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| **SUPPLEMENTARY INFORMATION** |

1. Site Details

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| Site Name: | Church Studios | Site Address: | Church Studios, Camden Park Road, Camden, London, NW1 9AY |
| National Grid Reference: | E529816 N184780 |
| Site Ref Number: | 143464\_VF | Site Type:[[1]](#footnote-1) | Macro |

1. Pre Application Check List

**Site Selection (for New Sites only)**

(Would not generally apply to upgrades/alterations to existing sites)

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| Was an LPA mast register used to check for suitable sites by the operator or the LPA? | Yes | **No** |
| If no explain why:  n/a upgrade of existing site | | |
| Was the industry site database checked for suitable sites by the operator: | Yes | **No** |
| If no explain why:  n/a upgrade of existing site | | |

**Annual Area Wide Information to local planning authority**

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| Date of information submission to local planning authority | October 2015 |
| Name of Contact: | Head of Planning |
| Summary of any issues raised: | List of existing sites and general rollout at that time within the authority. |

**Pre-application consultation with local planning authority**

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| Date of written offer of pre-application consultation: | 23.03.2016 | |
| Was there pre-application contact: | Yes | **No** |
| Date of pre-application contact: |  | |
| Name of contact: |  | |
| Summary of outcome/Main issues raised:  It is highlighted at this juncture that an application for :- *The removal and replacement of 3no. existing antennas with 3no. new antennas on existing pole mounts. The installation of 6no. RRUs (Remote Radio Units) on poles, painted to match brickwork. The proposal also involves installing equipment within the existing equipment room and development ancillary thereto*, was submitted to the LPA (LPA ref:- 2015/4040/P). However the application was withdrawn as concerns were raised by the case officer who stated:- *”The cumulative impact of adding more equipment to the roof (the building is a positive contributor to the conservation area and the equipment would be highly visible in the public realm). Furthermore the Camden Square Conservation Area Appraisal and Management Strategy has been revised since the last application at the site in 2010”.*  In light of this the operators have sought to amend the proposed design by removing the 6no. RRU’s that were proposed so that the proposal constitutes a replacement on a like-for-like basis, which is considered to have a neutral impact on the character and appearance of the surrounding area. Amended draft drawings were sent to the case officer on 23.03.2016.  As the proposal relates to the upgrade of an existing base station and the principle of telecommunication development is established on-site, it was considered appropriate to progress this application and seek the LPA’s formal determination. | | |

**Ten Commitments Consultation**

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| Rating of Site under Traffic Light Model: | Red | Amber | **Green** |
| Outline Consultation carried out:  A pre-application consultation email was sent to the ward councillors on the 23.03.16 which included site-specific draft drawings and outlined the need for the telecommunications base station. | | | |
| Summary of outcome/Main issues raised:  To date no formal comments have been received. | | | |

**School/College**

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| Location of site in relation to school/college *(include name of school/college):*  No school or college were considered to have a direct or functional relationship with the site. |
| Outline of consultation carried out with school/college *(include evidence of consultation):*  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? | Yes | No |
| Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified? | Yes | No |
| Details of response: n/a Full Planning application | | |

**Developer’s Notice**

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| Copy of Developer’s Notice enclosed? | **Yes** | No |
| Date served: n/a Full Planning Application | n/a | |

1. Proposed Development

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| The proposed site: |
| This application relates to an existing telecommunications installation, which is found on-site. For reference please see below a photograph of the base station in-situ: -  \\monogla2\Project\8. Project Beacon\E. Sites - Ref_Host_Name\B. CTIL\140001 to 150000\143464_20_VF337_26_Met CHURCH STUDIOS\3. Design\Photographs\IMG_4195.JPG\\monogla2\Project\8. Project Beacon\E. Sites - Ref_Host_Name\B. CTIL\140001 to 150000\143464_20_VF337_26_Met CHURCH STUDIOS\3. Design\Photographs\IMG_4194.JPG  This is the preferred option as there is an existing telecommunications installation at this location that provides coverage to the surrounding area for Vodafone and Telefonica and that can be upgraded to provide improved coverage.  Taking into account the character and appearance of the Conservation Area, the extent of development has been kept to a minimum. Taking into consideration the location of the existing telecommunications installation on the roof, it is considered that the upgrade proposal will have a negligible visual impact on the streetscape and skyline.  The proposal is to replace 3no. existing antennas with 3no. new antennas on existing pole mounts, it is therefore considered that the level of visual impact has been kept within reasonable bounds.  This upgrade proposal also includes new equipment housed internally within the existing equipment room thus avoiding any visual clutter on the roofline and maintaining the appearance of the host building.  Land use in the surrounding area is predominantly residential. |

