



Our ref. CMN064

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Submitted via the Planning Portal

Dear Sir,

GPDO APPLICATION FOR THE UPGRADE OF AN EXISTING SITE COMPRISING OF THE REMOVAL OF THE EXISTING FLAGPOLE ANTENNA, THE INSTALLATION OF 3NO. ANTENNAS AND 3NO. ADDITIONAL MAST HEAD AMPLIFIERS (MHAS) TO BE LOCATED ON THE EXISTING STRUCTURE ON THE ROOFTOP, THE REMOVAL OF THE EXISTING NODE B CABINET AND THE INSTALLATION OF A 42U DUO CABINET ON THE EXISTING GRILLAGE, AND ASSOCIATED DEVELOPMENT, AT CENTENARY HOUSE, 98 CAMDEN HIGH STREET, LONDON, NW1 7JY

We are planning consultants retained by MBNL to submit planning applications on their behalf. This proposal is for the upgrade of the existing Hutchison 3G UK Limited (H3G) site.

Enclosed you will find a GPDO planning application prepared on behalf of H3G. H3G have been licensed to provide a Cellular Network based upon the Global System for Mobile (GSM) standard and Universal Mobile Telecommunications System (UMTS) within the United Kingdom.

The development consists of:

"The removal of the existing flagpole antenna, the installation of 3no. antennas and 3no. additional mast head amplifiers (MHAs) to be located on the existing structure on the rooftop, the removal of the existing Node B cabinet and the installation of a 42U DUO cabinet measuring 1200 x 750 x 2190mm located on the existing grillage, and associated development."

Enclosed is the following:

- cheque for £385 made payable to London Borough of Camden
- CMN064_Centenary House_NW0074_001,002,003,004,005A
- Application forms
- ICNIRP Certificate
- Supplementary Site Specific Information

- Planning Statement (including design and access statement)

We trust you will find the enclosed information sufficient to register and validate the application. If however you require any further information, please contact Victoria Parsons on 0161 956 4123 or victoria.parsons@gva.co.uk.

Yours sincerely



Victoria Parsons
Trainee Planner
GVA GRIMLEY LTD.
For and on behalf of H3G

1. DESIGN AND ACCESS STATEMENT

In order to comply with the requirements for the submission of planning applications as outlined in Government Circular 01/2006 'Guidance on Changes to the Development Control System', the following design and access statement is enclosed in support of this proposal. The statement links the general development principles to the final detailed design.

1.1. HISTORY & BACKGROUND

In 2000 the Government completed their auction of the third generation (3G) mobile telecommunication licences and Hutchison 3G U.K Limited were successful in bidding for one of the five licences available. The 3G system, also sometimes referred to as Universal Mobile Telecommunications System (UMTS), offers high-resolution video and multimedia services including mobile office services, virtual banking and on-line billing, home shopping, video conferencing and internet access.

This application upgrades the existing equipment.

1.2. DESIGN

1.2.1. The proposal

The proposal is for the upgrade of the existing telecommunications site at Centenary House, 98 Camden High Street, London, NW1 7JY. The proposal comprises the removal of the existing flagpole antenna, the installation of 3no. antennas and 3no. additional mast head amplifiers (MHAs) to be located on the existing structure on the rooftop, the removal of the existing Node B cabinet and the installation of a 42U DUO cabinet measuring 1200 x 750 x 2190mm located on the existing grillage, and associated development.

This site falls within Camden Town Conservation Area. As is it proposed to add 3 antennas and a cabinet measuring less than 2.5 cubic metres, this proposal requires a GPDO application.

1.2.2. Design Considerations

The proposed upgrade utilises an existing site and will provide enhanced coverage in the area. The existing flagpole antenna is not able to provide the coverage required due to the limited directions in which it can transmit, and it is therefore proposed to remove and replace it with 3 antennas and mast head amplifiers, which will be fitted to the existing pole mount. It is also proposed to remove the existing Node B cabinet and install a 42U DUO equipment cabinet, which will be located alongside the existing cabinets on the steel grillage, below the antennas.

Due to the height of the building, the additional equipment will be minimally visible from

ground level. It is not considered that the proposed scheme will have a detrimental impact on the conservation area, and permission should not be withheld.

1.2.3. Planning Policy Considerations

Section 54A of the Town and Country Planning Act 1990 (as amended)(now section 38 (6) of the Planning and Compulsory Purchase Act 2004) states that Local Planning Authorities should determine proposals in accordance with development plan policies, unless material considerations indicate otherwise. Material considerations may include, inter alia, central government guidance, High Court and Inspector's decisions etc.

1.2.4. Local Policy

The core strategy was adopted in 2010 and the following policies are relevant in the determination of this proposal.

Policy CS14 – Promoting high quality places and conserving our heritage

The development policies DPD was adopted in 2010 and the following policies are relevant in the determination of this proposal.

