SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Troyes House	Site Address:	Troyes House, Lawn Road, London, NW3 2XT
National Grid Reference:	527575, 185042		
Site Ref Number:	148391	Site Type:[1]	Macro

1.1 Background

This application proposes to install a base station on the roof of the Troyes House residential block. The building is located off Lawn Road, adjacent the junction of Lawn Road with Upper Park Road.

The application seeks consent to install a Glass Reinforced Plastic ("GRP") screen on the upper roof level of the plantroom on the building. This would screen 6 no. antennas with ancillary works. Radio equipment cabinets are proposed internally within the existing room below the proposed antennas at roof level. The development would allow Telefónica UK Ltd (trading in the UK as O2) and Vodafone Ltd to provide enhanced coverage to the surrounding area. 2G, 3G and 4G coverage would be provided for both operators.

2. Pre Application Check List

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

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	**Yes**	No
If no explain why:		
Were industry site databases checked for suitable sites by the operator:	**Yes**	No
If no explain why:		

Annual Area Wide Information to local planning authority

Date of information submission to local planning authority:	13th October 2015
Name of Contact:	Neil Storer & Gavin Polkinghorn
Summary of any issues raised:	No comments are noted as having been raised.

[1] Macro or Micro

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	10/03/2016	
Was there pre-application contact:	Yes	**No**
Date of pre-application contact:	N/A	
Name of contact:	N/A	
Summary of outcome/Main issues raised: No formal response has been received.		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	**Red**	Amber	Green
Outline of consultation carried out: Consultation was undertaken on 10 March 2016 with the Gospel Oak Ward Councillors, Councillors Blackwell, McCormack, Revah, and with the Member of Parliament for the area, Keir Starmer. A voluntary site notice was displayed outside Troyes House on 8 August 2016.			
Summary of outcome/main issues raised: 10/03/16 - Email received from Councillor Blackwell advising the proposal is fine with him 15/03/16 - Email received from Councillor McCormack advising she is interested to see the results of the consultation with residents A number of objections and requests for further information were received from residents of the surrounding area in response to the voluntary site notice. Reasons noted for objection relate to perceived health risks, visual impact and perceived potential to negatively impact property prices. Regarding the potential for negative visual impact, this is addressed in detail within a subsequent section of this document titled “Visual Impact and Appearance”. A An ICNIRP certificate accompanies this application and as such, the matter of Health and Safety needs no further consideration within the planning system. In relation to the objection that the installation will negatively impact property prices, it is noted that whilst the planning system is not set up to protect one individual’s interests above the rights and interests of another, and so this should not be a consideration, there is no hard evidence to substantiate claims that telecommunications development negatively impacts on property values, although there is anecdotal evidence to the contrary. Many consider the provision of high quality network connectivity to be of paramount importance when considering suitable properties to purchase.			

School/College

Location of site in relation to school/college*:* The following educational establishments were identified for consultation in relation to this proposal:- - St Dominic Primary School, Southampton Road, London, NW5 4JS is located approximately 285m away from the application site. - Abacus Belsize Primary School, Hampstead Town Hall, London, NW3 4QP is located approximately 260m away from the application site. - Three Acres Pre-School, 29-31 Parkhill Road, London, NW3 2YH is located approximately 200m away from the application site. - Polkadots Nursery, Blackfriars Parish Hall, Southampton Road, London, NW5 4JS is located approximately 290m away from the application site.
Outline of consultation carried out with school/college*:* Consultation letters were issued to the Head Teacher and Chair of the Governing Body for all schools listed above and to the Managing Director for the Pre-school. Consultation was issued on 10 March 2016.
Summary of outcome/main issues raised: No responses have been received.

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?	~~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

Copy of Developer's Notice enclosed?		Yes	**No**
Date served:	N/A – Full planning application.		