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

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| Type of Structure | |
| Description:  The removal and replacement of 3no. existing antennas with 3no. new antennas on existing pole mounts. As part of the proposed works the existing cable tray will be replaced in order to accommodate the new feeder cables.  It is also of note that new equipment will be housed internally within the existing equipment room. | |
| Overall Height to top of antenna: 28.2 metres | |
| Tower/mast etc – type of material and external colour: | Antennas untreated – manufactured grey finish. |
| Equipment housing – type of material and external colour: | n/a housed within internally within equipment room |

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| Reasons for choice of design: |
| In this instance, the choice of design tabled in this application has been influenced by the existing base station’s siting and appearance, the technologies it currently supports, most notably the added emphasis to cater for 4G coverage requirements. As part of a sequential approach to site selection, an existing base station development made available as part of the CTIL initiative was identified at this site.  The proposed antennas and their positions on the building offer a technically preferred solution, in which where possible the antennas will be titled and orientated so as to provide cell specific coverage to the demands of the target area. Taking into account the existing arrangement and the character and appearance of the Conservation Area, the extent of development has been kept to a minimum.  The replacement antennas will be fixed to existing support poles. The proposed antennas will be left in their manufactured form and will take a similar appearance to those they replace. In this regard although the proposed antennas will be seen from wider vantage points, it is considered that the level of visual impact has been kept within reasonable bounds when taking into account the extent and visibility of the existing rooftop antennas.  This upgrade proposal also includes new equipment housed internally within the existing equipment room. In this respect it is considered that the siting of the ancillary development makes best use of the existing facilities, thus avoiding any visual clutter on the roofline and maintaining the appearance of the host building.  In light of the above it is considered that every effort has been made to limit the visual impact of the upgrade scheme. It is considered that reasonable steps have been taken to achieve this by limiting the extent of development and grouping antennas together, in which the upgrade scheme will have a neutral impact on the host building. Accordingly, it is considered that the proposal when taking into account the siting and design of the existing rooftop base station would have a negligible visual impact on the Conservation Area, thus preserving its character and appearance. |

Technical Information

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| 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 to the site are taken into account.  In order to minimise interference within its own network and with other radio networks, Vodafone Limited operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of Vodafone Limited’s network, the radio base station that is the subject of this application will be configured to operate in this way.  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. | **Yes** | No |

1. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

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| **Reason(s) why site required e.g. coverage, upgrade, capacity** |
| It was announced in mid-2009 that the Vodafone Group were to form a strategic partnership with the Telefónica Group to share their telecommunication infrastructure assets across Europe. In the UK this project was called ‘Cornerstone’ as saw both Vodafone Ltd and Telefónica UK Ltd, commonly known as O2 working closely together to pool their resources and infrastructure making substantial improvements to their 2G and 3G networks. This initial agreement between the two aforementioned operators broke barriers in addressing the historical limitations encountered in conventional mast share schemes. It allowed both organisations to consolidate a number of base stations through, where appropriate, sharing each other’s sites and in turn significantly reducing the environmental impact of their network deployment. Although infrastructure development formed part of Cornerstone, Vodafone and Telefónica have continued to actively compete in the telecommunications market place to retain and win mobile phone customers and both operators differentiate themselves on the quality of their customer experience. Although Vodafone and Telefónica share their infrastructure, they operate entirely independently as businesses with their own separate strategies and networks. Accordingly the key focus as part of Cornerstone was to build new sites which had the capabilities to provide coverage for both operators.  In February 2013, the Office of Communications, commonly known as Ofcom, who are the independent regulator and competition authority for the UK’s communications industries announced the winners of the 4G mobile spectrum auction. 4G is the fourth generation of mobile phone technology and follows on from 2G and 3G. 2G technologies is predominately used for making calls and sending text messages, whilst 3G enables access to internet services more effectively through a mobile device. 4G services are intended to improve mobile broadband services into the future, enabling greater capacities of data to be shared via mobile technologies with speeds likely to be nearer those currently experienced via home broadband. Both Vodafone and Telefónica were awarded 4G licenses, hence they have entered into a new agreement in which the two companies now plan to jointly operate and manage a single network grid across the UK. This initiative strengthens the network infrastructure partnership between the two companies, previously rolled out as part of Cornerstone. This next phase of consolidation will primarily involve upgrading existing base stations to accommodate 4G technology and will be facilitated by Cornerstone Telecommunications Infrastructure Limited (CTIL), a newly formed joint venture company owned equally by Vodafone and Telefónica. The single grid infrastructure will enable both organisations to pool and consolidate their respective networks yet further while running two, independent, nationwide networks.  The rollout of multiple technology networks to support the growth of mobile devices has had an impact on more conventional ways of communications. Latest figures from the regulator, Ofcom, show that consumers are spending less time using their landlines in the year to June 2014, a reduction of 12.7% in one year alone. In this respect it is thought that fixed line call volumes are declining as people are using mobiles speak to each other. Also the way people communicate on mobile devices is changing as they have instant access to video calls and may choose to utilise the in-built capabilities of various messenger and social media applications.  In December 2014, Ofcom published their finding on the status of electronic communications networks and services in the UK. The Infrastructure Report 2014 acknowledges that robust telecommunication networks present vital enablers towards supporting a vast amount of economic and social activity, by both general consumers and businesses. The report provides an overview of the state of telecommunications infrastructures in the UK in terms of its coverage, capacity and reliability. In Ofcom’s Infrastructure Report 2014 it suggests that fixed broadband connections are now almost universally available throughout the UK, however internet and downloads speeds can be patchy. However it is said that 18% of households do not have any home fixed line internet access at all and with about 16% of households already having no voice landline, it is apparent that mobile connectivity is a society choice that has importance.  According to Ofcom in November 2014, UK 4G speeds were more than twice as fast as 3G. However in a report of the same year compiled by OpenSignal, who studies mobile phone signal strengths, it was suggested that 4G speeds had almost halved in the past year as more people sign up to such services. In this respect, as well as providing coverage representation a base station will also provide much needed capacity to a network. Added capacity will create a reliable customers experience by reducing not-spots, call dropping and provide a more consistent mobile internet connectivity which people expect from their mobile devices whenever and wherever they are using them.  A retained base station site is required in this location in order to maintain existing network coverage and capacity, as well as catering for added multiple technologies, most notably 4G for both Vodafone and Telefónica, commonly known as O2.  Details regarding the general operation of the Vodafone and Telefónica networks can be found in the accompanying document entitled ‘General Background Information for Telecommunications Development’. This information is provided to assist the Local Planning Authority in understanding any technical constraints on the location of the proposed development. Supporting information can also be found in the attached CTIL document called ‘Radio Planning and Propagation’, which discusses how radio networks are planned, the need for height and the limitations associated with the technology.  Furthermore the new Code of Best Practice on Mobile Phone Network Development published by the Mobile Operators Association (MOA) in July 2013 explains the special operational and technical considerations, which the telecommunications industry encounters. It also details the evolution of mobile networks and discusses the implications of mobile connectivity in the 21st Century. The new Code of Best Practice on Mobile Phone Network Development explains how mobile networks function and the challenges faced in providing sufficient signal, coverage and capacity to supporting customer experiences. It is also of note that the MOA has produced a new guidance document to clarify some of the technical aspects of network development entitled ‘Mobile Networks: What They Are and How They Work’, August 2013. |

