technology' of the Plan recognises the growing strategic importance of new communications technology services, such as 4G coverage, will help to deliver:

1.58 – Transactions using increasingly sophisticated communication technologies have grown enormously, affecting every aspect of everyday life. E-tailing, e-commerce and e-government are all likely to have an impact on London and its place at the core of local networks. This plan addresses issues of the digital divide between those who have and do not have access to the new technologies, distinguishing between the needs of commerce and residents. Economic and population growth in higher density, intensive development will make it more economical to ensure the provision of broadband and new technologies.

1.59 – In the emerging information society, London will need to become increasingly a learning city in which skills and the ability to use information will be essential. This will place heavy demands on education and training resources.

1.60 – Finally, information technology will add to the flexibility of home and work environments, but will not replace the need for regular face-to-face meetings. It may lead to work journeys being spread over a longer part of the day, and to more local journeys being made, for example to services and cafes.

In this regard, the proposal to upgrade the existing Vodafone installation at 8 Anglers Lane, meets with this planning strategy for Greater London and will facilitiate many of the requirements which this strategy has been designed to provide for the residents of Greater London.

Draft Camden Local Plan (2015)

Camden council is reviewing its main planning policies (in the Local Development Framework (LDF) to produce a new local plan. The consultation on the draft local plan was till the 17th of April 2015. After this consultation comments will be considered and a further draft is expected later in 2015 before which submitting it to the government for the public examination by a Planning Inspector in early 2016. From this the Draft Camden Local Plan does not hold any significant weight. However under 5.12 The Council recognises the importance of digital infrastructure in enterprise development and expects electronic communication networks,

including telecommunications and high speed broadband, to be provided in employment premises.

Adopted Camden Core Strategy (November 2010)

The Camden Core Strategy was adopted on the 8th of November 2010. The policies within the Core Strategy superceded some of the UDP policies, but does not contain any relevant telecommunications policies to guide such development. However it is noted that Core Strategy Policy CS1 – Distribution of Growth, supports the achievement of sustainable development in Camden, while continuing to preserve and enchance the features that makes Camden such an attractive place to live, work and visit, with concentration to highly accessible locations including that of Kentish Town by where the site lies. (see policy CS1).

One of the objectives of the Core Strategy is to sustainably manage growth so that it takes place in the most appropriate locations, meets our needs for homes, jobs and services and properly takes into account Camden's character as a highly developed inner London borough with many valued and high quality places.

While another objectives states to support and encourage the provision of the faciltities and services needed to meet the needs of Camden's communities and finally to promote safety and security of those who live in, work in and visit Camden, while maintaining the boroughs vibrancy. All of which the above are met through the telecommunications upgrade contributes too.

What also relates to this development is Policy CS14 – Promoting high quality places and conserving our heritage. As already stated the building being within a conservation area. This policy states the council will ensure that Camden's places and buildings are attractive, safe and easy to use
by:
a) requiring development of the highest standard of design that respects local context and character
b) preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;
c) promoting high quality landscaping and works to streets and public spaces;
d) seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible;
e) protecting important views of St Paul's Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting important local views.

Camden Development Policies (Novemeber 2010)

The Camden development policies were adopted on the 8th of Novemeber 2010 and set out detailed planning criteria that is used to determine applications for planning permission in the borough. However like the Adopted Camden Core Strategy (2010) it does not contain any relevant telecommunications policy to guide development. Although in reference to conservation areas Policy DP25 – Conserving Camden's Hertiage which pro-actively promotes Policy CS14 of the Core Stategy states for conservation areas:

In order to maintain the character of Camden's conservation areas, the Council will:

a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;
c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.

Planning Assessment

Having taken the contents of the policies into consideration, the proposal for the upgrading of the existing installation 8 Anglers Lane fully meets with the requirements of the NPPF and the aspirations of the Core Strategy and Development Policies. The requirement for the additional capacity and coverage is urgently required and the operator is meeting with national guidelines in that they are sharing an existing installation and the upgraded equipment is sited on an existing building. Furthermore, the proposed development has been designed with the sensitivity of the area in mind whereby the antennas and RRUs are located away from the main elevation of Anglers Lane, set within the roof top away from the edge of the building and as such the building mass of the host property will help shield the RRUs and new antennas from appearing prominent in the streetscene, whilst the additional equipment cabinets will be located internally in an existing equipment room. As such, they are not visible to passers-by or nearby properties therefore ensuring the visual amenity of the area is not impaired. As such the proposals are in line with the NPPF and the Core Strategy objectives and policies CS1, CS14 and DP25.