3. Proposed Development

The proposed site:
Troyes House is a four-storey brick building located at the junction of Lawn Road and Upper Park Road. There is an existing plantroom on the rear of the building roof which rises 1 storey above the main roof level. The area around the site is residential in character with properties or residential roads on all sides. The building is located within the Parkhill Conservation Area. The installation is proposed on the upper roof level of the plantroom, where a GRP enclosure is proposed. Equipment cabinets are proposed internally within the existing plant room.

Type of Structure *(e.g. tower, mast, etc):*	Proposed GRP enclosure
Description: The construction of a GRP enclosure atop the existing plant room at roof level. The GRP will enclose a total of 6 no. antennas with ancillary equipment, the installation of 5 no. radio equipment cabinets internally and development works ancillary thereto.	
Overall Height:	16.6m to top of GRP enclosure
Height of existing building *(where applicable):*	14.8m (roof level of plant room)
Equipment Housings:	Please see drawings for details
Length:	
Width:	
Height:	
Materials*:*	
Tower/mast etc – type of material and external colour:	GRP enclosure with a brickwork finish to match the existing brickwork façade of the building. Colour of the GRP can be any colour as agreed with the Council as part of the planning consent.
Equipment housing – type of material and external colour:	Steel coloured light grey.

Reasons for choice of design:
Every effort has been made to minimise the visual impact of the proposed development. The equipment has been designed specifically for this location and incorporates a number of elements to minimise impact, including: 1) Utilising a single site to provide significantly enhanced coverage to the area for both Telefónica and Vodafone. The alternative would be to propose separate installations which would have a greater impact. 2) Proposing a bespoke GRP enclosure to conceal the antennas and supports. This has been proposed, in this instance, due to the location of the site within a Conservation Area and the specific ability of Troyes House to successfully accommodate such a design;

3) Locating equipment cabinets within the existing plant room of the building.

It is considered the proposed equipment is appropriately located. It has been possible to devise a scheme which has a minimal visual impact on the host building and surrounding Conservation Area. By utilising a single site to provide significantly enhanced coverage for multiple operators to the surrounding area, the potential for negative visual impact is further reduced.

The design would result in a less intrusive facility than any other possible design on this building, therefore preserving the character and appearance of the area. It is further considered the proposal strikes an appropriate balance between operational and environmental considerations.

4. Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)* 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, Telefónica UK Ltd and Vodafone Ltd operates its networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of Telefónica UK Ltd and Vodafone Ltd's networks, 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.	**Yes**	No

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

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

Reason(s) why site required e.g. coverage, upgrade, capacity

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, web, TV and downloads. Without base stations, mobiles will not work. They are made up of three main elements. The cabinets which contain the equipment used to generate the radio signal. The supporting structure such as a mast, which holds the antennas in the air and the antennas themselves. Only the antennas emit radio signals.

Many other everyday items also use radio signals to send and receive information, such as television and radio broadcasting equipment and two-way radio communications. Base stations are connected to each other and telephone exchanges by cables or wireless technology such as microwave dishes, to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. The size and shape of each cell is determined by the features of the surrounding area, such as buildings, trees and hills, which can block signals. When people travel between cells, the signal is transferred between base stations without a break in service. Each base station covers a certain area only and can only handle a limited number of calls at once. As mobile phones and devices become more popular more base stations are needed to ensure continuous coverage.

The proposed site would provide 2G, 3G and 4G coverage for Telefónica and Vodafone. 4G (sometimes called LTE (Long Term Evolution)) is the next major enhancement to mobile radio communications networks. 4G technology will allow customers to use ultra-fast speeds when browsing the internet, streaming videos, or sending emails wherever they are. It also means faster downloads on the go.

To meet this demand and improve the quality of service, additional base stations or upgrades to the equipment at an existing base station may be needed. As there are no existing sites in the area which can be upgraded, a new installation is proposed in this instance.

The accompanying coverage plots clearly demonstrate the existing coverage deficiency in the Belsize and Maitland Park area. The cellular region subject to the application is positioned directly between existing sites to the northeast, northwest and to the south.