1. 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)

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| --- | --- | --- | --- |
| Site Type | Site Name & Address | National Grid Reference | Reason for not choosing |
| n/a | n/a | n/a | n/a |

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| If no alternative site options have been investigated, please explain why:  In accordance with the operators licence obligations, NPPF and the Code of Best Practice on Mobile Phone Network Development, CTIL have reviewed existing telecommunications provision operated by Vodafone and Telefónica in the intended target area. An existing base station has been identified in which taking advantage of the CTIL agreement a sequential approach to site selection has been taken in seeking to upgrade this particular installation. Furthermore it should be acknowledged that alternative sites would have been considered by the operator and determining planning body when this now existing base station was first conceived and established on-site. |

Land use planning designations:

The application site is set within an area characterised as predominantly residential.

It is noted that the application site is found with designated Article 2(3) land, notably being set within Camden Square Conservation Area. Camden Square Conservation Area was designated in 1974 and was extended in 1980 and 2002. Camden Square Conservation Area is a nineteenth century inner London suburb designed in a gridded street layout focused around Camden Square.

In this regard the impact of the development, if any, on the site’s land use designation will be considered in more detail in the Planning Assessment section of this Supplementary Information submission.

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| Additional relevant information (planning policy and material considerations):  **Planning Policies**  **Local Planning Policy**  It is acknowledged that the Council’s approach to the plan-led system has evolved. Central Government now seek to streamline the process for the preparation and adoption of Development Plans, in which Local Planning Authorities are now required to adopt a new Development Plan in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework. The documents that provide local planning policies are referred to within the 'Local Plan', in which they describe the spatial strategy for the authority. The Core Strategy is the key document that forms the Local Plan and this is supported by various types of detailed information about the local and sub-regional matters. Once adopted decisions will be made in accordance with the Local Plan unless material considerations indicate otherwise.  In this regard, there is no saved policy specific to telecommunications development. However the following development policy is considered relevant in this instance.  DP25 – Conserving Camden’s heritage  *“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.*  *Listed buildings*  *To preserve or enhance the borough’s listed buildings, the Council will:*  *e) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;*  *f) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and*  *g) not permit development that it considers would cause harm to the setting of a listed building.*  *Archaeology*  *The Council will protect remains of archaeological importance by ensuring acceptable measures are taken to preserve them and their setting, including physical preservation, where appropriate.*  *Other heritage assets*  *The Council will seek to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.”*  **National Planning Policy**  **National Planning Policy Framework (2012)**  It is recognised that in seeking to adopt a new Local Plan and Core Strategy national guidance on the matter suggests that repetition, should be avoided thus the most up-to-date policy stance regarding telecommunication development should be taken from National Planning Policy Framework.  5 - Supporting high quality communications infrastructure  The National Planning Policy Framework (NPPF) set out Central Government’s planning policies for England and how these are expected to be applied. It replaces a number of planning documents including Planning Policy Guidance 8 – Telecommunication. NPPF sets out the Central Government’s requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.  Pertinent to telecommunications development section 5 of NPPF sets out the Governments general overview regarding supporting high quality communications infrastructure and is stated as follows: -  *“42. Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.*  *43. In preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.*  *44. Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. They should ensure that:*   * *they have evidence to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and* * *they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and telecommunications services.*   *45. Applications for telecommunications development (including for prior approval under Part 24 of the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:*   * *the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college or within a statutory safeguarding zone surrounding an aerodrome or technical site; and* * *for an addition to an existing mast or base station, a statement that selfcertifies that the cumulative exposure, when operational, will not exceed International Commission on non-ionising radiation protection guidelines; or* * *for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self certifies that, when operational, International Commission guidelines will be met.*   *46. Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure.”