



Our ref. Goodge Street

Date: 23rd March 2016

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Chief Planning Officer
London Borough of Camden
Town Hall
Judd Street
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Submitted via the Planning Portal

Dear Sir,

**FULL PLANNING APPLICATION FOR THE INSTALLATION OF 3NO. FACE MOUNTED ANTENNAS
THE INSTALLTION OF 2NO. CSC CABINETS (800 X 660 X 1710MM) ON THE EXISTING ROOF
TOP AND ANCILLARY DEVELOPMENT THERETO.**

We are planning consultants retained to submit planning applications on behalf of Telefónica O2 UK Limited and Vodafone Limited who recently entered into a network sharing agreement. This arrangement allowed each company to share the other party's installation. In September 2012 approval was received from the Office of Fair Trading for the formation of a new company – Cornerstone Telecommunications Infrastructure Ltd (CTIL).

The development consists of:

"3no. face mounted antennas painted to match the building fascia, the installation of 2no. CSC Cabinets and ancillary development thereto".

Enclosed is the following:

- cheque for £385 made payable to London Borough of Camden.
- Application forms
- ICNIRP Certificate
- Planning Statement (including design and access statement)
- Drawings 208374 – CTIL- 100, 201,301,401,501,502 D.
- Photomontage

We trust you will find the enclosed information sufficient to register and validate the application. If however you require any further information, please contact Rebecca Skerrett on 0161 956 4305 or rebecca.skerrett@gva.co.uk.

Yours sincerely,



GVA Grimley Ltd.
International Property Advisors

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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

There is no previous history of telecommunications on this site.

The building is located within a conservation area but is not listed.

1.2. Background to CTIL

For some years Vodafone and Telefonica (O2) have been operating a network sharing agreement – broadly similar to the Orange/T-Mobile/Three arrangement. This arrangement allowed each company to share the other party's installation.

In September 2012 approval was received from the Office of Fair Trading for the formation of a new company – Cornerstone Telecommunications Infrastructure Ltd (CTIL).

1.3. The proposal

The application property is Goodge Street Tube station which is located on the western side of Goodge Street. The building is approximately 11 metres in height and is located within a conservation area.

Due to the massive demand that is now placed on base stations due to the use of smart phones and tablets there are certain areas that need enhanced capacity, therefore CTIL are looking at deploying a number of small cells to enhance areas of poor coverage.

The equipment is proposed by Vodafone and O2 and comprises of 3 small face mounted antennas. 2No. antennas are located at a height of 10.5 metres and 1 No antenna located at 11 metres AGL. The antennas are small in scale and are face mounted to the building. The antennas will be painted to match the fascia of the building. Two cabinets are proposed on the roof of the building. The cabinets are set back from the front of the building to lessen their visual appearance when viewed from street level and are adjacent to the flank wall of the adjoining building.

1.5 Design Considerations

The antennas are small in scale and will be painted to match the fascia of the building. The cabinets are set back from the building frontage and will not be clearly visible from

public vantage points. It is not considered that the proposal is detrimental to the conservation area.

1.6 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.

1.7. 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 a new telecoms site but it does utilise an existing building. The proposal will not have a detrimental impact on the Conservation Area as these are small antennas which will be painted to match the building.

1.8 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 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:

Paragraph 17, "always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver

sufficient community and cultural facilities and services to meet local needs.

Paragraph 18 "the government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths and to meeting the twin challenges of global competition and of a low carbon future."

Paragraph 20 "To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century".

In relation to the above paragraphs the additional site will enhance the level of coverage in the area. Over recent years the demand on the sites has increased massively as people now want to use phones and tablets where ever they are. The proposal is of a high design quality and does not blight the host building or the surrounding area.

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 number 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."

In terms of the above, the proposal utilises an existing building and the antennas are small and will be painted to match the building.

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

1.9. Site Need and Identification

Due to the massive demand that is now placed on base stations due to the use of smart phones and tablets there are certain areas that need enhanced capacity, therefore O2 are looking at deploying a number of small cells to enhance areas of poor coverage.

These antennas are small in scale and work on a point to point basis. The antennas have been designed to be located on the fascias of buildings.

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

Coverage - The licence granted to CTIL 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.

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 and where they are unable small infill sites are required.

This site will provide much needed capacity in and around this area.

1.10. 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-Ionising 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-Ionising Radiation (AGNIR) has just published its findings:

The Operators have studied the science review produced by the Advisory Group on Non-Ionising 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.

2.0. Consultation

We have undertaken consultation with the LPA Councillors Francis, Harrison and Madlani. To date no responses have been received.

3.0. 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.

4.0 CONCLUSION

The antennas are small in scale and will provide additional capacity in the area. The proposal has been designed to be the least visually intrusive and it is not considered that this will blight the conservation area or the host building and is not considered that permission should be withheld.

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