Throughout the cell there are large areas of ‘indoor suburban’ and ‘indoor urban’ coverage, these areas are not the highest grade of coverage available for 3G and subject to fluctuation

during busy periods as the coverage is provided at the periphery of neighbouring cells, which shrink in size as more users utilise the network via that base station.

High quality 3G coverage can be seen to be provided to Downside Crescent, Lawn Road, Upper Park Road, Antrim Road, Tasker Road, Haverstock Hill and the surrounding area. The areas benefitting from the significantly enhanced coverage include numerous residential properties, recreational spaces, residential roads and distributor roads.

Due to the relative infancy of the 4G network, existing coverage is of even less quality than the established 3G network and as such the service improvement by the proposed installation even more pronounced.

Further detail regarding the general operation of the network can be found in the accompanying document entitled ‘General Background Information for Telecommunications Development’. This information is provided to assist the local planning authority in understanding any technical constraints on the location of the proposed development.

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

Site	Site Name and address	National Grid Reference	Reason for not choosing
RT	Downside Lodge, 29 Upper Park Road, NW3 2UY	527629, 185147	The landlord has confirmed this building is not available for use.
RT	Allingham Court, Haverstock Hill, NW3 2AH	527333, 185143	The owner of this building is progressing a telecoms proposal with another operator and will not consider hosting CTIL equipment.
RT	Holmefield Court, Belsize Grove, NW3 4RU.	527373, 184973	The landlord has confirmed this building is not available for use.
RT	135 Haverstock Hill, NW3 4RU	527492, 184925	The landlord has confirmed this building is not available for use.
RT	Belsize Park Tube Station, 190 Haverstock Hill, NW3 2AJ	527371, 185102	After initially considering hosting a telecoms installation (a planning application was submitted and subsequently withdrawn), the landlord has confirmed the building is not available for use.

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

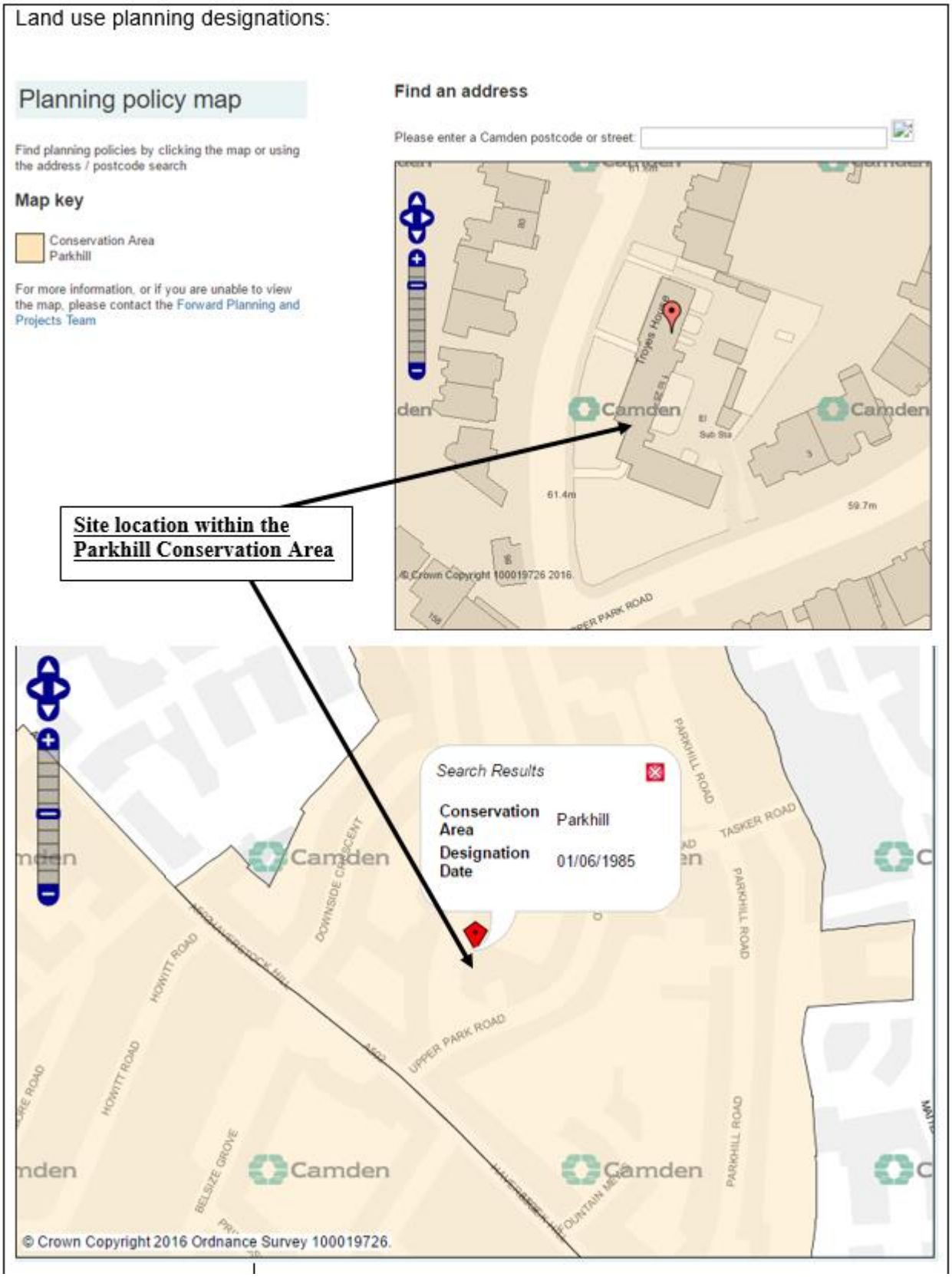
The cellular region is relatively small in size and wholly encompasses residential areas forming part of Belsize Park and the Parkhill Conservation Area.