*  **Code of Best Practice on Mobile Phone Network Development (2013)**  A new English Code of Best Practice on Mobile Network Development has replaced the original guidance document that was first published in 2002. Since the previous version, there have been significant changes in planning policy with NPPF replacing PPG8, as well as in technology and infrastructure rollout due to consolidation agreements. The planning process and tools in the new Code of Best Practice remains much the same as previous, in which the following is considered relevant in this particular case: -  The opening paragraphs of the new Code of Best Practice acknowledge the material weight that should be given to NPPF, in particular Section 5 - Supporting high quality communications infrastructure as noted above. It is noted in paragraph 3.2 that special operation and technical considerations should be taken into account in which it is stated that due to increased demands of mobile device users there will be *“the requirement to upgrade and improve networks through changes to existing sites and the development of new sites”*  It is highlighted in paragraph 7.5 and in Appendix A which sets out the operators Ten Commitments that there will always be an emphasis on site sharing. Operators will *“continue to work together to locate base stations on existing structures, and to share sites wherever viable in order to reduce the need to build new masts on which to locate their equipment and to minimise the number of base station sites in the UK.”*  Appendix B discusses the general principles for telecommunications development. It is stated that “*The Government’s general policy on telecommunications development is to facilitate the growth of efficient and effective telecommunication systems whilst keeping the environmental impact of such development to a minimum. The siting and design of telecommunications equipment, if undertaken with care and sensitivity, will be vital in achieving this policy aim. Good siting and design should not only be respected in environmentally sensitive areas but should also be applied to all telecommunications development. In all circumstances, the sensitivity to context of the proposed development should be considered.*  *In particular, the following general design principles should be regarded as important considerations in respect of telecommunications development:*   * *Proper assessment of the character of the area concerned* * *Design should be holistic and three dimensional showing an appreciation of context;* * *Analysis of the near and far views of the proposal and to what extent these will be experienced by the public and any residents;* * *Proposals should respect views in relation to existing landmarks and distant vistas;* * *Proposals should seek to consider the skyline and any roofscapes visible from streets and spaces;* * *Choice of suitable designs, materials, finishes and colours to produce a harmonious development and to minimise contrast between equipment and its surroundings.*   *The options for the design used by an operator will be affected by site conditions, technical constraints, landscape features and coverage and capacity requirements. The main options would include:*   * *Mast and/or site sharing;* * *Installation on existing buildings and structures;* * *Camouflaging or disguising equipment where appropriate;* * *Using small scale equipment;* * *Erecting new ground based masts.”*   Appendix B goes on and recognises that mast and site sharing is a longstanding Government policy objective. In this regard the Government encourages telecommunications operators, wherever viable, to share masts and sites as a means of minimising overall mast numbers. It is stated in Appendix B that *“If operators are able to share sites, and install more equipment on each site, this reduces the overall visual impact of network infrastructure, because even though shared sites will tend to be slightly bigger, it means that fewer sites are needed to improve coverage and capacity, infrastructure becomes more feasible, and is more cost-effective to deploy. In fact, sharing of sites is now the norm, and network operators now share much of their network infrastructure via joint venture commercial arrangements.”*  **Mobile Networks: What They Are And How They Work (2013)**  It is highlighted that the new Code of Best Practice is supplemented by a document titled ‘Mobile Networks: What They Are And How They Work’. It explains the main factors that affect radio signals such as shadowing, attenuation, diffraction and reflection. In this regard it should be appreciated that antennas need to be sited with the clearest possible view of the area for which they are intended to provide coverage. It is stated that *“there are various reasons that can lead to the need for new cell sites. Two main ones are the need for additional coverage and capacity. Other factors that can lead to the need for new sites include the introduction of new technologies and services; new property developments in an area requiring new coverage or additional capacity; or redevelopment of an area requiring existing sites to be replaced.”*  **London Plan (2015)**  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. In Paragraphs 1.38-1.41 *‘Ensuring the infrastructure to support growth’*, the London Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that the city requires to secure its long-term growth. Such matters are further echoed by the Mayor’s Offices long term strategy as documented in the London Infrastructure Plan 2050.  It is considered that the Vodafone and Telefónica networks are an integral element in securing the Mayor’s vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in Policy 4.11 ‘Encouraging a Connected Economy’ of the London Plan. Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform in allowing Vodafone and Telefónica to provide additional 3G and 4G coverage to the surrounding area.  