The upgraded installation will meet the aspirations of the NPPF which encourages the use of sympathetic design to minimise the impact of the development on the environment as well as the utilisation of existing masts. It also complies with Core Strategy Policies CS1, CS14 and Development Policy DP25.

Furthermore visual amenity will not be impaired and the setting of the conservation area will be preserved and their character maintained due to the antennas being replaced and the RRU's discreetly being positioned externally. Internally the equipment cabinets will be located in an existing equipment room. As such, they will have no impact on the conservation area or their setting and will respect the local context and character. As a result, the proposed design and location fully accords with the Code of Best Practice, the NPPF and Development Policy DP25 and Core Strategy Policies CS1 and CS14.

The proposed replacement and additional antennas, new RRUs and equipment cabinets fully comply with national guidance contained within the NPPF. Government guidance states that in order to limit visual intrusion the number of radio and telecommunication masts and the sites should be kept to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need of a new site has been justified [NPPF para 43].

The application site is an established telecommunications radio base station. Given that the proposal is to replace the existing site with one capable of allowing the operator to continue

to operate from the same site, then this is in accordance with the NPPF and The Code of Best Practice. This offers the best environmental solution, limiting the amount of new sites required in this sensitive area, limiting the visual intrusion in the area. For the avoidance of doubt, the existing antenna design would not be able to support the operator's upgrade requirements and all their multi-technologies on the same structure.

The principle of a telecommunications base station installation in this location has already been accepted by the Council and become part of the established streetscene. The proposed upgrade to the existing site is sequentially the most preferable option. The operator is looking to upgrade its existing installation to primarily enable Vodafone to meet the existing and future demands of mobile users. In this respect its continued presence and operation is essential in providing additional network coverage/capacity for Vodafone and new 4G services in to this cell area. Given that a sequential approach to site selection has been undertaken, whereby the proposal seeks to replace the existing antenna configuration on the established telecommunications site, it should be acknowledged that the proposed works would have limited impact on the townscape as it will continue to be shielded from view from the nearby major roads. Taking into account the mixed use character of the area including retail shops, businesses, a church and residential properties in the nearby locality, it is considered that siting the antennas on this rooftop well away from public contact remains an appropriate location to site the new antennas. The radio base station is set well back from the main highway set in from the roof edge with some of the antennas being located towards the rear of the host property. There are also other buildings of a similar height to the east and west, therefore the antennas will not vastly stand out in terms of view to passers-by walking along Anglers Lane. The proposed upgrade would not be intrusive in the street scene and its very limited visual impact would not outweigh the need and future telecommunication coverage/capacity demands within this locality. The design of the new antennas will be as similar as possible to the existing antennas in both height and diameter terms to minimise the impact on the surrounding area.

The design chosen is one of the most sensitive designs available to the operators' to utilise the same site, making efficient use of land and enabling the latest technologies to be provided to the cell area. It is also located where there currently is an established telecommunications installation in the same location as the existing antennas. There are also several other linear structures within the immediate area including street trees. As such, the setting and character of the conservation area will continue to be preserved.

In line with policies CP14 and DP25, the new antennas and RRUs will respect the local character, including the relationship to the existing townscapes and frontages, scale, height, massing, proportions and form. The proposed antennas will remain at a top height 19.80m above ground level and will be located in the same positions as the existing antennas which are proposed to be removed. They will be of a similar design, size and shape and therefore will have a similar appearance to the existing antennas already in situ. As such they will continue to respect the scale, height, massing, proportions and form of the existing built development in the surrounding area. For the same reasons, the new antennas and RRUs will also comply with the Council's Core Strategy objective to retain the character and appearance of the area. Due to the discreet siting of the new antennas on the rooftop of the host building some distance from ground level the building mass of the host property will ensure that this listed building and the surrounding Inkerman Conservation Area will remain preserved and unduly affected by the upgrade to the existing installation. Core Strategy Policy CS1 will also be fully complied with in as much as the layout, form, scale and materials used will not be out of character with the surrounding area. The layout of the replacement antennas will be the same as the existing antennas as they will be located in the same position, they

will be of a similar form as the existing antennas already in situ and the scale of the antennas will be very similar. The new antennas will be the same height as the antennas they replace in the same location and the materials used will resemble as closely as possible those which are proposed to be removed. Therefore the installation fully complies with Policy CS1, CS14, Core Strategy objectives and policy DP25 of the development policies. As a result the new antennas and RRUs will not appear obtrusive within the area.