Due to the nature of the cell and its conservation area character, there are limited potential options which could overcome the surrounding topography, clutter (buildings, trees and other structures), whilst causing minimal visual impact to be considered acceptable development within the conservation area setting.

There are no available options outside of the conservation area which could provide the required coverage to the application cell. The only way to meet the established coverage requirement for both operators was to locate a new installation within the conservation area.

The application site is the best possible solution from a visual impact, radio and design perspective.

Land use planning designations:



The site is located within the Parkhill Conservation Area (see plan above taken from Camden Local Plan maps (top) and Conservation Area Map search (bottom)).

Additional relevant information (planning policy and material considerations):

VISUAL IMPACT AND APPEARANCE

In line with national planning policy guidance and the relevant policies of the Development Plan, the impact of the development is minimised through siting and design initiatives.

The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for Telefónica and Vodafone. It is considered that the proposal is the least visually intrusive site and design available.

It is considered that the proposal utilises the most suitable design available to meet coverage demands. It is considered any other solution to providing the required coverage would have a greater visual impact.

The benefits of the proposal also have to be considered. 2G, 3G and 4G coverage would be provided for Telefónica and Vodafone from the site. It is considered the benefits of the proposal outweigh the minimal additional impact on the surrounding area.

Troyes House is a robust brick clad residential block, located within the Park Hill Conservation Area and predominantly surrounded by semi-detached houses, town houses or other residential blocks.

To the front/north of Troyes House is Lawn Road with residential houses on the opposite side. The view from this location is dominated by the façade of the block, characterised by the brickwork, large and evenly spaced windows as well as the distinct iron railed balconies. The existing plant room is not visible from street level as it is located to the rear of the property and would only be partially visible from the upper levels of the houses opposite. The proposed relative increase in height of the plant room of 1.8m will have a negligible impact and even where visible, will not detrimentally affect the view which is dominated by the existing façade of this building.