The aim of the Infrastructure Plan is to enable for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 of the Plan indicates how the London Mayor’s Office shall support an economically viable mix of technologies including fibre broadband, mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. This document is supported by the report Raising London’s High Speed Connectivity to World Class Level. As detailed within these Digital Connectivity is now considered the fourth utility. Internet access not only affects the productivity of businesses and proves essential to the future growth of many firms, it is also vital for many residents to take part in modern society as more services move online.  The Mayor’s Office shall work with central government and London’s local authorities to ensure that strategic communication networks are enabled rather than inhibited by the planning and other regulatory systems whilst ensuring the utility works themselves are properly managed.  The Vodafone and Telefónica networks are integral elements in securing the Mayor’s vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.  **Planning Assessment**  From the outset, it should be appreciated that irrespective of the installation’s use as a telecommunications base station, its change in form will always be, to some degree, a noticeable alteration to those residents and regular passers-by found closest. However it should be recognised that visibility or a development’s siting and appearance within the context of a sensitive designation, most notably in this instance the site being found within a Conservation Area does not automatically result in an overwhelming adverse harm. Similarly, it should be acknowledged that the presence of the existing telecommunications installation on-site may result in a number of preconceptions regarding the new proposal now subject to this application. In reflection it should be appreciated that these opinions may actually derive from the previous planning history and or the siting and appearance relating to the now existing mast. Irrespective of these viewpoints and what has gone before, it should be acknowledged that the existing base station is now established on-site, in which this provides a good reference point for the upgrade scheme’s siting and appearance.  In light of the above it is considered that the planning assessment of this case should concentrate on whether the proposed changes in terms of its form when compared to the existing development are significant as to outweigh other material planning matters. Indeed it should also be ascertained as to whether there is still a need for the base station and if there have been any notable changes in terms of the site specific siting and surroundings which should be given material weight. Also the latest proposal subject to this application should be reviewed against the up to date planning policy regarding telecommunications development.  As discussed previously with regards the choice of design when comparing the appearance of the existing installation with the proposed scheme, it is considered that the upgrade development will not undermine the visual amenity of the area. The upgrade proposal has dual user capabilities whereby balanced against the other material planning matters as below, it is considered that the CTIL scheme is acceptable.  **Conservation Area**  To expand upon the siting and appearance of the upgrade scheme within the context of Article 2(3) land, firstly it should be acknowledged that the principle of telecommunications is established on-site as this has been accepted by the determining planning body when they approved the original scheme in the first instance. Nonetheless the application site is found within Camden Square Conservation Area, therefore in this respect the proposal has been designed sensitively to respect the historic environment. Furthermore the extent of telecommunication development in this case has been kept to a minimum and has been progressed proportionate to the asset’s importance. In this regards it should be appreciated that the proposal seeks to re-use where best possible existing apparatus and is designed with no more development than is sufficiently needed to fulfil the technical requirements of this site.  Comparing the existing and proposed antennas in terms of their siting and appearance, it is considered that parallel assertions should be taken. When taking into account the existing antennas which are in-situ on the roof of the building, it is considered that the position of the new antennas would not form incongruous features within the context of the host property. It is the applicant’s opinion that the telecommunication development would not appear untoward within the context of the Conservation Area. It is considered that as the proposed antennas are to directly replace existing antennas, the upgrade works would be barely noticeable to the casual glance. Therefore the applicant deems that the siting and appearance of the proposed new additions would preserve the character and appearance of the Conservation nor would it undermine the architectural qualities of the building.  In conclusion it is considered that when balanced against all material factors of this case, the proposal’s siting and appearance will not have a significance impact on the surrounding Conservation Area.  With regards the need for the development it has been highlighted previously that the existing base station requires upgrading to meet the existing and future demands of mobile users. Irrespective of a site designation, the public benefits of the telecommunication development in providing coverage and capacity should be seen as a material planning consideration. The use of mobile devices has become an essential part of everyday life for the vast majority of people in the UK.  