The Government fully supports high quality communications infrastructure. NPPF states at paragraph 43 that local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. It acknowledges that high quality communications infrastructure is essential for sustainable economic growth. The NPPF also highlights that the development of high speed broadband technology also plays a vital role in enhancing the provision of local community facilities and services. It is noted that one of the Council's Core Strategy objectives seeks to ensure that services and infrastructure needed by the community are available and accessible to all. This is enshrined in Policy CS1 which ensures sustainable growth. This upgrade will fully meet this objective and Core Strategy Policy CS1 to ensure it is implemented.

The proposal will help to meet the license obligations and continue to meet the reasonable customers' demands which include being able to access their mobile phone whenever and wherever they are. The replacement installation will continue to enable the operator to provide a high quality service to its customers and access to the latest technologies. An installation located outside this search area would not allow the operator to provide their desired level of coverage and therefore would not adequately fill the 2G/3G coverage/capacity gap nor enable 4G services in to the network.

The NPPF strongly supports sustainable development as does the Council's Core Strategy including Policy CS1. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore comply with NPPF and the Core Strategy including Policy CS1 to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

Taking into account the local planning policies which are applicable it has been illustrated that the proposed upgrade fully accords with the Council's Development Plan and national planning policy guidance. In light of the above, the applicant considers that the proposal strikes a good balance between environmental impact and operational considerations.

Health and Safety

The proposed installation conforms to current government planning guidelines regarding potential health effects arising from telecommunications development. The operator has attached a declaration that the site conforms to ICNIRP guidance. This is in full accordance with NPPF.

Recent court cases have confirmed that the *public perception* of health risks can be a material consideration within the land-use planning system. 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.

The publication of the National Planning Policy Framework continues to highlight the Governments view that the planning system is not the appropriate mechanism for determining health safeguards. It sends a clear message to local planning authorities stating that they 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'*. This is reiterated in the Code of Best Practice.

In this instance, Vodafone Limited believes that it is not necessary to consider health effects further, as recommended by NPPF. The operator is committed to ensuring that all new and existing installations are ICNIRP compliant, and consequently it is considered that there is no basis for this application to be refused on health and safety grounds or for reasons relating to public concerns about health and safety. ICNIRP compliance certificates are enclosed for the operator with this application. If required, additional information regarding the operation of mobile telephone base stations and health and safety considerations can be provided.

Summary

To summarise the case in favour of the proposals the following points are of relevance:

- With specific regard to telecommunications development, the proposal accords fully with Policy CS1 and CS14 of the Core Strategy and Policy DM25 , the NPPF and the Code of Best Practice;
- Site selection was progressed in accordance with the applicants licence obligations, advice in NPPF and the Code of Best Practice and represents the least environmentally intrusive, technically suitable, available option;
- The significance of the proposal in the development of two competing companies to operate and manage a single network grid using modern MORAN technologies across the UK is a material consideration. By pooling the operators' basic network infrastructure, this will:
  - Automatically increase each operator's footprint by 40%, adding competition and choice for customers in areas that previously only had one operator's coverage available.
  - Close the digital divide between rural and urban areas targeting 98% indoor population coverage across 2G and 3G by 2015.
  - Lay the foundations for two competing 4G networks to deliver the capability for a nationwide 4G service faster than could be achieved independently.
- With the advent of smartphones and tablet computers the demand for indoor 3G coverage and high speed data capture is increasing rapidly and the operators are obliged to meet this demand and provide a high quality service in line with the NPPF guidance.
- An existing structure is being upgraded by the applicant with minimal alterations in order to allow the operators to manage a single network grid and which fully accords with NPPF guidelines;

- The operators site selection strategy is to keep the overall environmental impact to a minimum through utilising the same sites wherever possible. The operators are utilising the same site where it is technically and legally possible and is the sequentially preferable environmental solution;
- The proposals would not constitute a proliferation of telecommunications installations as advocated by NPPF;
- The height of the proposed replacement antenna will not increase, however the underside would be marginally lower than the existing resulting in the antennas being slightly longer but no higher. The replacement is required because the existing infrastructure cannot support multiple MORAN technologies for both operators on a single site. The proposed alterations have been kept to the absolute operational minimum to clear the immediate buildings/clutter/trees and provide adequate service coverage and capacity for the operators to the immediate area.

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