Policy DP25 – Conserving Camden's heritage

In relation to these policies, the proposal is for the upgrade of an existing site. The proposal will not have a detrimental impact on Camden Town Conservation Area, as it will not be visible from ground level due to the height of the building.

1.2.5. National Policy

National Planning Policy Framework

This legislation was introduced on 27th March 2012 and replaces Planning policy Guidance notes and Planning Policy Statements.

The legislation was introduced to help to achieve sustainable development, sustainable means ensuring that that we create better lives for ourselves and not creating worse lives for future generations. Development means growth.

In relation to this policy the following paragraphs are relevant in determining this application:

Section 5 – Supporting high quality communication infrastructure

Section 7 – requiring good design

Section 12 – conserving and enhancing the historic environment

In relation to the above policy, the equipment utilises the existing site where possible. It is

considered that the proposal does not have a detrimental impact on the area.

An ICNIRP certificate has been submitted as part of the application confirming that the proposal complies with guidelines.

Of particular relevance to the determination of this application is Paragraphs 42, 43 and 46.

Paragraph 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.

Paragraph 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.

Paragraph 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 relation to the above paragraphs the proposal upgrades an existing site. An ICNIRP certificate will be submitted as part of this application.

1.2.6 Site Need and Identification

The proposal is to upgrade an existing site therefore no alternative sites were considered as the proposal has very little visual impact on the area or host building.

In addition to the above, the site will form part of an improved upgraded network for Hutchison 3G UK limited which will allow faster downloading and the reduction in call drop outs.

Coverage - The licence granted to H3G demands that strict coverage qualities are met. It is essential that the benefits of mobile telephones are available for all the population. The changing customer use of mobile phones also demands that networks and coverage is available at home, in the workplace, while shopping, enjoying leisure activities or while on the move.

Quality - In order to ensure coverage within buildings such as homes, shops, offices etc. the radio signal has to be of sufficient strength to penetrate walls. In urban and suburban

areas a dense network of base stations is therefore required, some less than 1 km apart.

Capacity - As the use of and demand for mobile phones has increased the number of sites required to provide Network capacity has increased. Each cell or base station can only handle a finite number of calls so in areas of high use additional cells are required to meet demands on the network and thus avoid existing cells going into congestion.

The radio implication of the site: Radio signals are transmitted through the network by using fixed links at such frequencies that necessitate an uninterrupted line of sight. To achieve this, the installation must reach a sufficient height above surrounding buildings and trees. The installation must also be in a position to provide good in building radio coverage to the target area.

The planning tool identifies deficiencies in the network and predicts the location from which the optimum coverage will be provided. This area is referred to as the search area or cell centre.

It is for these reasons that it is important to achieve a service of quality for mobile users. The main complaints received by mobile telephone operators about their service relate to the problems associated with dropped calls and no service. As more and more people are using tablets and smart phones there is a need to ensure that existing sites can meet this demand. This is one such site as due to the location of the site there is a high level of traffic to the site.

1.2.7 Health and Safety

We are aware of media and press articles concerning Health and Safety issues associated with sites such as this site. We remind you that Government Guidance is given in the National Planning Policy Framework.

The proposal for this site has been designed within International Commission on Non-lonising Radiation Protection (ICNIRP) public exposure guidelines and therefore Health and Safety concerns should not be a planning consideration. An ICNIRP certificate is submitted with this application.

In 2000, the Independent Expert Group on Mobile Phones (IEGMP – Stewart Report) recommended a precautionary approach to mobile telephony in general and stressed the need for more research. NRPB endorses this approach and its Advisory Group on Non-lonising Radiation (AGNIR) has just published its findings:

The Operators have studied the science review produced by the Advisory Group on Non-lonising Radiation (AGNIR) and welcomes the overall view that the evidence does not suggest any adverse health effects from radio frequency exposures at levels below guidelines.

In particular, AGNIR has stated that exposure levels in the vicinity of mobile phone base

stations are extremely low and the evidence indicates that they are unlikely to pose a health risk.

AGNIR concludes "In aggregate the research published since the IEGMP (Independent Expert Group on Mobile Phones) report does not give cause for concern." However, it suggests that continued research is needed since mobile phones have been in widespread use for a relatively short time. The operators fully support this view both in principle and contribute to independent, reputable research including the £7.3 million Mobile Telecommunications and Health Research programme. An ICNIRP certificate is submitted with the application.

1.3 ACCESS

Access to the site will remain unchanged, as will the on-going traffic visiting the site. We do not envisage additional maintenance visits incurring, and being new equipment, the likelihood of requiring visits for repair is remote.

2 CONCLUSION

This is an upgrade of an existing site; it is not considered that the proposal will have a noticeable impact on the conservation area.

We hope the above information is sufficient for you to consider this application favourably.