Indeed mobile technology is important for personal communications, but it is becoming more and more important for businesses, making a vital contribution to overall economic prosperity. In this respect the network infrastructure development progressed by the operators is largely determined by consumer demand. These customers wish to be able to use their devices wherever they are, in which in designated areas this coverage requirement is no different. Albeit Conservation Areas can present difficulties in terms of their built and natural character, it is considered that the technical needs have been addressed by taking a responsible and sensitive approach to the siting and appearance of this base station development. In this regard it is considered that the wider public benefit of providing multiple technologies for two operators is sufficient to outweigh any undue harm to the designated asset.  It should be acknowledged that a sequential approach to site selection has been taken. The upgrade proposal will facilitate mast sharing and provide multiple technologies whereby it should be noted that it seeks to replace an existing installation found at the application site. It should therefore be acknowledged that the upgrade proposal would not increase the proliferation of telecommunications apparatus within the area. Taking into account the context in which the upgrade proposal would be read, it is considered that this site remains an appropriate location to site a telecommunication base station. The scheme would be set on private land, in which its siting would not impact upon recognised pedestrian and vehicular movements. These are all considered features and a context that would help assimilate the base station’s change in form into this particular environment. In light of the above, it is considered that the upgrade proposal would not be overly intrusive in this particular environment. Taking all matters into account, it is the applicant’s opinion that the visual impact as a result of the proposed changes would not outweigh the other material merits of this case.  It is recognised that the existing base station was determined prior to the adoption of the aforementioned National Planning Policy Framework. NPPF, in particular Section 5, should now be given significant weight especially as there are general moves away from locally based telecommunications policy. Nevertheless it is evident that the guiding factors of telecommunications policy have not altered significantly since the existing mast was established on-site and the key material considerations are deep rooted in planning policy. In this regard it is reasonable to presume that NPPF has derived from PPG8 which was applied in the first instance. As previously highlighted the Code of Best Practice on Mobile Network Development has updated and is more reflective of today’s current practices. Therefore it is considered that there is limited material conflict between the latest adopted national planning policies used today when compared to the policy context that has gone before. Similarly taking into account the local planning policies which are now applicable, it is considered that the upgrade proposal accords with the Council’s Development Plan.  In light of the case presented above, the applicant considers that the upgrade proposal strikes a good balance between environmental impact and operational considerations.  **Health & Safety**  Court cases have confirmed that the public perception of health risks can be a material consideration within the planning system. That said the weight to be attached to this issue has to be determined accordingly in each case by the decision maker. However it has been generally upheld 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 base station will comply with the International Commission on Non-Ionizing Radiation Protection guidelines.  It should be recognised that it has been long since established that it is Central Government's stance that the planning system is not the appropriate mechanism for determining health safeguards. It remains Central Government’s responsibility to decide what measures are necessary to protect public health. Most notably it is Central Government's view that if a proposed development meets the ICNIRP guidelines for public exposure it should not be necessary for a Local Planning Authority, in processing and determining an application for planning permission or prior approval, to consider further the health aspects and concerns about them.  In this respect the operators believe that it is not necessary to consider health effects further. Vodafone and Telefónica as well established operators are committed to ensuring that all new and upgraded installations are ICNIRP compliant. In this regards there should be no basis for this case to be refused on health and safety grounds or for reasons relating to public concerns about health and safety. An ICNIRP compliance certificate is attached as part of this submission, as required by NPPF paragraph 45. As previously noted in this submission statement the ICNIRPdeclaration takes into account the cumulative effect of the emissions from the proposed upgrade installation and all radio base stations present, at or co-located near to the proposed installation. Albeit the upgrade proposal has dual user capabilities and seeks to provide multiple technologies the radio frequency emissions from the proposed development will be may times lower than the ICNIRP reference standard in all publicly accessible areas around the installation. In the light of the above information, it is clear that the weight to be given to such health and safety concerns should not be so great as to warrant a refusal of the case on these grounds. |

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1. Macro or Micro [↑](#footnote-ref-1)