When looking from the west, Troyes House is seen from the junction of Lawn Road with Upper Park Road. From this vantage point, the building is set back from the road behind a low brick boundary wall, lined by some maturing trees with a wide grassed area behind this. Views to the building from this aspect are significantly broken up by the large trees surrounding the junction boundary. The proposed relative 1.8m height increase to the plant room will have no significant impact when looking from the west, if it is at all visible.

Views from the south will be from the residential properties lining Upper Park Road. Due to the size and nature of the buildings, only those properties to the north of Upper Park Road will have any open view to the site. However, the nearest properties are angled along the curve of the road so as to avoid directly facing the site location. Those properties further along the curve which would face the site, are further distanced from the building and have intervening mature trees blocking or breaking up the view. Where visible, the accepted panorama will not be unduly affected as the specific design selected, respects the simple and plain symmetry of the building.

From the east the views are limited due to the linear nature of housing in relation to the road. Those properties adjacent Troyes House to the east have limited side windows facing the

building and those directly face the end wall of the building. The existing views will not be adversely affected.

Views from the road, wider surrounding area and residential properties further afield, will be not be materially affected if any difference is even discernible.

The character of Troyes House will not be adversely affected as the GRP shroud will appear as a continuation of the plant room and as such, will blend seamlessly into the buildings aspect and therefore have a negligible impact on the visual appearance to neighbouring properties and surrounding Conservation Area.

On balance this proposed location is considered to be the optimum location for providing coverage in terms of siting and design. As such, equilibrium will be achieved between technical requirements and environmental impact.

PLANNING POLICY

National Planning Policy Guidance

The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. The main thrust of the guidance is a presumption in favour of sustainable development. In general terms in respect of telecommunications the guidance aims to promote sustainable transport (including the need to travel), build a strong and competitive economy, and seeks to secure high quality design.

Specifically, the National Planning Policy Framework (NAPPY) advises that advanced, high quality communications infrastructure is essential for 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. The numbers of radio and telecommunications masts should be kept to a minimum and, where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate (paragraph 43).

The Framework also advises on conserving the historic environment. It sets out how local planning authorities should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. At paragraph 132 it goes on to state that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be'. Paragraph 135 goes on to state that 'in weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.

In more general terms the NPPF confirms that proposals that accord with the provisions of the development plan should be approved without delay (paragraph 14). In addition a set of core planning principles are set out at paragraph 17. These principles set out (in part where relevant to this proposal) that the planning system should:

- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;
- seek to secure high quality design and a good standard of amenity;

- support the transition to a low carbon future in a changing climate.

Significant weight is given to the need to support economic growth through the planning system (paragraph 19). The reduction in the need to travel is set out in section 4.

The National Planning Policy Framework advises specifically that local planning authorities should not seek to prevent competition between operators, and must determine applications on planning grounds (paragraph 46).

It is considered the proposed development complies with the broad aims of the NPPF. It assists in the aim to keep the number of installations to a minimum. The equipment has been sympathetically designed and it would enhance the provision of local community facilities and services. The heritage assets of the area would not be harmed.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted development plan, relevant to the proposed development, comprises the London Plan 2011, the Council's Core Strategy, Development Policies document and Site Allocations document. These are discussed below:

<u>The London Plan (July 2011)</u>

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 Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to secure its long-term growth.

It is considered that the applicants' 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 Plan, which states that:

A. The Mayor and the GLA Group will, and all other strategic agencies should:

a. facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive broadband access meeting the needs of enterprises and individuals.

b. support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits."

At paragraph 4.55 of the supporting written justification to policy 4.11, the Mayor "*wishes to ensure sufficient ICT connectivity to enable communication and data transfer within London, and between London, the rest of the UK and globally*" and *"…support ubiquitous networks – those supporting use of a range of devices to access ICT services beyond desk-based personal computers.."* Furthermore, at paragraph 4.57, the Mayor states the intention to "*…support competitive choice and access to communications technology, not just in strategic business locations but more broadly for firms and residents elsewhere in inner and outer London, and to address e-exclusion amongst disadvantaged groups."*

Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing Telefonica and Vodafone to provide a continued and improved range of coverage to the surrounding area.

Local Plan

There are no policies relating directly to telecommunications development within the Council's policy documents. General polies of relevance include DP 24 of the Development Policies document (Securing High Quality Design) which requires a high standard of development, and policy DP 25 (Conserving Camden's Heritage) which requires development to preserve or enhance Conservation Areas and listed buildings.

It is considered the proposal complies with both policies. The scheme has been specifically designed for this location, with GRP enclosure proposed to fully conceal the required antennas and supports from view. The GRP is designed to match the existing building. Whilst there would be an impact, this is considered to be minimal and not sufficient to cause harm to the area.

The aesthetic qualities of the design proposed, ensure that the minor change to the appearance of the building has a negligible visual impact due to the dissociation from telecoms equipment. The development will be seen as a 1.8m extension to the existing plant room, so as to be absorbed into the form of the building.

Therefore, the development would preserve the character and appearance of the conservation area and listed buildings in the area.

Due consideration has been given to the Parkhill and Upper Park Conservation Area Appraisal and Management Strategy. The specific site identified and design proposal created, has been selected in order to maintain and preserve the special character identified in section 2 of the management plan.

The 19th Century suburb of Belsize is "defined by the busy, urban nature of Haverstock Hill and quiet residential streets that branch from it" and the appraisal further highlights "the quality of the landscape is defined by the hilly topography, the mature trees and the tranche of back gardens behind the houses lining the streets"

The special character of this area will be totally preserved as rather than introduce a totally alien element within the Belsize setting, the proposal merely adds a continuation of the existing

contours and appearance of Troyes House, which is itself an accepted and integral part of the conservation area.

The innovative solution proposed is at the forefront of telecommunications design and the minimal impact caused, cannot be achieved with any other design, or on any alternative location, whilst providing such high quality of network coverage improvement.

Ultimately this application, whilst including an essential telecommunications installation to service the surrounding area, is principally for the consideration of a GRP enclosure. The relative impact to be considered, is therefore the 1.8m height increase to the existing plant room. The associated impact on the character of the conservation area will be minimal.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy the proposal is sympathetically designed, it minimises the number of installations and has a high quality of design. It would enhance the provision of local community facilities and services and would preserve heritage assets.

HEALTH & SAFETY

We would remind the Council that the Government has set out its clear view on the issue of health and perceived view of health risks in paragraph 46 of the NPPF:

“Local planning authorities must determine applications on planning grounds. They should not…determine health safeguards if the proposal meets International Commission guidelines for public exposure.”

As above, and included within this application, Telefónica UK Ltd have confirmed this installation will be fully ICNIRP compliant.

CONCLUSION

There is a requirement for Telefónica and Vodafone to provide enhanced coverage and capacity to the surrounding area. Network planners have identified a need for an installation and the proposed development will address this identified need and continued requirement in line with their licence requirement and customer demands.

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This application demonstrates the technical need for the installation to provide improved customer service.

In terms of design, scale and layout, it is considered that the proposal responds positively to the character, appearance and variety of the local environment and will not have an adverse impact on the application site or the surrounding area. The design is of a high standard, maintaining the specific visual and environmental character of the Parkhill Conservation area. The heritage assets of the area would be preserved.

The telecommunications infrastructure proposed in this application has been designed using appropriate camouflage techniques and sited, having regard to technical, engineering and land use planning considerations, in order to minimise its impact on the character and appearance of the surrounding area. The proposal represents an appropriate siting and design solution for this locality, balancing environmental and planning considerations.

Contact Details

Name: (Agent)	James Lawson	Telephone:	01932 411011
Operator:	Telefónica UK Ltd	Fax no:	01932 411012
Address:	c/o Agent	Email Address:	James.lawson@waldontelecom.com
Signed:	*James Lawson*	Date:	6 October 2016
Position:	Senior Acquisition Surveyor	Company: (on behalf of CTIL and above operator)	Waldon Telecom Ltd